

Drivers Jonas LLP  
85 King William Street  
London  
EC4N 7BL  
Tel 020 7896 8000  
Fax 020 7896 8001  
www.driversjonas.com

## Planning Services

Royal Borough of Kensington and Chelsea  
Room 328  
Town Hall  
Hornton Street  
London  
W8 7NX

Our ref NT/AD/67256

9 December 2009

Dear Sir

## Natural History Museum Representations to the Royal Borough of Kensington and Chelsea Proposed Submission Core Strategy

We write on behalf of our client, the Natural History Museum, in relation to the 'Proposed Submission Core Strategy with a particular Focus on North Kensington,' which the Royal Borough of Kensington and Chelsea (RBKC) have recently published for consultation.

This letter is further to our representations to the previous round of consultation dated 4<sup>th</sup> September 2009.

## Comments and Response

### Policy Context

The Museum's comments are based on Planning Policy Statement 12: '*Creating strong safe and prosperous communities through Local Spatial Planning*' (PPS12, June 2008) and it is considered that the Proposed Submission draft of the Core Strategy does not meet the tests of 'soundness' as set out in this document.

PPS12 (para. 4.52) states that "*to be 'sound' a Core Strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.*"

Paragraph 4.36 states that for a Core Strategy to be justified, it must be:

- founded on a robust and credible evidence base; and
- the most appropriate strategy when considered against the reasonable alternatives.

The document goes on to state:

*"It is therefore essential that core strategies are based on thorough evidence. The evidence base should contain two elements:  
- Participation: evidence of the views of the local community and others who have a stake in the future of the area  
- Research/ fact finding: evidence"*

Our comments below are based on the above criteria for the assessment of 'soundness' of Core Strategies.

## Commentary

Our comments relate specifically to Section 1, Part 12 of the Core Strategy which relates to the 'Key Issues and Potential Opportunities' in relation to South Kensington.

The Natural History Museum is an important consideration in the future of this area and forms a key part of the identified Cultural Quarter and Exhibition Road proposals. On this basis, as a key stake-holder, it is critical that the Museum's views are taken into account and incorporated into the final Core Strategy. This approach to participation in order to provide a firm evidence base is set out within PPS12.

The Consultation Draft of the Core Strategy, para. 12.3.3 stated in relation to the Natural History Museum:

*"[the Grounds] needs better management so that it's primary purpose remains a public open space providing essential 'breathing space' for visitors."*

The Museum made substantial representations to the Consultation Draft (enclosed) and in particular to the above statement that the Museum Grounds are primarily 'public open space.' This is incorrect. The Grounds are private space for the use of visitors of the Museum and whilst they provide a function as open space, this is not public and is not their primary purpose. This was set out in detail in the Museum's representations.

Notwithstanding the Museum's representations, the Proposed Submission document does not amend the above wording and still states that the Grounds' primary purpose should remain as public open space. The Council Officer's formal response to the submitted comments incorrectly states:

*"The Council considers that the space outside the Natural History museum is public open space."*

On this basis, it is considered that the Council have not adequately undertaken their evidence collection by not taking into account the facts presented by a key stake-holder. The potential risk of this paragraph being included is that the Core Strategy does not reflect the current or actual role of the Museum's Grounds.

Therefore this paragraph is not 'justified' as required by PPS12.

On this basis, in order to address this issue, we recommend that the following wording is substituted:

*"The East Lawn of the Natural History Museum, on the corner of Exhibition Road and Cromwell Road is used as an event space for the Museum. The forthcoming Grounds Strategy, prepared by the Museum, will set out a long term vision and management plan to review the use of this area and the wider Museum grounds."*

*"This Strategy will review the use of the grounds as open space for visitors as well as assessing suitable areas to accommodate events which are important to the Museum and vital to its commercial viability. Any use of this space must respect the setting of the Grade I Listed Waterhouse Building."*

## Conclusion

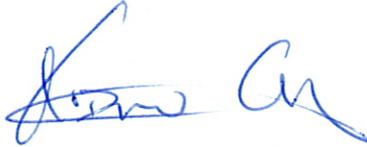
The Natural History Museum is generally supportive of the policies and vision within the Core Strategy and is pleased that RBKC have made a number of references to the importance of the Museum within the vision for South Kensington.

The Natural History Museum does however have significant concerns in relation to the wording of para. 12.3.3 of the proposed Submission Draft and in particular concerns that the Council have not based the above section of the Core Strategy on a credible evidence base as required by PPS12.

We trust that the above comments will be taken into account, however, please do not hesitate to contact Adam Donovan (020 7896 8263) or me should you have any queries or require any further information.

In addition, we reserve the right to submit further representations and would be grateful if you could keep us up to date on the progress of this document.

Yours faithfully



pp **Nick Taylor**  
**for DRIVERS JONAS LLP**

nicktaylor@driversjonas.com  
Tel: 0207 896 8086

CC: Kevin Rellis      Natural History Museum  
David Sanders      Natural History Museum

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

**Development Plan Document**

**Local Development Framework**

**Publication Stage Representation Form**

Please e-mail this form to: [planningpolicy@rbkc.gov.uk](mailto:planningpolicy@rbkc.gov.uk)

*Alternatively send this form to:*

Planning Services  
Policy Team  
Room 328  
The Town Hall  
Hornton Street  
London  
W8 7NX

*For further information:*

Visit our website at: <http://ldf-consult.rbkc.gov.uk>

Phone the LDF hotline on: 020 7361 3879

**Responses must be received no later than midday Thursday 10 December 2009**

**Personal Details**

**Name:** NICK TAYLOR.....

**Organisation:** DRIVERS JONAS LLP.....

**Address:** CAPITAL HOUSE.....

85 KING WILLIAM STREET

LONDON, EC4N 7BL

**Phone:** 0207 896 8086.....

**E-mail:** NICKTAYLOR@DRIVERSJONAS.COM.....

To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

“Justified” means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

“Consistent with National Policy” means that it is consistent with government guidance contained within Planning Policy Guidance and Planning Policy Statements

Do you consider the core strategy to be legally compliant?

Yes

No

Do you consider the core strategy to be Sound?

*Please tick the appropriate box*

**If you have selected YES and you wish to support the legal compliance or soundness of the core strategy, please be as precise as possible when setting out your comments below**

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

**Please attach additional pages as required**

**If you have selected NO do you consider the core strategy to be unsound because it is not.**

**Justified**

**Effective**

**Consistent with national policy**

*Please tick the appropriate box*

Please give details of why you consider the core strategy to be unsound or not legally compliant. Please be as precise as possible when setting out your comments below.

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

PLEASE REFER TO SUPPORTING REPRESENTATIONS.

**Please attach additional pages as required**