

**Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington**

**Publication Stage Representation Form**

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This submission is being written in KCSC's capacity as the leading voice of the local voluntary and community sector. We are a registered charity that exists to support groups working with a range of communities within RBKC. We have a registered membership of 500 groups and an active membership of 220 groups. The groups work primarily with communities living in areas of high deprivation.

We consider the Core Strategy to be unsound because it is NOT justified or effective or consistent with national policy.

The following are the full details of why we consider the Core Strategy to be unsound.

**30 KEEPING LIFE LOCAL**

**Strategic Objective CO 1.1**

To be sound the following changes are required in accordance with the London Plan 2008:

- The word "affordable" must be added alongside accessible and widely available
- To highlight the role of the voluntary and community sector as integral to the provision of social infrastructure within the borough

London Plan Policy 3A.19 refers to boroughs working with the voluntary and community sector when preparing development plan documents so as to address their need for accessible and affordable accommodation. Usually this takes the

form of a community premises audit, mapping current provision and identifying future need, the findings from which are then given a policy hook within the Core Strategy.

PPS12 refers to the importance of assessing the need for and delivering social infrastructure with the voluntary and community sector an important stakeholder. The neglect of this also renders unsound chapter 37 Infrastructure and we wish this to be examined at the public hearings.

There are other weaknesses in the evidence base which render this policy unsound. The ethos of keeping life local should be applied to employment and housing. By integrating employment with housing people can live and work locally and options for achieving this should be evaluated

There should be an evaluation of employment zones to see to what extent they are geared towards local employment, with cross-references under Keeping Life Local.

There should have been an evaluation of the impact of estate renewal on keeping life local, as there is a view that estate renewal leads to the disintegration of existing communities.

### **Policy CK1 Social and Community Uses**

For the policy to be sound there needs to be an additional clause which addresses the need of the voluntary and community sector for accessible and affordable premises which meet their operational requirements, including access for disabled people.

The definition of social and community uses (30.3.4) needs to include open space and cultural facilities as required by London Plan Policy 3A.18 and 3.100.

b) We support the commitment to a new secondary school in North Kensington. It should be referred to as a community school or community college, reflecting that it is for those of all faiths and none and that it will provide adult education, with pre-employment training for local residents. These important details should be included in 30.2.3.

c ii) We regard the change from one social and community use to another to be unsound as currently worded. There needs to be protection for voluntary and community premises which could be lost to schools, hospitals, places of worship etc if this policy stands.

c iii) Also unsound is the policy of development being permitted where an existing social and community use can be removed so long as it is re-provided elsewhere in the borough. This should only be permitted where it can be demonstrated it is

supported by the local neighbourhood, an important protection for keeping life local and retaining the vitality of local communities.

### **Policy CK2 Local Shopping Facilities**

The protection given by this policy is weak. Local shopping facilities are about much more than convenience shopping, it is about access to services that are essential to keep life local. Services such as a post office, a pharmacist, a bank, a laundrette, a café and a greengrocer's. To make this policy sound a Local Needs Index should be included. In preparing this plan RBKC has used a Local Needs Index which identifies 11 key services.

The policy should also be strengthened by recognising that local shopping facilities are important to local economic activity.

### **Policy CK3 Walkable neighbourhoods and neighbourhood facilities**

We support walkable neighbourhoods, but regard the protection that is given by this policy as weak.

The policy should give the proximity to local services as set out in the text – a maximum 400 metres (5 minutes) and a maximum 800 metres (10 minutes) walking distance. We would like this to be expressed in a maximum distance as the distance people can walk in a set time varies considerably.

This policy should also refer to the local needs index, and identify services such as a GP, library, primary school and green space.

## **35 DIVERSITY OF HOUSING**

### **Strategic Objective CO 1.6**

The core strategy is unsound because it fails to cater for a variety of housing needs. No evidence or policy is provided on the housing needs of young people. There is concern that many young people have to move out of the borough because there are not enough options for them to stay when moving out of parental homes

No evidence is provided on the number of empty homes in the borough, by tenure and by location. Plans to redevelop the north are based on the notion that it is not as densely populated as the south of the borough. This assumption is unsound as it is based on the number of units but does not take into account occupancy rates, some wards in the south have up to 1 in 5 empty properties.

The stated aim of reducing polarisation between north and south in fact is unbalanced as this only means adding intermediate and market housing in wards where there is a higher proportion of social rented housing.

The Council's strategic focus on "diversity of housing in mixed communities" (35.1.1), is unsound when the need to increase the stock of social rented housing should come first

The strategic focus on adaptability and Lifetime Homes is incoherent without a guiding statement on Access needs to show a firmer commitment to Homes for All.

There should be a policy target on bringing empty homes into use. Reference should be made to the housing trajectory study which in 40.1.1 reports that over one-third of the annual housing target is being met by vacant dwellings.

### **Policy CH 1 Housing targets**

B Only 200 out of 600 new homes per year will be affordable (33%). There is not the evidence base to justify this policy and it does not follow London Plan 2008 policy which requires 50% affordable housing. The evidence in 35.3.10 is not reflected in policy CH 1.

