

## Neighbourhood Community Infrastructure Levy (NCIL) – Community Priorities Consultation

### CONSULTATION SCHEDULE AND COUNCIL RESPONSE, APRIL 2020

The tables below set out the responses received on the NCIL Community Priorities Consultation which was undertaken for six-weeks between 11 February to 24 March 2020. The last column titled “Council’s Response” also sets out areas where the text will be changed in the final document. The changed/intended to change text is shown in blue, underlined and emboldened text.

Please note that the responses have been recorded as received from respondents.

Question 1: Please tell us your ward name

Question 2: Please tell us what your priorities are for your ward/neighbourhood area?

In total 31 responses were received through the Council’s consultation portal. 15 residents, 7 residents associations, 8 organisations and 1 RBKC Ward Councillor responded. 27 of the respondents answered question 1 and 2, in some responses the priorities chosen applied to more than one ward.

Transport for London selected Transport and Highways as a priority for all wards, the consultation is to seek the community’s views on priorities and therefore has not been included in the table below. Kensington Society selected all priorities for all wards except Chelsea Riverside, Royal Hospital and Stanley wards. Kensington Society represent residents’ in the borough and therefore their views have been included in the table. The table also includes votes from those who answered question 3.

The table below shows the number of times each priority was selected by ward from responses through the Council’s consultation portal:

Ward	Community Safety	Health	Community Facilities	Sports & Leisure	Education	Affordable Housing	Policing resource and Emergency Services	Streetscape	Transport & Highways	Cultural Facilities	Biodiversity	Air Quality	Parks and Open Spaces	Waste	Employment and Skills
Abingdon	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Brompton and Hans Town	2	2	2	2	2	2	2	1	2	1	2	2	2	2	2
Campden	5	1	1	1	1	1	3	3	5	1	2	2	3	1	1
Chelsea Riverside			1								1	1	1		
Colville	1	1	1	1	1	1	2	2	2	1	1	1	1	2	1
Courtfield	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Dalgarno	1	1	2	1	1	1	1	2	2	1	2	1	2	1	1
Earl's Court	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Golborne	2	1	1	2	1	1	1	1	2	1	1	1	2	1	1
Holland	5	2	1	1	1	2	5	5	8	1	4	5	5	2	1
Norland	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Notting Dale	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Pembridge	2	1	1	1	1	1	2	2	2	1	1	2	2	2	1
Queen's Gate	2	1	2	1	1	1	1	2	2	1	1	2	1	2	1
Redcliffe	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Royal Hospital															
St Helen's	1	1	2	1	1	1	1	2	2	1	2	1	1	1	1

Ward	Community Safety	Health	Community Facilities	Sports & Leisure	Education	Affordable Housing	Policing resource and Emergency Services	Streetscape	Transport & Highways	Cultural Facilities	Biodiversity	Air Quality	Parks and Open Spaces	Waste	Employment and Skills
<b>Stanley</b>							1			1			1	1	
<b>Total</b>	26	17	20	17	16	17	24	25	30	16	23	24	27	21	16

Table A. Community Priorities by ward identified through Council's consultation portal

A separate consultation summary with analysis on the Poll has also been prepared. Top priorities for each ward are:

Ward	Priorities
<b>Abingdon</b>	Air Quality, Health, Streetscape, Transport & Highways
<b>Brompton and Hans Town</b>	Policing Resource and Emergency Services, Community Safety, Parks and Open Spaces, Transport & Highways, Community Facilities
<b>Campden</b>	Community Safety, Policing Resources and Emergency Services, Air Quality, Streetscape, Parks and Open Spaces
<b>Chelsea Riverside</b>	Community Safety, Policing Resources and Emergency Service, Air Quality, Streetscape, Parks and Open Spaces
<b>Colville</b>	Education, Parks and Open Spaces, Affordable Housing, Air Quality, Community Safety
<b>Courtfield</b>	Streetscape, Waste, Policing Resources and Emergency Services, Air Quality, Parks and Open Spaces
<b>Dalgarno</b>	Policing Resources and Emergency Services, Community Safety, Health, Education, Employment and Training
<b>Earl's Court</b>	Air Quality, Policing Resources and Emergency Services, Community Safety, Streetscape, Health
<b>Golborne</b>	Parks and Open Spaces, Affordable Housing, Health, Education, Policing Resources and Emergency Services,
<b>Holland</b>	Community Safety, Air Quality, Policing Resources and Emergency Services, Parks and Opens Spaces, Transport and Emergency Services
<b>Norland</b>	Policing Resources and Emergency Services, Parks and Open Spaces, Air Quality, Biodiversity, Streetscape
<b>Notting Dale</b>	Affordable Housing, Air Quality, Streetscape, Health, Policing Resources and Emergency Services
<b>Pembridge</b>	Community Safety, Streetscape, Policing Resources and Emergency Services, Parks and Open Spaces, Health

<b>Queen's Gate</b>	Air Quality, Parks and Open Spaces, Streetscape, Policing Resources and Emergency Services, Education
<b>Redcliffe</b>	Policing Resources and Emergency Services, Community Safety, Streetscape, Waste, Biodiversity
<b>Royal Hospital</b>	Policing Resources and Emergency Services, Community Safety, Air Quality, Health, Affordable Housing
<b>St Helen's</b>	Health, Biodiversity, Policing Resources and Emergency Services, Affordable Housing
<b>Stanley</b>	Policing Resources and Emergency Services, Affordable Housing, Parks and Open Spaces, Health, Community

Table B. Community Priorities by ward identified through poll survey

The combined results of both consultations set out below.

Ward	Community Safety	Health	Community Facilities	Sports & Leisure	Education	Affordable Housing	Policing resource and Emergency Services	Streetscape	Transport & Highways	Cultural Facilities	Biodiversity	Air Quality	Parks and Open Spaces	Waste	Employment and Skills
<b>Abingdon</b>	7	7	5	6	6	5	5	7	7	5	3	8	6	6	3
<b>Brompton and Hans Town</b>	10	6	7	5	4	5	11	3	8	4	4	6	8	6	2
<b>Campden</b>	13	8	5	5	7	7	10	10	12	7	6	10	14	8	4
<b>Chelsea Riverside</b>	10	6	3	5	3	3	9	8	7	5	4	10	8	2	3
<b>Colville</b>	14	13	12	11	17	15	13	14	9	10	9	15	16	12	9
<b>Courtfield</b>	6	5	4	3	4	3	7	9	5	5	5	7	7	8	1
<b>Dalgarno</b>	6	5	4	2	5	4	6	5	4	3	4	5	6	4	5
<b>Earl's Court</b>	9	7	7	6	6	6	9	9	4	5	4	10	6	6	5
<b>Golborne</b>	8	10	9	6	10	11	9	7	6	9	4	8	13	8	5
<b>Holland</b>	31	19	18	11	12	15	28	24	30	14	15	29	28	21	10

Ward	Community Safety	Health	Community Facilities	Sports & Leisure	Education	Affordable Housing	Policing resource and Emergency Services	Streetscape	Transport & Highways	Cultural Facilities	Biodiversity	Air Quality	Parks and Open Spaces	Waste	Employment and Skills
Norland	5	5	7	4	6	6	8	8	5	3	8	8	8	6	4
Notting Dale	9	11	8	5	9	13	10	13	5	7	7	13	8	6	7
Pembridge	8	5	2	3	3	5	7	8	3	5	3	6	7	3	2
Queen's Gate	5	4	3	2	5	5	5	7	3	5	4	7	6	5	2
Redcliffe	9	5	2	2	4	3	9	8	4	4	7	5	6	7	3
Royal Hospital	7	6	3	4	4	6	7	6	5	2	3	7	3	3	3
St Helen's	7	9	8	6	6	8	8	9	5	8	10	7	7	5	6
Stanley	3	3	2	2	2	4	5	3	3	2	0	3	5	2	1
<b>Total</b>	166	134	109	88	113	124	165	157	124	103	100	164	162	118	75

Table C. Community Priorities by ward (combined results of both consultation methods)

**Question 3: If your top priorities are not reflected by any of the above, please tell us what they are?**

Name	Comment	Response
Canal and Rivers Trust (Claire McLean)	Improvement of Grand Union Canal and its towpath - Resurfacing, access improvements (pedestrian/cyclist access points onto the towpath), planting, community gardens.	Thank you, these examples fall within the suggested priorities Transport and Highways and Parks

Name	Comment	Response
Dalgarno		<p>and Open Spaces.</p> <p>The Council encourages such projects to be put forward for consideration.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Friends of Holland Park (J Kettlewell)</p> <p>Holland</p>	Security lighting in parks	<p>Thank you, this example falls within the suggested priorities Community Safety and Parks and Open Spaces.</p> <p>The Council encourages such projects to be put forward for consideration.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Ladbroke Association (Sophia Lambert)</p> <p>Colville, Norland,</p>	We think the list of priorities covers the ground well.	Support is noted.

