

Comment

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Event Name	Proposed Submission Core Strategy
Comment by	Mr Martyn Baker
Comment ID	PSubCS4
Response Date	08/12/09 17:32
Consultation Point	CV1 Vision for the Royal Borough: Building on Success (View)
Status	Processed
Submission Type	Web
Version	0.6

Do you consider this part of the core strategy to be Legally compliant?

Do you consider this part of the core strategy to be Sound? . No

Do you consider this part of the core strategy to be unsound because it is not: . Justified
. Effective
. Consistent with national policy

You have selected NO

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

The Core Strategy needs further refinement if it is to be a sound strategy because: -a) its Vision, and its rather too narrow range of key policies (cv1-3) do not fully reflect the particular characteristics and challenges of the RBK&C in terms of economic as well as social and environmental sustainability.b) A too limited range of numerical targets are laid out in the summary of the Council's policies on pages 11-16. Without more quantification and more specific target dates it will prove difficult to drive forward the Core Strategy effectively. The effectiveness of its policies in securing the sustainable development of the Borough will be difficult to measure in an accountable way. c) Its low key approach to economic development in terms of Work and Business (the last of eight themes in the third community strategy for the Borough and only dealt with on pages 74-80) is not fully consistent with the Mayor's recently published draft replacement London Plan with its major emphasis on supporting London's development and employment growth, as further set out in the Mayor's new draft Economic Development Strategy

also published for public consultation in mid-October. This recognises that alongside building more housing there is a need to create more workspace together with additional social infrastructure.

Because RBK&C is already the most densely populated Borough in England & Wales with so much pressure on it by residential developers to maximise the return from scarce sites by achieving a change of use, there is an over-riding need to adopt a Core Strategy which signals a clear determination to resist further loss of sites designated for office, retail, small business, leisure and educational use, because all of such uses provide employment space for a growing population. Rigorous policies spelt out more clearly within the Core Strategy are needed to avoid further residential developments which will overload the social and physical infrastructure of the Borough. Ideally there should be a cap on further residential developments, at least in those wards with residential densities four times the London-wide average density, until such time as the social, recreational, educational and employment needs of the Borough's existing population have been adequately catered for, its population having increased substantially from the last census to reach a total of 178000 according to ONS estimates.

In terms of specific measurable targets there is a need to match the house building targets specified in the Core Strategy in response to the last London Plan requirements by setting out an equivalent target to generate the additional work space needed to accommodate the additional working age population to be accommodated in this new housing.

If the Core Strategy and its policy priorities and specific targets are to be deemed sound the exceptional challenges facing the RBK&C need to be spelt out more clearly so that the risks and opportunities for this community can be better addressed in conformity with the Mayor's latest draft policies. Naturally, the RBK&C cannot control many underlying trends (in particular growth in population, in employment/unemployment, in traffic levels, in congestion and pollution, in demand for primary and secondary school places, in the need for more recreational space and leisure services, in the requirements for greater health care for the sick and elderly and in the provision of social benefits for the disadvantaged and those unable to work) and cannot accurately predict their speed of development, yet (working in partnership with many other public bodies with wider responsibilities for particular services and infrastructure investment decisions) the Council should have an overall perspective as to the feasibility of meeting these challenges in a more or less sustainable way within the constrained spatial limits of Kensington and Chelsea. To be authentic this unique perspective needs to be well grounded in a recognition of what makes the RBK&C distinctly different from other boroughs particularly in Inner London. The perspective provided by the Core Strategy is not entirely sound because it does not sufficiently take into account the following key characteristics as the basis for advancing effective policies: - 1) Not only is the RBK&C the most densely populated borough in England and Wales (with twice the number of people per hectare as in Wandsworth across the Thames) several wards have a density five times the overall London average, and overall 83% of properties in the Borough are flats. 2) Despite having some of the lowest levels of car ownership in the Country the Borough suffers from high traffic volumes generated in particular by through traffic and by three secondary schools (Faith schools) importing most of their pupils from other boroughs. This means that 59% of students at the RBK&C's four secondary schools live in other boroughs. This also means that in turn 23% of RBK&C's children have to commute to maintained secondary schools in other boroughs, which also adds to the considerable volume of traffic during term times. 3) Topographically RBK&C is most clearly defined by its beautiful river frontage and the historic and architecturally distinguished buildings and public gardens which look onto the Thames. Yet this major amenity area is fast being blighted by the increasing traffic and pollution on the A3212 (Cheyne Walk/Chelsea Embankment) generated by the Western Extension of the Congestion Charging Zone which has increasingly been turning this road into a slow moving "urban motorway". 4) Although described as a high-density area the Borough accommodates many non-residential buildings which provide essential employment space, not just in three specific zones but in major high streets, in local shops, restaurants and pubs, in substantial hotels, at major cultural attractions, in the limited number of public parks and sports facilities and amongst the wide range of often small, specialist enterprises providing high value business, consultancy and design services. 5) The borough has already "lost" a good deal of educational, cultural and other employment generating sites to "upmarket" residential use as a result of planning decisions which have turned the St Mark and St John College, Chelsea Art School and Glebe Place into exclusive housing developments.