Furthermore, the supporting text fails to provide evidence on overall housing need and does not report the findings of the SHMA. There is reference to the need within affordable housing (35.3.6), but not the share of need between the affordable and owner occupation tenures.

The target for affordable housing should be a minimum in the same way as the target for the total number of units is a minimum.

C We support this policy which follows the SHMA in deciding the split between social rented and intermediate housing.

### **Policy CH 2 Housing Diversity**

a) The policy on bed size (housing mix) is unsound as it contains no targets or proportions and fails to provide the strong steer towards family housing (3 beds +) as required by the SHMA. Without this, there is no policy hook for the output indicator on housing mix in 38.8.8.

5 bed units should be included as a category if diverse need is to be met.

The proportions in paragraphs 35.3.14 and 35.3.15 should be included as policy. In more general terms we propose 3 bed 35%, 4 bed 20% and 5 bed 10%.

j) We object to the policy of a sum being paid in lieu of affordable housing. This makes the core strategy unsound, preventing the achievement of a 50% affordable housing target.

l) We oppose the policy of never providing off site affordable housing in specific wards, which is contrary to housing need and choice and acts as a further bar on maximizing the delivery of affordable housing.

### **Policy CH 3 Protection of residential uses**

To make this policy sound there needs to be protection for social rented housing in the same way as market residential use is protected.

We believe that social rented housing and existing residents needs should be prioritised over creating retail opportunities. For example, residents from Portobello Ct are particularly concerned by plans to rebuild their estate to allow retail units to expand eastwards of Portobello Rd.

### **Policy CH 4 Estate Renewal**

The policy should refer to a compelling case that demonstrates long term benefits to existing residents, as well as to other stakeholders.

b) The guarantee should be that existing tenants have the right to return to rebuilt homes on the estate (if they wish) and this guarantee should extend to leaseholders who had bought their homes. The term “in the area” is too vague.

d) We are concerned about financial guarantees, given that redevelopment to a large extent is based on raising private sector funds. What if the money dries up or a developer goes bankrupt? There should have been an evaluation of the impact of the credit crunch on the proposed development sites.

e) This policy is unsound, as it suggests the disintegration of existing communities. There must be protection for existing estates and their autonomy as a balance to finance led mega projects.

To make the plan sound we are seeking the inclusion (in the monitoring chapter) of output indicators for the housing issues we have identified above.

## **5 KENSAL and 20 KENSAL GASWORKS**

### **CV 5 Vision for Kensal in 2028**

Development of the Kensal gasworks / Sainsbury’s site is desirable but only if it is a medium sized development at best, and without tall buildings. Community facilities and the retention of green open space should be an essential part of any development.

The vision's high density development is unsound. It would be dependent on Crossrail, because transport links are not currently good enough. In fact, we are concerned that the Council has already chosen a Crossrail solution before doing feasibility testing. Crossrail would need approx 12,000 journeys per day to be feasible which is considered unrealistic and undesirable.

For these reason, we have doubts about the delivery of Opportunity Area status (5.1.10).

The vision fails to mention the Kensal Employment Zone, and the light industrial uses, workshop spaces, creative and cultural industries and small business uses which the Employment Zone protects and which all make a significant contribution to local employment (more so than other economic sectors). These uses should be mentioned in the vision together with the sentiments in 5.3.16.

The Council seems to regard employment as a low priority, since *Fostering Vitality* is at the bottom of the list of strategic objectives to be achieved at Kensal. 5.3.17 reduces the size of the Kensal Employment Zone which is inconsistent with Policy CF 5 Employment Zones and unsound. Providing better access to employment opportunities is very important to us.

The vision regards "well-connected" solely in terms of being connected to central London. There is also a huge need for better public transport links within Kensal and between Kensal and the rest of the borough. It is suggested that bus routes could be extended up Ladbroke Grove to feed this site, as well as pedestrian and cycling improvements.

We consider unsound the absence of an evidence base for the poor public transport and employment barriers that exist in Kensal. It is surprising that the Core Strategy makes no mention about benefitting Dalgarno and Kensal East Side. Many of the social problems here are related to the relative isolation of the area. Therefore, better transport links into/out of the area should be a priority. Specific initiatives that encourage employment and training for local people in Dalgarno and Kensal East Side should also be encouraged.

Health facilities must be included as part of any development if it is to be judged sound. They are essential rather than desirable (5.3.8).

As an Opportunity Area, Kensal should have an Area Action Plan as the planning framework (rather than an SPG). This would give more weight to community involvement.

## **6 GOLBORNE and 21 WORNINGTON GREEN**

### **Policy CV Vision for Golborne and Trellick in 2028**

We support the emphasis on Golborne Road market. Golborne should be a special centre in its own right along with Portobello Road and its unique architectural history and diversity should be preserved. The area should be defined by the Golborne triangle, Westway Railway and Ladbroke Grove.