Name	Comment	Response
Notting Dale and Pembridge		
Natural England (Sharon Jenkins)	Natural England have no comments to make on this consultation.	Noted.
Shala Kaussari-Dick Campden	Security - CCTV, Traffic calming - too much traffic, used as a shortcut by heavy vehicles, Pollution - too much traffic causing noise and air pollution	<p>Thank you, these examples fall within the overarching priorities Community Safety, Transport and Highways, and Air Pollution. The additional priority of noise pollution can fall within the suggested priority Health.</p> <p>The Council encourages such projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
St Quintin And Woodlands Neighbourhood Forum and St Helens Residents Association (Henry Peterson)	Community activity - Preparation or review and updating of a neighbourhood plan or of a conservation area management plan	The National Planning Practice Guidance on Community Infrastructure Levy Paragraph 145 states that " <i>Areas could use some of the neighbourhood pot [NCIL] to develop a neighbourhood plan where it would support</i>

Name	Comment	Response
Dalgarno, St Helen's		<p><i>development by addressing the demands that development places on the area."</i></p> <p>NCIL funds may be used to prepare, review or update neighbourhood plans where it would support development by addressing the demands that development places on the area.</p> <p>New paragraph 2.10:</p> <p><u><a href="#">NCIL funds could be used to develop a neighbourhood plan where it would support development by addressing the demands that development places on the area.</a></u></p>
Simeon Nnyombi Golborne	<p>Community Facilities &amp; Parks and Open Spaces - Play Area for children living at 84 Southern Row within the Pocket park or the terrace of the property</p> <p>Transport and Highways - More Car share parking bays within the vicinity or basement parking of 84 Southern Row.</p>	<p>Thank you, these examples fall within the suggested priorities Community Facilities, Parks and Open Spaces, Transport and Highways.</p> <p>The Council encourages such projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you</p>

Name	Comment	Response
		<p>can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Andrea Ruggeri Holland</p>	<p>Attached a short note to highlight our concerns on the amount of traffic going through our streets and the consequent level of noise and pollution. Lack of safety caused by frequent cars speeding is also cause of concern.</p> <p>We would support the installation of speed bumps and the closure of the Holland Park roads to through traffic by closing one junction of the roads with Holland Park Avenue, de facto transforming Holland Park into a dead end / cul de sac.</p> <p>Note reads: Lower traffic and reduce speed, speed bumps and close access from Holland Park Avenue (dead end)</p>	<p>Thank you, this example falls within the suggested priorities Transport and Highways and Health.</p> <p>The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Hilary Wagon Holland</p>	<p>Since the imposed lockdown the quality of our air is definitely better and my bid on the spending of the NCIL monies errs on the side of traffic calming.</p> <p>One of the Holland Parks is already part of a 20 mph trial scheme but its hard to enforce this limit without other measures to back it up and <u>make</u> the speeding cars forcibly slow down. This could be speed bumps that wouldn't impede a car doing 20 mph but would definitely cause damage to the undercarriage of cars doing 50 (I am not exaggerating here).</p> <p>Illuminated signs showing your driving speed would be welcome so as to remind drivers of their obligations.</p>	<p>Thank you, these examples fall within the suggested priorities Transport and Highways, Policing Resources and Emergency Services, and Streetscape.</p> <p>The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you</p>

Name	Comment	Response
	<p>Basically, anything that would slow the traffic (whilst still keeping it moving) would be helpful and would encourage hobby cyclists to take to the back roads.</p> <p>I appreciate that there must be an allowance made for emergency vehicles but assume that they would always use the main roads and so side roads and residential streets would benefit from any traffic calming measures, including road narrowing at the entrances and raised pedestrian crossings etc.</p> <p>I make a plea for more tree planting in the ward wherever possible (I particularly love cherry blossom). As well as any kind of flowers/shrubs/or wildlife planting to improve the habitat for birds etc.</p> <p>I also appreciate all that the police do for us as residents, so would welcome any available funding being spent in that category.</p> <p>Thank you for all the work that you do on our behalf.</p>	<p>can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Sean Jelley Holland</p>	<p>Further to the request for proposals regarding our ward's NCIL, may I suggest the following:</p> <ol style="list-style-type: none"> <li>1. Raised road crossings (per recent works at the intersection of Ladbroke Grove and Ladbroke Square) at ALL key pedestrian crossing points on Holland Park/Abbotsbury opposite park gates (specifically Holland Park "south" and Abbotsbury Road multiple entrances), and at ALL the ward's roads' intersections with Holland Park Avenue / Kensington High Street / Holland Road.</li> <li>2. Traffic calming measures on Holland Park and Abbotsbury roads (flashing speed indicators, road narrowing measures, bumps, etc.)</li> <li>3. Tree planting along pavement on Holland Park, between the new Dukes Lodge Development and the entrance to the park on Holland Park "south".</li> <li>4. Contribution (with other adjacent wards) towards the acquisition of a local council flat</li> </ol>	<p>Thank you, these examples fall within the suggested priorities Transport and Highways, Streetscape and Affordable Housing.</p> <p>The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>

Name	Comment	Response
	to be reserved for rental, solely for a locally employed police officer (Earls Court, or Parks Police), at subsidised rentals.	
Natalie Cutler Holland	<p>As a member of Holland Park Residents' Association and a resident of the area since 2008, I am concerned at the increase in reckless driving on our streets. It is becoming dangerous.</p> <p>It appears we require some traffic calming measures urgently. You have kindly erected signs designating the speed limit but there is no way of enforcing it. The introduction of the latest in sleeping policemen which do not damage cars, a flashing sign as there is near Chepstow Villas, showing the driver when they exceed the limit, and a zebra crossing by the Greek Embassy entrance to Holland Park could all assist. Trying to cross the road to the park in that spot, often pushing a pram, is dangerous in the extreme.</p> <p>I also trust the nonsensical and hugely expensive plan for an unwanted and unnecessary cycle lane along Holland Park Avenue will be consigned to the bin. At this truly desperate time, we need funds for far more important matters.</p>	<p>Thank you, these examples fall within the suggested priorities Community Safety, Transport and Highways and Streetscape.</p> <p>The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
Antoine Abdini Holland	<p>Let me first start by saying that I have recently moved into Holland Park and I am absolutely shocked about the traffic on the road. My first reaction was this road is not the residential road it was 10 years ago, it has become a sort of rat run highway.</p> <p>How is it possible that the council has allowed the traffic situation to deteriorate so drastically? Why on earth a residential road is allowed to replace the functionality of HP Avenue? Busses, heavy trucks, vans, and motorcycles speed through simply to skip HP Avenue. If anyone disputes the</p>	<p>Thank you, this falls within the suggested priority Transport and Highways.</p> <p>The Council encourages such projects to be put forward for consideration as part of the Call for NCIL Projects.</p> <p>A Call for NCIL Projects will be undertaken later this year when you</p>

Name	Comment	Response
	<p>fact that a residential road has become a cut-through, a rat run, I would like to hear their point of view.</p> <p>We have vulnerable communities and there are serious safety issues as well as noise and pollution. <b>I think the highest priority is for <u>calming measures on the roads most affected.</u></b></p> <p>In order of priority, here are my suggestions in order of preference:</p> <ol style="list-style-type: none"> <li>1. Sinusoidal speed humps (Sinusoidal humps are great, no noise while slowing the traffic enough to make a difference)</li> <li>2. Discreet road-narrowing on multiples places plus bollards to slow traffic and disallow oversized vehicles.</li> <li>3. Installation of raised pedestrian or cross-over at the entrance of the park as to allow civilised access to the park as well as slowing down traffic.</li> </ol> <p>The southern arm of HP has been thrown under the (proverbial) bus. While residents might be happy to rely on the funds available, this is a serious community issues which cannot be left to fester and ruin the quality of life of the residents. Unlike Abbotsbury Road, the southern arm of HP was not meant to be a north-south (or reverse) traffic artery. <u>Sinusoidal humps should be a forgone conclusion: if Abbotsbury has them, only a flawed logic would deny the southern arm of HP a comparable treatment.</u></p>	<p>can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>
<p>Mariana Rusu Holland</p>	<p>Without a doubt in my mind, the <u>traffic situation</u> in Holland Park and particularly the southern arm of Holland Park is the most urgent. It seems that while many of the neighbouring ares are safe for pedestrians and shielded form commuter traffic, the southern arm of Holland Park was left to deteriorate and now it has become unbearable.</p> <p>In my view:</p>	<p>Thank you, this falls within the suggested priority Transport and Highways.</p> <p>The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.</p>

Name	Comment	Response
	<p>First: Sinusoidal speed humps</p> <p>Second: Pinching the road as to force traffic to slow down + pedestrian crossing at entrance of park + bollards to restrict oversized vehicles</p>	<p>A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward, the Council will notify all respondents when this is due to take place.</p>

**Question 4: Do you have any comments on section 1: Introduction?**

Name (ward)	Comment	Response
<p>Fetter Lane Moravian Church (Claire Maxwell)</p> <p>Chelsea Riverside</p>	<p>I think it is so good that there is hope that the money will be used to make value of our green spaces. We are looking to find ways of opening up our green, heritage space more with our community and have hopes that this funding, should it become available, will allow for this to occur.</p>	<p>Thank you for your comment, it is noted.</p>
<p>Friends of Holland Park (J Kettlewell)</p> <p>Holland</p>	<p>Clear</p>	<p>Noted.</p>
<p>Environment Agency (Andy Goymer)</p>	<p>We have no comments to make on either document.</p>	<p>Noted.</p>
<p>Highways England (Kayley Smith)</p>	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network</p>	<p>Your comments have been provided to our Transport and Highways Team.</p>

Name (ward)	Comment	Response
	<p>(SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>Neighbourhood Community Infrastructure Levy (CIL)- Community Priorities</p> <p>Our interest in such strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the SRN for which we are responsible.</p> <p>It should be noted that, in accordance with DCLG guidance, any development contributions towards SRN improvements would be secured via S278 agreements, and not via a CIL Reg123 List or S106. The use of S278s will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement. However, in some cases it could be more expedient for Highways England to be party to the S106 and secure mitigation through obligations.</p>	<p>This consultation is about establishing community priorities to help make best use NCIL funds, the process for communities to access NCIL funding and the allocation of funds towards projects put forward by local communities. The consultation does not relate to securing planning contributions.</p>
<p>Ladbroke Association (Sophia Lambert)</p> <p>Wards: Colville, Norland, Notting Dale and Pembridge</p>	<p>We welcome this consultation. However, we are extremely disappointed that the Council did not consult on how the funds should be allocated between areas. There is no need for them to be allocated on a ward basis – we understand that Brent, for instance, has divided its area into four districts; and that Lambeth groups several wards grouped together into a larger area which then has a Cooperative Local Investment Plan prepared as a multi-year programme of projects using NCIL.</p> <p>Allocating the funds on a ward basis creates disparities that must shock most people. We appreciate that the Council has tried to mitigate the disparities by a limited amount of top-slicing. But this still leaves for instance Holland with £668,000 and Colville (where</p>	<p>Distributing the funds based on wards best reflects where CIL liable development has taken place, it also provides an opportunity to align the process with the Council's existing ward funding model, City Living Local Life. The Council's approach to top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of</p>

