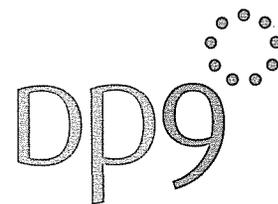


8 December 2009



Mr Peter Lerner
Executive Director of Planning and Borough Development
F.A.O. The Planning Policy Team
Royal Borough of Kensington and Chelsea
The Town Hall
Hornton Street
London
W8 7NX

100 Pall Mall
London SW1Y 5NQ
telephone 020 7004 1700
facsimile 020 7004 1790
www.dp9.co.uk

Dear Sirs

REPRESENTATIONS TO THE PROPOSED SUBMISSION CORE STRATEGY

On behalf of our clients, 828 Pte, we set out below comments to the above document currently published for public consultation.

Our clients are owners of a prominent building fronting Kensington High Street, and as such, have an interest in the Council's future policy direction for the site in the Local Development Framework and wish to be kept informed of the progress of the Council's Local Development Framework.

Chapter 11 Kensington High Street

This chapter of the document sets out the "Vision for Kensington High Street in 2028" under Policy CV11. The vision outlines that the centre will continue its tradition of serving residents, workers and visitors through a range of food and convenience retailing and a destination for fashion and niche markets.

The 'vision' however, does not make reference to the potential of the centre to provide leisure type uses, as set out in PPS6 which will add to the vitality of the centre in serving residents and visitors alike. Accordingly, our clients consider that Policy CV11 should include references to the full range of appropriate town centre uses, including leisure uses within Kensington High Street.

Our clients note that Kensington High Street Underground Station is identified in the 'Key Issues and Potential Opportunities' plan as a 'potential development opportunity.' Our clients welcome the recognition in the document that the station has the potential for redevelopment for a mix of uses including retail on the ground floor level with town centre uses on the upper floors of the existing arcade.

Policy CP10 refers to the Council seeking the continued success of the High Street as a quality shopping street. Again, other appropriate town centre uses as set out in PPS6, such as leisure type uses should also be referred to in order to improve the character of the High Street.



Policy CF2 - Diversity within Town Centres

Paragraph 31.3.20 sets out the guidance in PPS6 that states that main town centre uses includes, amongst others, leisure and entertainment uses.

Policy CF3 referring to ‘Diversity of uses within Town Centres’ does not refer to the full range of town centre uses, but rather advises that a diverse range of shops will be “supported, but not dominated by, a range of complimentary town centre uses.” Accordingly, our clients consider that that policy should be amended to refer to the provision of all town centre uses, including leisure and entertainment uses, and not just retail use.

Policy CF5 - Location of Business Uses

Paragraph 31.3.2 advises that in respect of the supply of office floorspace, there is a net addition of 46,000 sqm (500,000 sqft) under construction and from outstanding planning permissions across the Borough. The document advises that this level of building will meet office demand until 2017.

The Council therefore recognises that a further 23,000 sqm of office floorspace needs to be developed within the Borough, within the plan period for the predicted need to be met. The Council has allocated 20,000 sqm (215,000 sqft) of business floor space within the Strategic Site Allocations for the Earl's Court and the Kensal Gasworks sites. Any remaining need would be likely to be met by other smaller windfall sites, particularly by very small and small office developments across the Borough.

Policy CF5 seeks to protect medium sized offices (300 sqm – 1,000 sqm) in town centres. However, the policy is too restrictive in protecting office use, as some premises may be outdated or unsuitable for continued office use and so should be re-used or redeveloped for other alternative uses.

Furthermore, existing office buildings may be in an unsuitable location, for example, within close proximity to residential uses which may cause amenity issues in respect of noise and disturbance to local residents. In such cases, where the office building is poorly located and is not in a suitable office location and is no longer considered suitable for office use, the policy should refer to the potential for re-use or redevelopment of medium offices for alternative uses.

Housing Targets – Policy CH1

We note that criterion “c” of Policy CH1 advises that the Council will “require affordable housing tenures to be provided such that they work towards a Borough-wide target of 85% social rented housing and 15% Intermediate housing.”

Our clients consider that the wording of this criterion of the policy does not provide for sufficient flexibility in the application of the policy. The wording of criterion “c” of the policy should be amended to make reference that the Council will “generally seek the provision of” affordable housing.



Furthermore, the proposed tenure mix should accord with the London Housing Strategy and recognise the overarching principle to provide mixed and balanced communities, as advocated in PPS3. As such, the proposed tenure mix should be re-worded to refer to “60% social rented housing and 40% Intermediate housing.”

Housing Diversity – Policy CH2

This policy sets out the Council’s direction for the provision of affordable housing in the Borough. The policy should recognise that the key priority is the delivery of both private and affordable new homes which contribute to mixed and balanced communities, as set out in PPS3.

The policy should reflect the mechanisms by which affordable housing is calculated in order to provide consistency with PPS3 and the London Plan. Provision as a proportion of habitable rooms or units provides sufficient flexibility for the appropriate amount of affordable housing to be advanced on differing development schemes and on this basis a departure from the London Plan position (to a floorspace calculation) is not justified.

As such, criterion “i”. of the policy should be deleted and re-worded to state that the Council will target the provision of up to 50% of either habitable room numbers or unit numbers as affordable housing provision taking into account contributions towards the Borough target from other sources of supply, the need to promote rather than restrain residential development, the viability of the proposals and site specific circumstances including the availability of public subsidy.

We would be grateful for your acknowledgement of receipt of these representations. Should you wish to discuss any of the above comments with us please contact Julian Shirley of this office.

Yours sincerely,

DP9