However, for the policy to be sound the core strategy must contain specific actions to ensure the sustainability of the Golborne market. The Core Strategy should refer to a vitality plan for the Golborne Area, with help for retailers and independent business through different initiatives including affordable business rates and improved signage and street lighting. There should be an L shaped market from Portobello continuing into Golborne. There is a need to brand Golborne market into 'Golborne Village' and restore and maintain the beautiful architecture of the buildings that date from the 1880s.

Policy on Wornington Green is unsound. The return of social housing from the proposed large scale redevelopment is negligible. There is no social justification for the upheaval that will be caused by the demolition of Wornington Green estate.

The density proposed is extremely high in an already highly populated area of K&C. We have concerns over the health impacts the proposed high density will have on the residents. A recent K&C PCT study showed there is great correlation between high density and physical/mental health.

The proposed Wornington Green development will have a negative impact on the area's infrastructure, public transport and amenities as the capacity to cope with current demand is limited. The failure to consider voluntary sector premises as an output from the section 106 is unsound.

To be sound there should be an increase in the amount of social housing and provision of additional voluntary sector premises and community facilities to meet the established local need. The re-located Athlone Gardens should be bigger than the current park to take account of the proposed increase in housing density on Wornington Green. Athlone Gardens should continue to be accessible to the whole Golborne community rather than just becoming a park for residents of the Estate.

## **9 LATIMER and 23 NORTH KENSINGTON SPORTS CENTRE**

### **CV 9 Vision for Latimer in 2028**

The vision is unsound because when it says "Latimer will be rebuilt" the vision ignores affordable housing provision and associated social infrastructure requirements, despite the evidence base and the policy imperative for making these the key priority.

The vision and text refer to the large scale redevelopment of housing estates, with re-working of the traditional urban structure. There is concern over large scale redevelopment and what will happen to residents during the re-development of their homes. Regeneration must increase the amount of Social Housing for which there is huge need. The absence of a commitment to social housing makes it impossible to support this policy.

In 9.3.12 and 9.3.13 there is support for redeveloping the Kensington Sports Centre site, so long as existing community facilities are re-provided and strengthened. The brief must give emphasis to the retention of the **public** swimming pool, the only one in North Kensington. The existing pool should be kept open until any new pool within the proposed leisure centre/academy development is opened. There should be a full-size swimming pool, at least as large as and preferably bigger than the current one.

The new school is supported but should be a co-educational state secondary school. The school should provide adult education, with pre-employment training for local residents a priority. It should be considered as an option for the Kensington Sports Centre site, possibly amalgamated with the sports centre.

The vision proposes a new shopping centre at Latimer Road station. This is unsound as it will not meet the day to day needs of the residents of the area.

Assessments of each of the local centres, several of which are struggling, should be included to provide a sound evidence base. In these local centres there is a lack of local shopping, specifically food shops, shops providing multi-cultural food and shops where you can purchase fresh fruit.

The policy we want to support is the provision of local shops throughout the area, which is more important than one large new retail centre at Latimer Road station. There should be priority given to affordable rents and low rate units for shops meeting local needs.

To be sound, the vision should refer to improved transport and community safety which are significant issues in Latimer. The evidence and options for this are:-

- Transport must improve with better bus links between east and west, and to the hospital, and pedestrian and cycle access to Westfield shopping centre
- The development of an over-ground station on North Pole Road should be evaluated as an option. There should be underground parking facilities available
- Community safety must be evaluated e.g. there is a lack of lighting around Latimer Road tube station and across the Westway.

In 9.3.5 a planning framework and master-plan for the Latimer area are proposed. We support these, so long as residents are extensively involved in shaping them.

To make the vision sustainable and sound any section 106 funds from estate renewal must be ring-fenced for investment in social housing and local amenities in Latimer.

## **10 and 26 EARLS COURT**

### **CV10 Vision for Earls Court in 2028**

The policy on Earls Court is unsound as no consideration has been given to the sustainability of the local residential community. There is no evidence base about the needs of the local residential community and how these needs have been responded to. These needs are set out below and were presented to the Local Authority at an earlier stage of the Plan:-

- All new developments at Earls Court should provide affordable housing, community facilities, and a youth sports centre which is affordable to use
- We need a community centre where people can meet and socialise. There are no community meeting spaces at present in Earls Court
- We need a swimming pool and after school clubs. There aren't any in the immediate area of Hammersmith & Fulham. The nearest is Chelsea, which is too far
- There are no places of worship for BME communities. For example, the nearest Mosque is far away and the nearest Ethiopian Church is in Battersea. The Council needs to provide prayer space and should join with Hammersmith & Fulham to carry out an assessment and make a wider case for premises for places of worship
- There is a need for a joint shopping & cultural area as at Queensway
- An affordable community nursery is needed. The Punch & Judy family centre closed due to the rent level rising and the new private nurseries are unaffordable
- Affordable small business spaces need to be available and especially targeted at ethnic minority groups, e.g. ethnic restaurants, money transfer shops, phone card booths

- Sustaining community groups with running costs, start-up grants and training support to achieve integration. Section 106 could make a contribution to these needs

As an Opportunity Area there should be a commitment to an Area Action Plan, which will give more weight to community involvement in the planning framework.