Name (ward)	Comment	Response
	<p>there are far more likely to be good projects within the listed priorities) with £41,000, which is bound to appear to most grossly unfair. Once there has been some experience of the scheme, we would urge the Council to consult on other possible methods of allocation.</p> <p>In the meantime, is there any scope for NCIL-rich wards to pass any funds they cannot spend onto NCIL-poor wards on a voluntary basis?</p>	<p>NCIL funds to those wards where there is currently none or a small amount available. Combining wards such as Holland and Colville may not work as they do not adjoin. Adjacent wards could be combined but there would still be parts of the borough with disparate funds. We expect ward residents and ward members to work with each other and together. We will facilitate this where we can.</p> <p>The Council will also aim to use the remaining Borough CIL to narrow the gap across the borough.</p> <p>The approach does not preclude wards coming together for joint funding. The Council would encourage this and following text will be added to the final document to reflect this.</p> <p>New paragraph:</p> <p><b><u><a href="#">4.9 Communities and/ or organisations may also work together on projects and apply for joint funding. Joint applications may also be made by communities and/ or organisations in different wards</a></u></b></p>

Name (ward)	Comment	Response
		<p data-bbox="1599 252 2058 352"><u>from each other. The Council will facilitate this as much as possible.</u></p> <p data-bbox="1599 389 2058 552">The Council will keep the approach to distribution under review and modify it as necessary in the future. The following text will be added to the final document to reflect this.</p> <p data-bbox="1599 592 2058 719">2.2 ...plan area. <u>The approach to distribution will be kept under review and revised if required in the future.</u></p>
Marianne Harris Pembridge	It is unfair that more money is allocated to wards that have a neighbourhood plan. Why?	<p data-bbox="1599 874 2029 906">This is set by national legislation.</p> <p data-bbox="1599 938 2058 1273">The Community Infrastructure Levy Regulations 2010 (as amended), [Regulation 59A and 59F] require that 15% of CIL collected in the borough is apportioned as Neighbourhood CIL (NCIL) in those areas where CIL liable development has taken place. Where there is a neighbourhood plan, this increases to 25%.</p> <p data-bbox="1599 1305 2058 1362">This is also reflected in the National Planning Practice Guidance on</p>

Name (ward)	Comment	Response
		<p>Community Infrastructure Levy, paragraphs 145 and 146.</p> <p>The approach set out in the consultation document is in line with the above.</p>
<p>St Quintin And Woodlands Neighbourhood Forum and St Helens Residents Association (Henry Peterson)</p> <p>St Helen's</p>	<p>Section 1 includes this paragraph 1.2 A proportion of CIL is apportioned as Neighbourhood CIL (NCIL)<sup>3</sup>. This is a percentage (15%) of CIL received from development in an area and is to be spent on local priorities identified by local communities and agreed by Ward Members. Where a neighbourhood plan exists, the proportion is higher (25%) and is to be spent on infrastructure identified in the relevant neighbourhood plan.</p> <p>This is an interpretation of the content of National Planning Practice Guidance, which reads If there is no parish or town council, the charging authority will retain the levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding.</p> <p>The intention is therefore one of 'agreement' with the local community rather than 'agreement' by Ward Members. This should involve both consultation and negotiation, should the views and priorities of local residents diverge from those of Ward Members. We accept that the local authority retains the legal right to make final decisions on NCIL allocations but this should be after genuine and serious efforts have been made to reach agreement within the area concerned.</p> <p>The wording is to be spent on infrastructure identified in the relevant neighbourhood plan is also more directive than what is stated in the NPPG. The actual wording is: Where a neighbourhood plan has been made, the charging authority and communities should consider how the neighbourhood portion can be used to deliver the infrastructure identified in the neighbourhood plan as required to address the demands</p>	<p>The local community or local community groups/ organisations are best placed to understand needs of their wards/ area. They play a pivotal role in establishing the priorities for their ward through this consultation and identifying projects that they wish to put forward for NCIL funding through the Call for NCIL Projects. Therefore projects will be put forward by the community itself. Ward members will be aware of the changing needs and priorities for their area through communication with constituents and will draw on this when considering all projects put forward. Clearly if a project has a lot of community support ward members/any decision maker will have to be guided by this. We therefore expect ward residents and ward members to work with each other and together. We will facilitate this where we can.</p>

Name (ward)	Comment	Response
	<p>of development. They should also have regard to the infrastructure needs of the wider area.</p> <p>'Considering how' does not mean that all of the the 25% element must be spent on infrastructure identified in the Neighbourhood Plan or infrastructure generally. It is assumed that RBKC does not intend to set such a restriction? As the consultation document acknowledges at 2.7 and 2.8 the wording of the Regulation is much wider (see below).</p> <p>We assume that following this consultation the Council will publish a document on NCIL that sets out the arrangements for allocation and governance, and which is available from the RBKC website as a long-term publication? Some of the comments below refer to information which it would be useful to include on such a document.</p>	<p>In areas with a neighbourhood plan, the items identified in the respective neighbourhood plan will guide the use of NCIL funds. This does not prevent NCIL funds being sought for other items/ projects that would address the demands that development places on the area. Whilst the Council would encourage that items in the neighbourhood plan are prioritised by Neighbourhood Forums all projects put forward will be considered by ward members. The following text will be added to the final document to reflect this.</p> <p>1.2 ...and <u>is to should</u> be spent on infrastructure identified in the relevant neighbourhood plan.</p> <p>4.1<sup>23</sup> There are two neighbourhood plans in the borough. The St Quintin and Woodlands Neighbourhood Plan and the Norland Neighbourhood Plan. Both of these identify infrastructure priorities for the respective neighbourhood areas as follows. These established priorities will <u>form part of the shortlisting criteria within guide spending in</u> Neighbourhood Plan areas. <u>NCIL</u></p>

Name (ward)	Comment	Response
		<p><a href="#"><u>funds in these areas could also be used for other items/projects that address the demands that development places on the area. This may also include preparing neighbourhood plans.</u></a></p> <p>The Council will publish a governance document and guidance to assist local communities to draw on the NCIL funds.</p>
<p>Kensington Society (Amanda Frame)</p> <p>All wards except Chelsea Riverside, Royal Hospital and Stanley</p>	<p>We support the more detailed comments which have been sent in from those of our affiliated organisations which our chaired by trustees of the society and who also chair residents associations/amenity bodies in local areas (VRARA, Ladbroke Association, St Helens/StQW Forum).</p> <p>We recognise that the Council is facing huge challenges from the current pandemic, and that this is not the moment to ask for a more fundamental rethink of how RBKC allocates Neighbourhood CIL. But it must be recognised that the Council has chosen to fix on a particular approach to NCIL (ward-based allocations) along with a specific methodology for ‘top-slicing’ and reallocating between wards, with no consultation or input from local people.</p> <p>As identified in other consultation responses, there are alternative options in use elsewhere in London (and no doubt across England). We do not feel that a ward based model, with its resultant extreme variances in the resources available, will prove sustainable over time.</p> <p>We would welcome RBKC establishing a definitive legal position on the scope for NCIL receipts to be ‘pooled’ or redistributed within a local authority area (as LB Haringey has consulted on).</p>	<p>Distributing the funds based on wards best reflects where CIL liable development has taken place, it also provides an opportunity to align the process with the Council’s existing ward funding model, City Living Local Life. The Council’s approach to top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of NCIL funds to those wards where there is currently none or a small amount available. The approach does not preclude wards coming together for joint funding. The Council would encourage this and following text will be added to the final document to reflect this.</p>

Name (ward)	Comment	Response
	<p>We also think that any final RBKC 'governance' document for NCIL should be clearer on how decisions on projects and initiatives are finalised. Wording in the consultation document implies that ward councillors will have the final say.</p> <p>There is an argument (as put forward in the St Helens/StQW response) that National Planning Practice Guidance assumes that NCIL spend will be 'agreed with' local people, rather than being 'agreed by' the local authority. This reflects the position in all parished areas, where NCIL resources remain under the direct control of parish and town councils at a very localised level.</p>	<p>New paragraph:</p> <p><b><u>4.9 Communities and/ or organisations may also work together on projects and apply for joint funding. Joint applications may also be made by communities and/ or organisations in different wards from each other. The Council will facilitate this as much as possible.</u></b></p> <p>The Council will keep the approach to distribution under review and modify it as necessary in the future. The following text will be added to the final document to reflect this.</p> <p>2.2 ...plan area. <b><u>The approach to distribution will be kept under review and revised if required in the future.</u></b></p> <p>Please also see response to St Quintin and Woodlands comment above.</p>
<p>Victoria Road Area Residents' Association (Michael Bach)</p> <p>Queen's Gate</p>	<p>Queen's Gate ward has been allocated a one-off sum of £46,001. Some of the items given as examples or proposed by respondents, such as streetscape proposals, are likely to be larger than or take most of the allocation for the ward or would be more appropriately covered by or prioritised within existing programmes (eg Streetscape Review, CCTV installations)</p>	<p>The amount of NCIL available in each ward will continually vary depending on the amount of Borough CIL collected. The amount of NCIL available to the ward will</p>

Name (ward)	Comment	Response
		<p>be publicised in advance of the Call for NCIL Projects.</p> <p>In reviewing the NCIL funding applications the Council will look to draw on experience and intelligence from other council departments or organisations, see paragraph 4.11 of the consultation document. This will help establish where there may be synergies or existing programmes seeking to deliver the same outcomes as the project put forward. The following text will be added to the final document to reflect this.</p> <p>4.1<del>1</del><sup>2</sup> ...The Council may contact the applicant if further information is required during the review period and look to draw on experience and intelligence <u>from</u> other departments or organisations. <u>This will help establish where there may be synergies or existing programmes seeking to deliver the same outcomes as the project put forward. Projects will be subject to wider considerations where proposals impact on a wider area. Following review, all projects will</u></p>

Name (ward)	Comment	Response
		<a href="#">be considered by Ward Members.</a> The Council also encourages match funding to be sought.
Bedford Gardens Neighbours (Gillian Day) Campden	As part of Campden Ward, the priorities of Bedford Gardens Neighbours are traffic calming, the environment and safety.	Thank you, these are noted and will inform the community priorities.