Taking these key characteristics into account a crucial consideration must surely be how to preserve and, in effect, ration the finite amount of land left for "development" in this most densely populated borough. The reasons for giving employment space as much priority as residential space are spelt out in the Mayor's latest drafts but there is an over-riding economic argument in the case of RBK&C. This

is that only 70% of the Borough's working age population was economically active according to Facts and Figures about RBK&C 2008. This compares badly with the overall average for London of 75%. Indeed HMG is known to want this London wide percentage increased to match the percentage for England as a whole (78.6% in 2007) and for the national rate to move upwards to 80% in order to harness more of the economic potential of the Country. Among reasons militating against fuller employment (prior to the current recession) included the limited amount of space devoted to employment in most London boroughs; the continuing loss to residential use of sites previously devoted to employment (as a result of planning authorities not resisting change of use applications); and the time and expense involved in commuting often long distances to areas of employment. This must be environmentally undesirable since it adds to pollution and excessive energy use. Consequently it must be in the interests of this Borough's sustainability both economically and socially for a specific policy to be adopted as part of the Core Strategy which would seek to achieve a higher percentage of economically active residents (at least reaching the overall London average) through the provision of additional work space in the Borough, or at the very least the safeguarding of all existing non-residential space in RBK&C, non-residential space being defined as all existing space for office, retail, educational, health, social and other public services, as well as artistic and leisure purposes because activities under these headings all involve employment of one sort or another. As a measure of the success of such a policy, targets should be set for the number of job spaces preserved and newly created through the Borough's planning and regenerative efforts.

Given the wealth of RBK&C it is an unattractive fact that the Borough's unemployment amongst those economically active (5.5%) was in 2007 higher than the average for England as a whole (5.4%) although lower than the overall London rate of 6.8%. The Core Strategy should contain stronger policies to find young people in particular pathways into work and these policies should be matched by more measures to encourage local employment initiatives to make available suitable premises for enterprising, new and growing businesses. In summary further targets should be set to reduce the unemployment rate progressively, and to reduce the percentage of the Borough's working age population which is economically inactive (29.4%) since this amounted to 36,368 residents in 2007, meaning that of the Borough's total population slightly less than 50% were in employment or seeking employment. This is hardly conducive to the economic leave alone social sustainability of the RBK&C over the longer term unless this trend is reversed

Officer's response to comments

In response to point a) above: It is assumed reference should be to CP1-3 (not CV1-3). These policies are not intended to cover the full breadth of the plan. The characteristics and challenges are reflected in the Strategic Objectives (CO1-7).

In response to point b) above: Pages 11-16 are summarising the plan. They are not the plan itself. They are intended to help the lay person understand the 'story' of the plan. Where numbers are relevant they are included. There is a clear policy on the quantum of development (CP1) and a full chapter on monitoring (Chapter 38).

In response to point c) above: it is not clear if pages 74-80 are referencing the community strategy or the core strategy. If the latter, they refer to the chapter on Latimer. One of the seven strategic objectives of the plan is to 'foster vitality'. This sets out how important the business and retail sector is to the borough. It is not possible therefore to say that the plan takes a 'low key' approach to economic development. In addition, the development management policies in Chapter 31 protect 'employment' uses and allow for new employment uses to be established. The RBK&C Core Strategy responds to the locally distinct circumstances of the borough in promoting small businesses in particular. It is fully in accordance with both the existing and revised London Plans.

In response to the second paragraph: The core strategy does just this. Policies within the development management section, chapter 31 in particular, protect non-residential uses from change of use to residential, reversing the situation with the existing UDP. There cannot, however, be a cap on further residential development because of the need to comply with the housing targets set in the London Plan. However, the vast majority of new housing will be accommodated on strategic sites where new infrastructure will also be provided.

In response to the third paragraph: The plan protects existing, and permits the provision of new employment uses. It takes a strong approach with regard to the employment zones, resisting their

slow evolution into residential areas, to facilitate premises suitable for small businesses in particular, which the evidence shows employ a disproportionately large number of borough residents.

In response to the upper part of the fourth paragraph: the plan pays close attention to the locally distinct characteristics of the borough. The vision is based upon those distinct characteristics, and the strategic objectives underpin the delivery of the vision.

In response to point 1) above: the plan makes specific reference to the density of the borough, particularly in relation the appropriate form of future developments.

In response to point 2) above: The plan specifically addresses the issue of the schooling of the borough's children by making an allocation for a new secondary school in the north of the borough.

In response to point 3) above: It is agreed that the Thames is an important element of the quality of the borough. The Thames policy area is already on the UDP proposals map.

In response to 4) above: it is agreed that the borough is much more than a residential suburb. This is why the strategic objective of fostering vitality is included within the plan, and a suite of policies to protect the non-residential uses of the borough.

In response to 5) above, the plan puts in place a suite of policies to protect the non-residential uses of the borough.

In response to the fifth and sixth paragraphs: whilst only 70% of the borough's working age population is economically active, this is not the same as 30% of the borough looking for work. As is set out in chapter 2, the borough has higher than average incomes, more managerial and professional staff, and high numbers of the population with degrees. The spatial distribution shows that issues of access to jobs is concentrated in (but not exclusive to) the north of the borough, and this is where the plan is focusing attention in terms of regeneration.

Officer's Recommendations

In response to point a) above: Recommendation: no change

In response to point b) above: Recommendation: no change

In response to point c) above: Recommendation: no change

In response to the second paragraph: Recommendation: no change

In response to the third paragraph: Recommendation: no change

In response the upper part of the fourth paragraph: Recommendation: no change

In response to point 1) above: Recommendation: no change

In response to point 2) above: Recommendation: no change

In response to point 3) above: Recommendation: no change

In response to point 4) above: Recommendation: no change

In response to point 5) above: Recommendation: no change

In response to the fifth and sixth paragraphs : Recommendation: include in Chapter 2 information on the economic activity and unemployment of the borough, to clarify this matter.