

## RBK&C LDF: CORE STRATEGY EXAMINATION IN PUBLIC

### RESPONSE BY KENSINGTON SOCIETY TO DOCUMENT RBKC/37

Below is the Kensington Society's response to Document RBKC/37 – the comments are all agreed except those where we have commented.

- Page 1: Key Diagram: Wood Lane station  
1.2.8: Line 10: change “and” to “an”
- Page 6: Para 4.3.5: change 70,000sqm to 60,000sqm for plan period – 2008-2028 [cf page 8: CP1 and para 31.3.31]
- Page 7: Para 4.3.7: Counters Creek: clarify start date and uncertainty. It “cannot start before 2015, and, possibly, will not start until later or at all if Ofwat does not approve funding, and is likely to be a 3-year programme. This means that it is unlikely to be completed before 2020, dependent on Ofwat approving the funding. The Council will support Thames Water ‘s bid for funding.”
- Page 16: Para 9.4.6: New neighbourhood centre in Latimer:  
Para 10.3.5: Line 2: change “form” to “from”
- Page 19: Para 12.3.12: Change the start of the new text to read:  
“ There is also a large residential community in the area around South Kensington station. Balancing the needs of residents and the needs of the large volume of visitors ....”
- Page 20: Para 16.3.3: Change to “bureaux de change”
- Page 21: Para 18.1.4: Add:  
“bridges over Chelsea Creek as part of the Thames Path.”
- Page 25: add reference to public consultation – the community should be a partner in this process.
- Page 29: **Post Offices:**  
Para 30.3.4: see Society's comments on RBKC/18F  
Para 30.3.6: see Society's comments on RBKC/18F
- Page 31: add reference to community consultation – the community should be a partner in this process. (also on page 32)

- Page 35: Para 31.3.33: Line 5: Add “highly-“ before “accessible” reflecting the need to be within PTAL 5-6 [See London Plan (2008) Performance Measure 17 (page 395)]
- Page 35 Last line of page 35: Add “highly-“ before “accessible”
- Page 36: Line 2: Delete “predominantly commercial mews” if retained it needs to be clear that this is about retention rather than location of new offices.
- Page 36: Proposed new paragraph after 31.3.33:
- Line 9: change the distance to three minutes/250m walk
- Para 31.3.4: New office development, especially medium-sized and large-scale office developments should be in **highly**-accessible locations – see London Plan (2008) Monitoring Performance Measure which specifies PTALs 5-6.
- Proposal:** Change lines 7-11 to read:
- “New offices may, however, be appropriate in any ‘**highly**-accessible location’, with the Council considering an area which has a Public Transport Accessibility Level (PTAL) score of **5** or greater to be ‘**highly** accessible’
- [see London Plan (2008) Monitoring Performance Measure which specifies PTALs 5-6 as highly-accessible locations for B1 developments.]
- Location of Medium-sized Office units in Employment Zones**
- The purpose of Employment Zones has been and remains to encourage the provision of and retain existing small, flexible premises for small businesses. The size range – depending on whether it was offices or light industry – was up to 150sqm
- Medium-sized business units – 300-1,000sqm – are much larger than needed by small businesses unless they are sub-divided.
- Page 38 Policy CF5(a): Large offices: **Proposal:**

**Change:** “large offices in **Higher Order Town Centres and other within** accessible areas, **that lie within, or close to, Town Centres** except where:” **to:**

“within, or close to, Higher-Order Town Centres and other highly-accessible areas, except where:”

NB: The location for large-scale office developments should relate only to Higher-Order Town Centres **not** all “town centres”

#### **CF5 (c): Medium-sized offices:**

Line 3: insert “highly-“ before “accessible” and delete reference to “predominantly commercial mews” - this is a location for retention **not** for the location of new development. **There are no commercial mews that could accommodate a new medium-sized office – 300-1,000sqm!**

#### **CF5 (k) Employment Zones**

The Society **objects** to the inclusion of medium-sized units (300-1,000sqm), which cumulatively could result in very large office developments in low PTAL locations. Such a policy would be unsound, as Employment Zones were specifically designated because, as low-accessibility, low-rent areas they could support small-scale businesses, not to accommodate large-scale office development. The Council deleted the SPG on Employment Zones with the express intention of making explicit that “it does not support the introduction of new large-scale offices (with a floor area of greater than 1,000sqm) within the Employment Zones” (Key Decision March 2010)

<http://www.rbkc.gov.uk/howwegovern/keydecisions/Reports/Cabinet%20Member%20Planning%20Policy%20and%20Housing%20Policy/KD03287R.pdf>

The Council’s latest proposal to resist large-scale office units and limit the proportion of “medium-sized units” to no more than 25% of the total floorspace of the development recognises the problem of the resulting development being a high trip-generating use because of its overall size and trip-generation potential, but, through including medium-sized units (300-1,000sqm) still effectively encourages large-scale office developments.

**The Society’s strong preference is to retain the original policy, as it would in accord with PPG13 and PPS4 and in general conformity with the London Plan (2008) Policy 3C1 (3<sup>rd</sup> bullet).**

**We are, however, concerned that the revised proposal from the Council was not made as a result of any objection nor has it been subject to consultation, and is in effect a reversal of the original policy CF5 (k) which went to consultation. The Society considers that the Council’s proposal should not even be considered.**

**If you do consider it, our fallback would be to restrict such “large-scale office developments” exclusively to very small and small units only – ie medium-sized units would not be included, because:**

- it would be contrary to the location policy for medium-sized units;
- it would not be in accord with the purpose of Employment Zones – to encourage small business units; and
- a range up to 300sqm would be sufficient to meet the needs of business centres.

The policy CF5 (k) would then read:

“Resist large-scale office developments, except when consisting entirely of very small or small units.”

## **Chapter 34: Renewing the Legacy**

### **Page 44/45: Policy CL1 (c): Density: appropriate density range**

The phrase “require the density of development to be optimised relative to context” is cryptic or even meaningless without reference to the London Plan policy and the Density Matrix, especially as there is little of no indication what this means.

#### **Proposal: Retain and expand existing policy:**

c) require the density of development to be optimized relative to context, whilst taking into account the appropriate density range in the London Plan Density Matrix

Page 45: 34.3.17: Delete “Gloucester Road” and insert “Cromwell Road”.

34.3.20: Change “chartered” to “chartered” x2 and change “Structure” to “Structural”

34.3.20: **retain** “to absorb water and prevent surface water runoff.”

Page 46/47: **Para 34.3.24: Impact of Tall Buildings**

Line 5: After “open space” add “, such as the Kensington Gardens, Holland Park, Brompton and Kensal Cemeteries”

Line 7: After “or those” add “identified in the UDP, including those along and across the Thames, around the Royal Hospital, in and around the South Kensington Museums Area, around the `Royal Parks and Holland Park, and from the Round Pond in Kensington Gardens.”

If the views identified in Conservation Area Proposals Statements are worth mentioning then so must those that were worth having a specific UDP policy.

Page 55 **Policy CL5 (a): Sunlight and Daylight**

The Society **objects** to the use of “material” to qualify any worsening of conditions where current daylight conditions are already substandard.

**Proposal:** Omit the proposed insertion of “material”

**Chapter 35: Diversity of Housing**

Nil

**Chapter 36: Respecting Environmental Limits**

Nil

Page 67 **Glossary**

**Need to define “very small offices” as less than 100sqm of B1(a)**

**Social and Community Uses** These should also include: post offices, pharmacies, pubs and libraries.