**Question 5: Do you have any comments on Section 2: How much money is available?**

Name	Comment	Response
Fetter Lane Moravian Church (Claire Maxwell) Chelsea Riverside	I notice that for Chelsea Riverside a significant amount of funding is available so hope that multiple projects will be funded to engage with the diversity of our community in this ward.	Your comment is noted.
Friends of Holland Park (J Kettlewell) Holland	Clear	Your comment is noted.

Name	Comment	Response
<p>Ladbroke Association (Sophia Lambert)</p> <p>Wards: Colville, Norland, Notting Dale and Pembridge</p>	<p>See answer to question 4.</p>	<p>Please see response to Ladbroke Association comment at Question 4.</p>
<p>Marianne Harris</p> <p>Pembridge</p>	<p>It appears that more money is allocated to the wealthier wards (is this because they have more building projects?) even after the adjustment &amp; that looks very unfair. Especially with the bad reputation RBKC has nationally of being an very inequitable area</p>	<p>Yes, it is correct that wards with more development have more NCIL funds collected. However, this is the nature and intention of the Government's CIL Regulations to collect the levy for where development took place. The Council's approach to top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of NCIL funds to those wards where there is currently none or a small amount available. At the same time it reflects where CIL liable development has taken place and the demands that development places on those areas. The Council will also aim to use the remaining Borough CIL to narrow the gap across the borough.</p>
<p>Andrew Jamieson</p> <p>Colville</p>	<p>As a result of the large volume of tourists, the streets around Portobello Road are often heavily littered so more attention to cleaning (including water jet and steam cleaning) is necessary. Also for streetcare and policing.</p>	<p>Thank you, these fall within the consultation priorities Streetscape, Waste, and Policing and</p>

Name	Comment	Response
		Emergency Services. They will inform the community priorities.
<p>St Quintin And Woodlands Neighbourhood Forum and St Helens Residents Association (Henry Peterson)</p> <p>Dalgarno, St Helen's</p>	<p>RBKC is behind many London Boroughs is consulting on arrangements for allocation of Neighbourhood CIL (see the London-wide survey carried out in 2016 at <a href="https://140d5992-3079-4eb8-bf8d-7a7c1aa9d1df.filesusr.com/ugd/95f6a3_684e0bae1dec48c9a7edd92f485a0bee.pdf">https://140d5992-3079-4eb8-bf8d-7a7c1aa9d1df.filesusr.com/ugd/95f6a3_684e0bae1dec48c9a7edd92f485a0bee.pdf</a>)</p> <p>Given this long wait for consultation it is disappointing that the Council has not opened up the options and sought views on the merits of alternative approaches. Several London Boroughs (e.g. Brent, Lambeth, Haringey, Hackney) use alternatives to wards. Several if these Boroughs use clusters of wards. Richmond uses the areas of its 'village plans'. RBKC could use the 'Places' in its Local Plan (supplemented to cover the Borough) which will often define 'natural neighbourhoods' rather better than ward boundaries fixed for electoral administration purposes.</p> <p>We accept that ward boundaries have the benefit of defining an additional role and responsibility for ward councillors in consulting on and agreeing NCIL priorities and projects. We welcome the principle that ward councillors should be actively involved in consulting with and listening to views of local people. Such a level of involvement has not always been the norm in all parts of RBKC, albeit that a growing number of ward councillors elected in 2018 have devoted more time to ward matters.</p> <p>There may be an option which would combine the best of both worlds, using (say) 5-6 clusters across the Borough of wards that work together on NCIL allocation. This would help to avoid the risks of wards in which no councillors take a sufficiently active interest in the identification of priorities and allocation of funds, while also reducing the huge disparities of NCIL funds defined as being available for each ward.</p> <p>We accept that at present the Council is faced with many challenges and a rethinking of arrangements for NCIL will come low on the list at the present time. But we think that</p>	<p>Distributing the funds based on wards best reflects where CIL liable development has taken place, it also provides an opportunity to align the process with the Council's existing ward funding model, City Living Local Life. The Council's approach to 'top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of NCIL funds to those wards where there is currently none or a small amount available. The Council will also aim to use the remaining Borough CIL to narrow the gap across the borough.</p> <p>We are happy for 'Places' to be used if Ward Members are happy to do so. We expect ward residents and Ward Members to work with each other and together. We will facilitate this where we can.</p> <p>The approach does not preclude wards coming together for joint funding. The Council would encourage this and following text</p>

Name	Comment	Response
	<p>there will be a need for review of the model set out in the consultation paper after a couple of years, not least in terms of distribution of NCIL across the Borough (see below).</p> <p>The Council's proposals for 'top-slicing' go a small way towards redistributing available NCIL resources. But very large differences remain between e.g. the £668K available to Holland ward and the £44k available to Colville ward. In part these variances will have resulted from differential CIL charging rates in the zones that RBKC decided on in 2015 and not solely the consequence of different volumes of 'development' in each ward. This weakens any argument that e.g. Holland ward 'deserves' a far greater NCIL allocation because its residents have suffered a higher level of nuisance and harm from development activity over the past 5 years.</p> <p>Section 2 explains that £2.66m of NCIL has accumulated by January 2020. It mentions that this has been over a five year period since RBKC introduced its CIL regime in April 2015. It would be helpful for the public to know the annual figures on CIL collection since 2015 (which are available from Annual Monitoring Reports which few residents read). It would also be helpful to have an explanation that there will be further NCIL resources collected in future years, and a rough estimate of what these might be. Other London Boroughs treat NCIL as a resource to be planned and allocated over several years (e.g. Lambeth's Co-operative Local Investment Plans (CLIPs)). For those parts of the Borough with substantial NCIL funds it would seem sensible for funds to be planned and allocated beyond a single financial year and to be allowed to be carried forward at year end.</p> <p>It is assumed that the ward allocations in the consultation paper are based on actual receipts since 2015. Our understanding is that there is no impediment in legislation or regulations to the Council redistributing NCIL resources across the Borough in a much more radical way than that proposed.</p> <p>LB Haringey consulted in 2020 its original NCIL governance arrangements and moving to a model of pooling the neighbourhood proportion of CIL receipts raised from across</p>	<p>will be added to the final document to reflect this.</p> <p>New paragraph:</p> <p><a href="#"><u>4.9 Communities and/ or organisations may also work together on projects and apply for joint funding. Joint applications may also be made by communities and/ or organisations in different wards from each other. The Council will facilitate this as much as possible.</u></a></p> <p>The Council will keep the approach to distribution under review and modify it as necessary in the future. The following text will be added to the final document to reflect this.</p> <p>2.2 ...plan area. <a href="#"><u>The approach to distribution will be kept under review and revised if required in the future.</u></a></p> <p>The amount of NCIL available to the ward will be publicised in advance of the Call for NCIL Projects. This explanation will be included. In the future the Council will be preparing Infrastructure</p>

Name	Comment	Response
	<p>the borough (except for Neighbourhood Forum areas) and then allocating NCIL to projects prioritised on a borough-wide basis. A copy of Haringey’s consultation paper is being emailed separately from this response.</p> <p>The last sentence in paragraph 2.8 is a quote from the NPPG and reads “For example, the pot could be used to fund affordable housing.”. We are puzzled by this as paragraph 144 Reference ID: 25-144-20190901 of NPPG ends by stating “Charging authorities may not use the levy to fund affordable housing. For most RBKC wards the NCIL allocation would not begin to stretch to any meaningful contribution for affordable housing.</p> <p>The equivalent paragraph in the earlier 2012 NPPG reads “Areas could use some of the neighbourhood pot to develop a neighbourhood plan where it would support development by addressing the demands that development places on the area. We hope that RBKC will adhere to this principle. The StQW Neighbourhood Forum is considering the need to review and update its neighbourhood plan (drafted in 2015). Part of the £30,000 allocation to the StQW neighbourhood area may be prioritised for basic costs involved in this exercise (consultation material, room hire etc). LB Camden has allowed neighbourhood forums to use NCIL to prepare conservation area management plans.</p> <p>We are optimistic that ward councillors in Dalgarno and St Helens ward will find that they are in agreement with the priorities originally identified in the neighbourhood plan (see paragraph 4.12 of the consultation paper), along with those floated at an open meeting of the Forum on March 12th (which Cllr Mo Bakhtiar and Cllr Pat Healy attended). One of the Government’s original objectives in setting up the NCIL regime was to encourage the expansion of neighbourhood planning. While this has happened outside London, there remain only 16 ‘made’ neighbourhood plans in the capital.</p> <p>Our Forum members feel that having prepared a neighbourhood plan, our local residents should be able to choose how the £30,000 allocation to the forum area is spent without having decisions overruled by the Council.</p>	<p>Funding Statements as required by the CIL regulations. These include more detailed reporting requirements. When permission is granted we issue CIL Liability Notices but the amounts are only received when a development commences. The amounts raised in CIL Liability Notices will be reported.</p> <p>Paragraph 144 of the NPPG on CIL relates to the borough proportion of the Community Infrastructure Levy whilst paragraph 151 relates to neighbourhood CIL and is titled “<i>What can neighbourhood funding be spent on?</i>” This includes the reference to affordable housing and has been quoted at paragraph 2.8 of the consultation document.</p> <p>The consultation document clarifies that it is “expected” that projects will be delivered within 12 months. Projects may take longer to deliver, and this can be outlined on the project funding form by applicants.</p> <p>Please also see response to St Quintin And Woodlands Neighbourhood Forum and St</p>

