

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

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 10th December 2009

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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

	Yes	No
Do you consider the core strategy to be legally compliant?	✓	
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.

**Policy CF 5
Location of Business Uses**

Please attach additional pages as required

The Core Strategy is considered to be unsound because Policy CF5 is inconsistent with national policy as expressed in Planning Policy Statement 6: Planning for Town Centres (PPS6). Neither is the policy considered to be the most appropriate strategy compared to alternatives and, additionally, is not flexible.

PPS6 lists the main town centre uses. These are retail, leisure and entertainment (including cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls), offices, arts, culture and tourism (including theatres, museums, galleries, concert halls, hotels and conference facilities). Additionally, housing is recognised as an important element in mixed-use, multi-storey developments.

The Government's key objective for town centres is to promote their vitality and viability by (i) planning for the growth and development of existing centres and (ii) promoting and enhancing existing centres, by focussing development in such centres and encouraging a wide range of services in a good environment, accessible to all (PPS6, paragraph 1.3). Attention is drawn particularly to the encouragement of a wide range of services.

Paragraph 2.22 of PPS6 states:

"A diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. Local planning authorities should encourage diversification of uses in the town centre as a whole, and ensure that tourism, leisure and cultural activities, which appeal to a wide range of age and social groups, are dispersed throughout the centre."

Policy CF5 provides too great an emphasis on the protection of offices in the higher order town centres at the expense of achieving a diversity of uses envisaged by PPS6.

In preparing their development plan documents local planning authorities are required to assess not only the need for office floorspace over the development plan period but should also consider the needs for other main town centre uses (PPS3, paragraphs 2.39 and 2.40). Policies CF7 and CF8 of the Core Strategy lend support to the development of arts and cultural uses and new hotels within the higher order town centres, but Policy CF5 would not permit such development if it resulted in the loss of any town centre offices. The only loss of town centre offices that would be permissible under Policy CF5 would be to provide retail floorspace but this is not a realistic alternative on upper floors in the majority of cases. This approach is too restrictive and is not consistent with achieving a diversity of uses as envisaged by PPS6.