Name	Comment	Response
		Helens Residents Association comment at Question 3 above.
<p>Kensington Society (Amanda Frame)</p> <p>All wards except Chelsea Riverside, Royal Hospital and Stanley</p>	<p>Many responses to this consultation will have drawn attention to the extreme variations in NCIL resources allocated to each ward, even with the ‘top slicing’ arrangements that the Council proposes. We do not know whether councillors and the Leadership Team considered other options, including higher levels of top-slicing?</p> <p>One of the cross-cutting themes in the Council Plan is that of ‘Narrowing the Gap’ with the following commitment We will improve outcomes for our residents, with a focus on narrowing the gap between different communities, and seek to ensure that individuals have equal opportunity to fulfil their potential.</p> <p>The very unequal levels of CIL collected across different parts of the Borough (and hence the similarly unequal 15% proportions of NCIL) result in part from the differential charging bands in defined sub areas in the Borough. For residential development these bands range from £750 in Zone A to £110 in Zone F (and nil in Zone G (Earls Court) and Zone H (Earls Court).</p> <p>These charging levels (unsurprisingly) result in very different levels of CIL receipts. But these charge bands have no relationship with actual needs in each ward, and have little real relationship with the ‘harm’ resulting from development (noise, nuisance, breaches of CTMPs).</p> <p>There will be some sites where specific new infrastructure needs result from a development, and where CIL spend may have a direct relationship in mitigating harm or bringing improvement. But in cases such as basement development in the most affluent and high value parts of the Borough, it is hard to see why high levels of CIL and NCIL receipts should lead to a public benefit only the ward where such development has taken place?</p>	<p>The amount of NCIL received in each ward will continually vary depending on the amount of Borough CIL collected. The CIL Viability Study (2014) informed the proposed CIL rates.</p> <p>Distributing the funds based on wards best reflects where CIL liable development has taken place, it also provides an opportunity to align the process with the Council’s existing ward funding model, City Living Local Life. The Council’s approach to top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of NCIL funds to those wards where there is currently none or a small amount available. The Council will also aim to use the remaining Borough CIL to narrow the gap across the borough.</p> <p>The approach does not preclude wards coming together for joint funding. The Council would</p>

Name	Comment	Response
		<p>encourage this and the following text will be added to the final document to reflect this.</p> <p>New paragraph:</p> <p><u><a href="#">4.9 Communities and/ or organisations may also work together on projects and apply for joint funding. Joint applications may also be made by communities and/ or organisations in different wards from each other. The Council will facilitate this as much as possible.</a></u></p> <p>The Council will keep the approach to distribution under review and modify it as necessary in the future. The following text will be added to the final document to reflect this.</p> <p>2.2 ...plan area. <u><a href="#">The approach to distribution will be kept under review and revised if required in the future.</a></u></p>
Victoria Road Area Residents' Association (Michael Bach)	<p>The ward-level allocations in many cases are modest – one-off payments (46,000) only marginally larger than the increased CLLL annual budgets of £40,000 pa.</p> <p>Most people would have no idea what their proposals would cost. The examples may result in projects exceeding the NCIL funds but could be</p>	<p>The amount of NCIL received in each ward will continually vary depending on the amount of Borough CIL collected. The amount of NCIL available to the ward will</p>

Name	Comment	Response
Queen's Gate	<p>viable and/or prioritised as a result of NCIL providing seed funding a project.</p> <p>Other sources of funding, such as Transport and Highways projects, could provide the main funding and NCIL could top up the budget and/or influence the priorities. It should be possible to “package” funding from different “programmes” and, perhaps, be topped up by local residents’ associations.</p>	<p>be publicised in advance of the Call for NCIL Projects.</p> <p>The Council encourages obtaining match funding. Your suggestion of topping up and packaging will be drawn out further in governance guidance. The following text will be added to the final document:</p> <p>2.4 ...generate crowdfunding. <a href="#"><u>NCIL funding could be packaged up with funding from different programmes or be used by communities to top up existing Council programmes.</u></a></p>
<p>Bedford Gardens Neighbours (Gillian Day)</p> <p>Campden</p>	<p>The amounts per ward vary greatly and it is not clear why that should be. For example Holland Ward has much more budget than other wards including Campden. Local development, whilst it may reside in one ward, has a knock on effect across many and therefore the money should be more evenly divided. We are not aware that Holland Ward has disproportionately more development either.</p>	<p>Yes, it is correct that wards with more development have more NCIL funds collected. However, this is the nature and intention of the Government’s CIL Regulations to collect the levy for where development took place. The Council’s approach to top slice one quarter of the NCIL funds in each ward aims to provide a meaningful amount of NCIL funds to those wards where there is currently none or a small amount available. At the same time it reflects where CIL liable development has taken place and the demands that development places on those areas. The Council</p>

Name	Comment	Response
		<p>will also aim to use the remaining Borough CIL to narrow the gap across the borough.</p> <p>The Dukes Lodge scheme has contributed a large amount to Neighbourhood CIL for Holland ward.</p>
<p>Simeon Nnyombi Golborne</p>	<p>£46,968-It is considered that the priorities identified will take a very small fraction of this budget but go a long way in improving the lives of families living in this development.</p>	<p>Your comment is noted.</p>

**Question 6: Do you have any other comments on Section 3: Community Priorities?**

Name	Comment	Response
<p>Canal and Rivers Trust (Claire McLean) Ward: Dalgarno</p>	<p>The Canal &amp; River Trust is the charity who look after and bring to life 2000 miles of canals &amp; rivers, including the Grand Union Canal that flows through the North of the Borough. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.</p> <p>We note that the Trust's aims for the Grand Union Canal in Kensington and Chelsea would accord with some of the community priorities that were identified by the</p>	<p>Your comments are noted.</p>

Name	Comment	Response
	<p>community in Fig.3, including supporting health and wellbeing, and access to public open spaces.</p> <p>The Trust is also particularly concerned that when the Kensington Canalside development comes forward, a proportion of CIL or S106 from this should be focussed towards improvements to the Grand Union Canal, and accesses to and from it. Planting (possibly in the form of floating reedbeds) and mooring facilities may also be appropriate to support sustainable use of this community asset.</p>	
<p>Fetter Lane Moravian Church (Claire Maxwell)</p> <p>Chelsea Riverside</p>	<p>For me our top two priorities are conservation of our green space linking this to encouraging our community to know, own and be proud of its heritage.</p>	<p>Thank you, this falls within the consultation priority Parks and Open Spaces and has been used to inform the community priorities.</p>
<p>Friends of Holland Park (J Kettlewell)</p> <p>Holland</p>	<p>So many documents and confusion for me between priorities and info re specific requests</p>	<p>Your comment is noted, we produced a short summary document to make the consultation clearer to everyone. We will aim to make documents clearer.</p>
<p>Ladbroke Association (Sophia Lambert)</p> <p>Wards: Colville, Norland, Notting Dale and Pembroke</p>	<p>We think that the list of community priorities drawn up by the Council covers the ground well.</p> <p>In addition to Question 2. Of the Ladbroke Association's four wards, two are "rich" in CIL resources and two "poor". One of the "poor" ones contains both some of the richest areas and some of the most deprived. There must be quite a few other wards in a similar position, where the needs are likely to vary widely. Moreover, needs change (often as a result of new developments or unforeseen consequences of developments) and may come up at short notice. For the above reasons, we are unhappy that people are being urged to select priorities as one never knows what may come up. There should be maximum</p>	<p>Your support is noted.</p> <p>The purpose of the consultation is to establish community priorities which will guide NCIL spending. Ward members will be aware of the changing needs and priorities for their area through communication with constituents and will consider</p>

Name	Comment	Response
	latitude to use these funds to good effect and not to be restricted to a limited number of priorities. As this is a councillor-run scheme, it should in any case be for councillors to discuss priorities with their constituents.	all projects put forward. Therefore whilst the top priorities will guide NCIL spending, they will not preclude spending on other priorities. The priorities will be kept under review and revised to take account of changing priorities.
Marianne Harris Pembridge	I don't see that there is any worry that RBKC is a "place of culture." etc We do see that the borough is getting dirtier & appears less safe. Notting Hill Gate tube exit is a tip in the evening nowadays so it isn't "healthy, clean or safe". It's a good thing the tourists have mostly gone at nightfall.	Your comment is noted.
Cllr Hamish Adourian  Earl's Court	3.7 Typographical suggestions  3.8 Mention how much money will be available in 'Local Life'? Can we have a better name?!	Paragraph 3.8 has been amended to:  The council is also launching Local Life, a <a href="#">ward-based</a> community programme that <a href="#">offers enables</a> local people in the borough to:  The amount of ward funding available through Local Life will be included at paragraph 3.8.  <a href="#">£21,000 (for wards with two Ward Members) and £30,000 (for wards with three Ward Members)</a> <a href="#">Funding</a> is also available to each ward through Local Life...  Your comments regarding the name of Local Life will be fed back

Name	Comment	Response
		to the Community Engagement team.
<p>St Quintin And Woodlands Neighbourhood Forum and St Helens Residents Association (Henry Peterson)</p> <p>Dalgarno, St Helen's</p>	<p>The priorities identified for the Council Plan are broad enough to be likely to cover most of the specific projects and proposals that come forward for NCIL funding, and reference to these wider goals is helpful to an extent. But they are so wide in scope that they will not prompt many ideas for specific proposals.</p> <p>Paragraph 3.2 of the consultation document is hard for the public to understand and does not add much in terms of identification of specific spending proposals. The table in 3.3 with its examples is much more helpful.</p> <p>Paragraph 3.5 again uses the language of priorities being 'agreed by' Ward Members rather than 'agreed with'. We believe the NPPG requirements on NCIL to imply the latter and that Ward Members should be encouraged to recognise the need to seek agreement via negotiation amongst resident groups in their ward, including their own input as elected councillors. This is different from unilateral and top down 'selection' by Ward Members on the choice of projects and initiatives (see also below).</p>	<p>Through this consultation, the top priorities for each ward will be established. This will help prompt communities in developing specific proposals for their area.</p> <p>Your comment is noted, we produced a short summary document to make the consultation clearer to everyone. We will aim to make future documents clearer.</p> <p>See response to St Quintin And Woodlands Neighbourhood Forum comment at question 4.</p>
<p>Ten Acres Residents Association (Maeve Bromwich)</p> <p>Stanley</p>	<p>Having sought members views there was a preference for a choir, the idea that such an event is good for an individual's wellbeing and is something that is absolutely open to everyone. There was also a desire to have additional policing, this is an issue of particular concern to our members. In addition it was hoped that some of the funds could be used to improve rubbish collection/control and for further provision or dog poo bins of which there is a woeful shortage. In addition it was also hoped</p>	<p>Thank you, this falls within the consultation priorities Policing and Emergency Services, Waste and Cultural Facilities and have been used to inform the community priorities.</p>
<p>Transport for London (Sarah Wilks)</p>	<p>We are aware that the consultation is targeted at local residents and businesses and we fully support your approach in giving local people an opportunity to inform the</p>	<p>Transport and Highways is a suggested priority that communities</p>

Name	Comment	Response
All Wards	<p>priorities for how neighbourhood CIL funds are applied. Our comments below aim to highlight some of the possible opportunities where TfL and local priorities may align.</p> <p>Public and active transport infrastructure is vital in supporting 'good growth' across London and CIL (both strategic and neighbourhood) plays an important role in funding infrastructure to support new development. At a local level, even small interventions and improvements to public transport, walking, cycling and wayfinding can have a positive impact on people's experience of a place and encourage more people to choose more sustainable modes of transport - improving health, wellbeing and air quality. As such, we would particularly encourage you to include 'transport' as a priority for each ward within the borough. We would also encourage you to include a broader range of transport infrastructure in the list of potential projects, such as public transport, step free access, walking, cycling and wayfinding to encourage local people to think about transport and the potential benefits of transport improvements in the widest sense.</p> <p>It is also worth noting that once the priorities have been established for each ward, we may be able to lend technical expertise and support to work with the Council and local communities to enable relevant local projects to come forward. For example, TfL runs a 'People and Place Programme' through which we could work with, and support, the local community to brighten and improve the ambience at local stations. This could be done through photography or graphic design that reflects the local community. Enclosed is a document outlining some of the exciting work that has been delivered through the People and Place Programme.</p> <p>We do appreciate that local authorities are faced with numerous competing priorities for CIL funding across London, however, we would welcome the opportunity to work with you and the local community to improve public transport, cycling, walking and wayfinding infrastructure in the borough. By recognising the interrelationship between travel behaviours and the quality of place, we can work together with communities to improve London for all.</p>	<p>can select as a priority for their areas.</p> <p>Thank you for drawing our attention to the People and Place Programme and highlighting how it may align with local priorities. The Council will keep this and your offer of technical assistance in mind when reviewing NCIL Project Funding applications.</p>

Name	Comment	Response
<p>Kensington Society (Amanda Frame)</p> <p>All wards except Chelsea Riverside, Royal Hospital and Stanley</p>	<p>We think that many local residents and organisations will find it hard to think in terms of 'priorities' in the abstract rather than identifying specific projects and initiatives. The limitation of 'five priorities' seems arbitrary.</p> <p>We agree with the point made by VRARA that more information and guidance is needed on typical costs for the sorts of projects likely to come forward. The examples at paragraph 3.3. are helpful but give no indication of e.g. the costs per thousand of printing and distributing a leaflet across a ward, or installing an extra bike rack, CCTV camera, speed indicator sign, or zebra crossing. Given that many wards will have modest sums to allocate, this type of information will be need to be made available by RBKC at the stage when project bids are sought.</p>	<p>The local community or local community groups/ organisations are best placed to understand needs of their wards/ area. They play a pivotal role in establishing the priorities for their ward through this consultation and identifying projects that they wish to put forward for NCIL funding through the Call for NCIL Projects. Therefore projects will be put forward by the community itself. Ward members will be aware of the changing needs and priorities for their area through communication with constituents and will draw on this when considering all projects put forward. Clearly if a project has a lot of community support ward members/any decision maker will have to be guided by this. Therefore whilst the top priorities will guide NCIL spending, they will not preclude spending on other priorities. The priorities will be kept under review and revised to take account of changing priorities.</p> <p>Costs will undoubtedly vary between projects. Projects will be drawn up and put forward by the</p>

Name	Comment	Response
		communities, advice on how to approach this will be provided.
Victoria Road Area Residents' Association (Michael Bach)  Queen's Gate	Where major projects within a ward (eg Heythrop College in Queen's Gate Ward) would generate a large CIL contribution, part of this money should be hypothecated to be spent in the ward and prioritised for measures needed to mitigate problems caused by the development. This would be in line with the CIL Regulations: anything else that is concerned with addressing the demands that development places on an area.	Your comment is noted. The approach set out in the consultation document follows CIL regulations.
Bedford Gardens Neighbours (Gillian Day)  Campden	Many of the priorities listed above are interlinked and should be considered holistically.	Your comment is noted, NCIL projects may relate to more than one priority. This is reflected in the review criteria (figure 5 of the consultation document) and Part B of the project funding form.
Simeon Nnyombi  Golborne	The priorities identified are aligned with the following Council priorities: <ul style="list-style-type: none"> <li>• A great place to live, work and learn.</li> <li>• Healthy, clean and safe.</li> </ul>	Your comment is noted.
Holland park Residents Association (John Cowdry)  Holland	The HPRA is, as you well know, extremely concerned about the volume and speed of the traffic that uses the roads within our area. (To remind you, our geographic area encompasses all of the roads called "Holland Park", and Holland Park Mews.) Principally, the roads called Holland Park are of concern, because of their width and absence of traffic impediments. Holland Park Mews is by its cobbled and narrow nature less susceptible to speeding traffic, and is for the same reasons also not generally a desirable cut-through. However, we would ideally want all of 'our' roads to be treated equally (for example, with the imposition of a 20PH speed limit).	Thank you, these comments fall within the suggested priorities Transport and Highways, Health, . Streetscape and Air Quality.  The Council encourages projects to be put forward for consideration as part of the Call for NCIL Projects.  A Call for NCIL Projects will be undertaken later this year when you can put specific projects forward,

Name	Comment	Response
	<p>It is gratifying to note that there is a not inconsiderable sum available from the NCIL to be spent within our Ward. We are strongly of the view that use of some of those funds in our part of the Ward, in order to reclaim the proper and original nature of our roads as residential streets (rather than a commuter cut-throughs or major thoroughfares), would represent money well-spent on loyal constituents.</p> <p>We are of course aware of, and appreciate, the initiatives that you are taking with regard to</p> <ul style="list-style-type: none"> <li>• promoting the imposition, on a permanent basis, of a 20 MPH speed limit on all of the roads called Holland Park (and, as we have said, also Holland Park Mews), and</li> <li>• the installation of SIDs on the northern and southern parts of Holland Park.</li> </ul> <p>Whilst SIDs would also be useful on the western part of Holland Park (the extension of Abbotsbury Road), that part already enjoys the benefit speed humps which go a long way to inhibiting speedsters. (Notwithstanding those speed humps, however, do you think that SIDs might be a possibility on the western part of Holland Park as well?).</p> <p>All of that having been said, our <b>principal priority</b> for our Ward is by far in the category of "<b>Transport and highways</b>". We would warmly urge you, please, to make the case very strongly for the use of some of the funds for the purpose of installing the following traffic calming and pedestrian-protection measures:</p> <ol style="list-style-type: none"> <li>1. the installation of sinusoidal speed humps, sensibly and usefully placed on all parts of Holland Park (and on Holland Park Mews);</li> <li>2. the installation of discreet road-narrowing at the entrances to <b>all</b> of the roads called Holland Park, so that cars cannot simply speed onto our roads, but would have to slow down before entering them;</li> </ol>	<p>the Council will notify all respondents when this is due to take place.</p>

Name	Comment	Response
	<p>3. the installation of raised cross-overs at the entrances to all of the Holland Parks, for the reason set out in 2 above, and to provide safer crossings for pedestrians, and with the added benefit of slowing traffic flow;</p> <p>4. the installation of a raised pedestrian crossing, perhaps even with a user/pedestrian-operated traffic light, at the entrance to the Park itself (next to the Greek Embassy), to provide a safer crossing for pedestrians, and with the added benefit of slowing traffic flow;</p> <p>5. additional raised road-narrowing and crossing points, perhaps midway on the lengths of the north and south parts of Holland Park, would also be welcome and sensible measures.</p> <p>These measures would also be intended to reduce, and would - we anticipate - have the effect of reducing, the amount of traffic using our roads.</p> <p>As a matter of interest, some of members, who may have responded to the consultation separately, have also suggested:</p> <p>1. closing off the eastern entrance to Holland Park (where the Ukrainian Religious Society of Santa Sophia is, # 79 Holland Park), thereby effectively making the whole of area a <i>cul-de-sac</i>, an idea which we would certainly support; and</p> <p>2. putting up signs at the all the entrances to Holland Park, saying "Residents Only", something we would also support, although enforcement would (as ever) be problematic without physical measures also in place.</p> <p>Our <b>second priority</b> would be "<b>Air Quality</b>", because fewer vehicles would of course result in lower fume levels and therefore improved air quality for the residents on our roads. In tandem with fume pollution of course, there is also the matter of noise pollution, which is currently unbearable - and</p>	

Name	Comment	Response
	<p>deteriorating - given the amount and traffic on our roads and the speeds at which all too many cars travel. Our members complain that it is thoroughly unpleasant on almost any day of the week and at almost any time of the day to have one's road-facing windows open, because of the smell of the fumes and the noise of the traffic.</p> <p>(Anecdotally, in this time of the CoVid 19 lockdown, the dual nature of the traffic problem on our roads has been emphasised. On the one hand, there are of course significantly fewer cars on our roads now, which makes it possible once again to open one's road-side windows without fear of asphyxiation, and without having to shout in one's living room to make oneself heard. On the other hand, the number of cars speeding (percentage) seems to have increased dramatically: with fewer cars on the roads, speedsters take advantage of our wide and empty streets to accelerate dramatically (either up- or down-hill), many even overtaking slower vehicles. Thus, it is self-evident, that the problems of VOLUME of traffic and SPEED of traffic both need to be addressed. SIDs will undoubtedly be useful to 'control' law-abiding drivers, but wilful speedsters will certainly - in the absence of actual PHYSICAL IMPEDIMENTS - continue to use our wide roads as an opportunity to travel at way in excess of any speed limit.)</p> <p>Our <b>third priority</b> would, we believe, fall under the category "<b>Streetscape</b>". The archway into Holland Park Mews (west side of the Mews) is falling into a state of disrepair, and parts of it fall off the main structure from time to time. We understand that the arch is not in danger of collapse, but falling plasterwork could nevertheless cause harm to people and to property. We have corresponded about this in the past, most recently towards the end of September 2019, with the inclusion of Jonathan Wade in that exchange. You may recall that the arch is listed, but that there was some question as to its actual ownership (and hence where the</p>	

Name	Comment	Response
	<p>responsibility for its upkeep fell). Mr Wade has advised that the arch has been identified by planners in the RBKC as "an unowned heritage asset". Apart from needing to prevent harm to passers-by from debris falling off the arch, the preservation of this listed asset is important for our Ward, as the arch is a wonderful part of the architectural history and fabric of our neighbourhood. Part of "Streetscape", too, would be a request to plant more trees, perhaps in a long island in the centre of the eastern 'sweep' of Holland Park, just past the newly built Duke's Lodge. (Such an island accommodating a line of new trees would also have the benefit of rendering the road narrower at that point, and therefore reducing the opportunity to speed up (and down) that section of our street.)</p> <p>A further thought, which perhaps falls under all of the above three categories, is to install some more kerb-side power / charging points for electric / hybrid cars. The RBKC has already installed a few of those in our roads, but the adjacent parking bays have not been designated as exclusively for the use of vehicles requiring charging. This renders those charging points inaccessible to electric / hybrid cars much of the time, and does little to encourage car owners to switch to electric / hybrid, something that we believe the RBKC, and City, are keen to do.</p> <p>Thank you for taking these issues into consideration: we earnestly hope that a full suite of practically effective traffic calming measures will result from this consultation. Our residents, like all residents on residential roads, are entitled to be the enjoyment of their streets without having to bear the blights of speeding traffic passing through their area; of poor air quality; and of intolerable traffic noise; all of which greatly diminish the use, enjoyment and amenity of living in our area.</p>	

**Question 7: Do you have any comments on Section 4: NCIL Governance?**

Name	Comment	Response
<p>Ladbroke Association (Sophia Lambert)</p> <p>Wards: Colville, Norland, Notting Dale and Pembridge</p>	<p>Para 4.18: There may be projects that will take more than one year to complete or are delayed for unavoidable or good reasons. We are, therefore, concerned about the rule that projects need to be completed within 12 months. There should be scope for extending the period.</p> <p>It is not clear into what bank accounts the moneys would be paid. Many local organisations do not have bank accounts. We would recommend that ward councillors should have a dedicated ward bank account from which moneys could be disbursed as necessary (this could be used for Local Life moneys as well). There should in any case be guidance on this aspect.</p> <p>4.19. Accounting arrangements. The accounting arrangements for City Living have been notoriously lax. There are bound to be some projects which underspend or cannot be completed. There should be proper accounting and checking so that unspent moneys are returned promptly to the Council. Beneficiaries should be asked to sign an undertaking to return unspent funds. There should also be a requirement to notify the Council when the project is completed and to send in receipts etc. at that stage.</p> <p>We think that in areas where there are substantial moneys to be spent, councillors may need some help in administering the scheme, e.g. through 'ward based spending boards' including officers (and potentially neighbourhood forums) to oversee the process. Otherwise, there could be a risk of people perceiving pet projects or favoured local organisations scooping up more than a fair share.</p>	<p>The consultation document clarifies that it is "expected" that projects will be delivered within 12 months. Projects may take longer to deliver, and this can be outlined on the project funding form by applicants.</p> <p>Paragraph 4.19 of the consultation document clarifies that "projects will be commissioned by the Council" and therefore the Council will fulfil invoices directly. The following text will be added to the final document to reflect this.</p> <p><b><u><a href="#">4.167 The Council will fulfil invoices directly for those projects awarded NCIL funding.</a></u></b> Conditions may be applied....</p> <p>Monitoring requirements are set out in the CIL Regulations. Your suggestion is helpful, a new paragraph has been inserted.</p> <p>New paragraph 4.18:</p>

Name	Comment	Response
		<p><a href="#"><u>The Council will require notification of project completion and of any unused funds. Any unused funds will be returned to the Council.</u></a></p>
<p>Cllr Hamish Adourian</p> <p>Earl's Court</p>	<p>4.4 Why are applications to be sent to Planning rather than Community Engagement, who will be running Local Life? Will there not be duplication in the processing activities? Appreciate the NCIL budget technically sits with Planning, however.</p> <p>4.5 Why only twice a year? Why not allow submissions to be sent anytime, similar to Local Life?</p> <p>4.6 Assume ward members have the final say even in cases where the proposed project is not deemed to fall into the 'identified priorities'?</p> <p>4.8 Examples of who these are?</p> <p>4.9 Who is responsible for identifying these? Ward councillors should be the ones ultimately responsible for identifying them and being held accountable for them. It is not tenable for the ward priorities to be identified during a short consultation and then fixed for 2 years, as suggested previously in the document.</p> <p>4.11 My view is that applications should be managed by the same team that handle Local Life, rather than duplicate procedures. Ward councillors should be the ones to determine this [ensuring that NCIL Spending reflects community priorities] as part of the</p>	<p>Planning and Community Engagement are working together to align Local Life and NCIL processes, but they are two distinct funding sources. NCIL sits within planning.</p> <p>This will enable all the bids to come in together for consideration rather than awarding funding for those that come in first. This will provide opportunity for all to access NCIL funds.</p> <p>The local community or local community groups/ organisations are best placed to understand needs of their wards/ area. They play a pivotal role in establishing the top priorities for their ward through this consultation and identifying projects that they wish to put forward for NCIL funding through a future Call for NCIL Projects. Ward members will also</p>

Name	Comment	Response
	<p>continuous process of engagement that we regularly have.</p> <p>4.13 Who is doing the shortlisting? Will ward members see the projects that have not been shortlisted?</p> <p>4.14 Under what circumstances would a decision on NCIL funding be made by the Leadership Team?</p>	<p>be aware of the changing needs and priorities for their area through communication with constituents and will consider all projects put forward. Therefore, whilst the top priorities will guide NCIL spending, they will not preclude spending that does not fall within the established priorities for the ward.</p> <p>Examples will be provided. The community priorities will be established through this consultation. As explained above, this does not preclude spending that falls outside of the established community priorities, they are a guide for ward members.</p> <p>Applications will be reviewed by Planning and Place to determine that they can be funded by NCIL as per CIL Regulations. Following this, all applications will be provided to ward members for decision. This process will be managed by Community Engagement in a similar way to Local Life.</p>
St Quintin And Woodlands Neighbourhood	We welcome the fact that project applications will be assessed by officers as well as Ward Members as a basic check to ensure compliance with legislation. But are unsure about the present capacity of RBKC to carry out such a process effectively.	Planning and Community Engagement both sit under the Environment and Communities

Name	Comment	Response
<p>Forum and St Helens Residents Association (Henry Peterson)</p>	<p>Where does the 'People and Place' section sit within the RBKC organisational structure when (as we understand) the planning department is overstretched? How closely will these officers work with the team that oversees all mainstream grant funding to local voluntary organisations (presumably in the Community Engagement team?) How far will the NCIL process and the updated ward-based 'Local Life' funding 'run in parallel', as proposed in the consultation document?</p> <p>In several London Boroughs the allocation of NCIL resources is undertaken by the same team that handles general grant-giving to the local voluntary sector, who have a good appreciation of the needs and capacity to deliver of different community groups.</p> <p>As above, we have concerns about the statement in paragraph 4.6 saying Proposed projects that fall within the identified priorities for each ward will be considered for funding by Ward Members who will select which projects receive funding. This selection process needs to be undertaken in close consultation with the local community in each ward, if wards are to continue to be used as the geographic basis for allocation of NCIL funding.</p> <p>The sentence at 4.14 again introduces some confusion as to who has the final say in releasing NCIL funding. This sentence reads Ward Members / Leadership team will then make a funding decision taking into account the established community priorities for the area and other assessment criteria.</p> <p>If all applications are to be subject to final review by the Leadership Team, it would be more honest to say so from the start. Unless RBKC amends its constitution, we do not see that individual Ward Members would have the executive authority to make final decisions on expenditure (which will amount to £600,000 and more in some wards).</p> <p>On balance we are in favour of the Leadership Team rather than individual ward members making the final and formal decisions, provided that these are based on</p>	<p>Directorate. Planning and Community Engagement are working closely together to align the two.</p> <p>As explained above, this does not preclude spending that falls outside of the established community priorities, they are a guide for ward members. The wording will be amended accordingly.</p> <p>New paragraph 3.4:</p> <p><u><a href="#">The community priorities will be reviewed every 2 years through public engagement. The community priorities will guide NCIL spending, however they do not preclude Ward Members from spending NCIL funds on other priorities.</a></u></p> <p>The consultation document clarifies that it is "expected" that projects will be delivered within 12 months. Projects may take longer to deliver</p>

Name	Comment	Response
	<p>meaningful consultation and where necessary negotiation with residents and community organisations within each ward.</p> <p>We consider the requirement in 4.18 that projects will be completed within 12 months of the funding being awarded is an unhelpful and unnecessary restriction. RBKC has taken 5 years since the introduction of its own CIL regime to come up with proposals for distributions of NCIL. Why should local organisations be limited to submitted project proposals which may run beyond March 2021?</p> <p>We support the view of other respondents to this consultation that it would be very helpful if the RBKC were to set up 'ward bank accounts' which held both NCIL funds and those from the Local Life programme. Many smaller local groups do not have bank accounts of their own, and could then draw down resources from such accounts on the presentation of suitable documentation and records.</p>	<p>and this can be outlined on the project funding form by applicants.</p> <p>Paragraph 4.19 of the consultation document clarifies that projects will be commissioned by the Council and therefore the Council will fulfil invoices directly. The following text will be added to the final document to reflect this.</p> <p>4.17 <a href="#"><u>The Council will fulfil invoices directly for those projects awarded NCIL funding.</u></a> Conditions may be applied....</p>
<p>Kensington Society (Amanda Frame)</p> <p>All wards except Chelsea Riverside, Royal Hospital and Stanley</p>	<p>We agree with the points made by the Ladbroke Association that it would be very helpful if some means of setting up 'ward accounts' can be found. This would enable sums can be drawn down by organisations without bank accounts, or for invoices incurred by organisations on approved projects to be paid direct. Such accounts could be used for Local Life projects as well as for NCIL funds.</p> <p>Paragraph 4.11 states Applications will be managed by Planning and Place who will undertake a due diligence review of project funding applications to ensure that NCIL spending reflects community priorities established through this consultation and is in accordance with the CIL Regulations.</p> <p>As we understand the RBKC Community Engagement Team continues to manage a programme of grants to community and voluntary/third sector organisations in the</p>	<p>Paragraph 4.19 of the consultation document clarifies that projects will be commissioned by the Council and therefore the Council will fulfil invoices directly. The following text will be added to the final document to reflect this.</p> <p>4.17 <a href="#"><u>The Council will fulfil invoices directly for those projects awarded NCIL funding.</u></a> Conditions may be applied....</p> <p>Planning and Community Engagement both sit under the Environment and Communities</p>

Name	Comment	Response
	<p>Borough (the information on the RBKC website on what was called the 'Corporate Services Grant Programme' relates to 2017-19 and is out of date).</p> <p>The Community Engagement Team, we have been informed, is now part of the restructured Environment and Communities Directorate (the management structure chart on the RBKC website is also out of date).</p> <p>Without knowing the staff numbers and capacity of a 'Planning and Place' section it is hard to assess whether such a team will have, or be able to build up, the local knowledge of community groups and residents associations needed to manage what will be a major grants programme running alongside those already operated by RBKC (including the rebadged Local Life). From the outside, it seems questionable to have two separate teams in the same directorate carrying out similar functions of grant bid assessment and 'due diligence'.</p>	<p>Directorate. Planning and Community Engagement are working closely together to align the two.</p>
<p>Victoria Road Area Residents' Association (Michael Bach)</p> <p>Queen's Gate</p>	<p>It looks like an application form needs to be completed for each project proposed for the ward, but it does not provide for "packaging" or "topping up" from other sources, such as main programmes.</p>	<p>The funding application form sets out the following guidance in relation to costs:</p> <p><i>"Will NCIL funding help leverage in additional funding? Have other funding options been explored/ gained to assist, such as match funding or crowdfunding?"</i></p> <p>Your suggestion is helpful, this has been made clearer at paragraph 2.4 of the document.</p>

Name	Comment	Response
		<p>2.4 ...generate crowdfunding. <a href="#"><u>NCIL funding could be packaged up with funding from different programmes or be used by communities to top up existing Council programmes.</u></a></p> <p>This will also be made clearer on the funding form and application guidance:</p> <p><a href="#"><u>Will the use of funds be packaged with funding sources for a different programme, or top up funding for an existing programme?</u></a></p>

**Question 8: Do you have any comments on the NCIL Project Funding Form?**

Name	Comment	Response
Fetter Lane Moravian Church (Claire Maxwell)  Chelsea Riverside	I would appreciate if those of us who have taken the time to fill in this form would also be sent a link to the Project Funding Form once the areas for prioritisation have been discerned.	All respondents will be notified of the Call for NCIL Projects.
Friends of Holland Park (J Kettlewell)	Again, lots of form and took time to find this.	Your comment is noted.

Name	Comment	Response
Holland		
<p>Ladbroke Association (Sophia Lambert)</p> <p>Wards: Colville, Norland, Notting Dale and Pembridge</p>	<p>There may be worthwhile projects that span more than one ward (e.g. high street projects or something benefitting the Portobello market) or involve more than one local organisation. We think such cooperation should be encouraged. The application form as at present drafted would be difficult to fill in for such projects.</p> <p>For projects being put forward by more than one group, the form should ask for a lead group (who would take on the accounting responsibility) but also request details of partners.</p> <p>We think there should be a separate form for projects spanning more than one ward, otherwise the form will just become too complicated.</p> <p>You say you would like match funding. There is no question on this.</p>	<p>Your suggestion is helpful, and this will be made clearer on the funding form and application guidance.</p> <p>Your suggestion is helpful and Part B of the funding form will be amended.</p> <p>Amending Part B of the application form will not complicate the existing form.</p>
<p>Metropolitan Police Service</p> <p>(Vincent Gabbe)</p>	<p>Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation concerns S106/CIL contributions to mitigate impact on crime.</p> <p>We are pleased to see that the Royal Borough of Kensington and Chelsea (RBKC) CIL Regulation 123 list includes 'Policing Resources &amp; Emergency Services'. The MPS are having to move towards securing S106/CIL contributions from development due to the impacts on crime and are in the process of working up a formula to calculate these contributions.</p> <p>The new RBKC Local Plan (2019) targets the delivery of 4,400 homes over the next five years. The proposed growth in homes, offices and other uses will significantly increase the need for policing and the cost for associated infrastructure.</p> <p>Breakdown on Non Property Related Infrastructure sought by MPS</p>	<p>The consultation is about establishing community priorities to help make best use of NCIL funds, the process for communities to access NCIL funding and the allocation of funds towards projects put forward by local communities. The consultation does not relate to securing planning contributions.</p> <p>We welcome that you are preparing a developer contributions formula. Please share this with us when it is has been finalised.</p>

Name	Comment	Response
	<p>The MPS are working up a formula to calculate financial contributions and propose to charge within the RBKC Local Plan period. A breakdown of non-property related infrastructure sought by the MPS in the future is detailed below. This list has been taken from other Police and Crime Commissioners who are already receiving financial contributions;</p> <ul style="list-style-type: none"> <li>• Staff set up costs <ul style="list-style-type: none"> <li>- Uniforms.</li> <li>- Radios.</li> <li>- Workstation/Office equipment.</li> <li>- Training.</li> </ul> </li> <li>• Vehicles <ul style="list-style-type: none"> <li>- Patrol vehicles.</li> <li>- Police community support officers (PCSO) vehicles.</li> <li>- Bicycles.</li> </ul> </li> <li>• Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.</li> <li>• CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.</li> <li>• Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.</li> </ul> <p>Summary</p> <p>This representation notes that the MPS have to move towards securing S106/CIL from development due to the impacts on crime. The MPS would like to have the ability to receive financial contributions during the RBKC Local Plan period and are in the process of working up a formula linking to development impacts.</p>	

Name	Comment	Response
	<p>We consider that it would be sensible to arrange a meeting to discuss how the MPS infrastructure requirement can be accounted for within RBKC Council's Section 106 Agreement and/or Community Infrastructure Levy.</p> <p>We will look forward to hearing from you when you have had a chance to review the contents of this representation.</p>	
<p>St Quintin And Woodlands Neighbourhood Forum and St Helens Residents Association (Henry Peterson)</p>	<p>We feel that the application form is OK with the following provisos</p> <ul style="list-style-type: none"> <li>• It should be made clear that projects do not have to involve 'infrastructure' as such and can be 'one off' revenue rather than 'capital schemes. The reluctance to see NCIL funds for support of projects with ongoing revenue commitments is made clear in the applications form</li> <li>• Estimated timescales for delivery of projects should be allowed to cover more than one financial year. Since this form of funding is 'one off' we do not see the need to impose a restriction of completion before year end,</li> </ul> <p>The requirement to identify and address 'the demands that development places on the area' may confuse some applicants and needs explanation by way of examples, In a very densely developed London Borough, such 'demands' are wide ranging, as NPPG advice acknowledges.</p>	<p>Part B of the funding form will be updated to reflect these points.</p>
<p>Victoria Road Area Residents' Association (Michael Bach)</p> <p>Queen's Gate</p>	<p>The form seems to be similar to CLLL applications, which assumes that local residents would be responsible to holding and spending the money, rather than be managed/implemented by the relevant department of the Council. Providing litter bins, pedestrian crossings, commissioning CCTV, etc may not be something where the management may not be appropriate for local residents to manage.</p>	<p>Paragraph 4.19 of the consultation document clarifies that "projects will be commissioned by the Council". In some cases this may include delivery of the projects. The following text will be included.</p> <p><u>...third party organisations. In some cases, the Council may be the delivery partner where the project relates to the provision of a Council service. For example, changes to the highway would</u></p>

Name	Comment	Response
		<a href="#"><u>need to be agreed and carried out by the Council.</u></a>
Simeon Nnyombi Golborne	<p>I have no particular comments on the form but would wish to give some background to the reasoning behind the identified priorities.</p> <p>84 Southern Row is a block which was designed under a 'poor door' regime and this did not just stop on the concept that it had access only designed for the 'poor' shared ownership and Council tenants with separate access for the private units. There is further class segregation as follows:</p> <ol style="list-style-type: none"> <li>1. An open space was designed for only the private housing with no access permitted for the affordable and social housing residents.</li> <li>2. Car parking in the basement was designed for only the private owners and no provisions were ever made for the shared ownership and Council tenants. Instead, we were required to enter into agreements banning us from applying for resident permits.</li> </ol> <p>It would appear that the above injustices were promoted through the planning system as can be seen from the planning documents which supported the above decisions. It would be appreciated if the Council would undo the injustices through use of these funds by providing a play area for our children within the site of a poorly utilised and designed 'pocket park' at the bottom of the building and/or within the unutilised roof-terrace space of the development. The Council did have the power to impose such conditions on the developer at the time planning was granted but it is unclear why it never did so at the time the planning application for the development was determined.</p>	Your comments are noted and you will be notified when the Call for NCIL Projects is undertaken to put forward these projects.