New Local Plan Review

Summary of Consultation Responses: Issues and Options

November 2021

Contents

Summary of key issues

Please note this is intended to be a summary of the representations received. The comments received, and the Council's response is included in the detailed consultation schedule.

1. Introduction

Q 1.1:   What do you think should be included in the New Local Plan's vision?

Comments from 59 stakeholders were received.

Nearly all those who responded were supportive of the key elements of the vision. However, a number of comments were made requesting a change in emphasis, or in some cases, a view that further issues needed addressing.

In particular a number of consultees suggested that the vision should be amended to reflect:

- the need for a strong and vibrant economy. A number of those living in SW Chelsea made specific reference to the need to protect the commercial character of the Lots Road Employment Zone, and to prioritise commercial uses, rather than any additional housing.
- A greater emphasis on the need to protect the historic character of the borough (and Chelsea in particular), and to ensure that new development helps maintain a sense of place.
- The Council's overall ambition should be to care for the wellbeing of existing residents

The majority of other comments related to a more detailed assessment of what the Local Plan should consider, rather than a critique on the vision itself. This included:

- A need for greater clarity as to how the Council's "green" ambitions can be achieved. This includes consideration as to how the Council will consider potentially counter objectives, such as the need to retrofit an historic building and the need to be carbon neutral.
- Need specific policies to consider air, light and noise pollution.
- Detail on how to achieve zero carbon by 2050.
- Practical solutions to reduce inequality.

- Need to enhance the townscape, to have stronger policies to protect architectural heritage and to preclude any new buildings, both within, and outside of conservation areas.
- A need to meet the needs of our residents through the provision of affordable housing.
- A potentially counter view that much of the borough was already over provided with housing/ affordable housing and we should not slavishly follow the borough's housing targets.
- Need to distinguish between different types of housing. Resist housing bought by absentee landlords but support the provision of more affordable housing.
- Greater support for a walkable neighbourhood and for the protection of those facilitates values and uses by residents.
- Need for new developments to provide the social and community facilities where need is created by that development.
- Support/ recognition need for extensive development on our main strategic sites, with bot Kensal and Earl's Court being specifically referenced.
- Support for reference to need to support cultural offer.

2. Key Concepts

Q 2.1:   Please give us your views on the key concepts, should there be any others?

Comments from 36 stakeholders were received.

There was considerable overlap in the comments received concerning the vision and the key concepts.

There was widespread support for the proposed key concepts. The need for an inclusive borough which aimed to narrow the gap between different sections of society was particularly welcomed by many.

Many of those who commented suggested additional "key concepts" rather than remove the concepts that had been identified.

The following additional "key concepts" were suggested:

- The borough should be "more open", with more open space provided.
- Greater emphasis should be put on the "cultural and creative" nature of the borough.
- The borough should be seen, and planned, as a series of villages.
- A healthy and productive borough.
- A borough which values its heritage and committed to conserving its unique character.
- A safer borough.
- A flexible borough- particularly in the way universities may need to operate in the future.
- A borough of permanence – reduce the transience of residents and businesses, through fostering the longevity of local communities.

In addition, the comments on the following issues were made:

- The provision of all forms of housing, but particularly "affordable" should be at the heart of the Local Plan.
- In contrast, others took the view that there was too great an emphasis on the provision of housing.
- Need for more robust enforcement, including around measures to support a carbon neutral borough.
- Need to recognise that the planning polices will not be effective in the Council "narrowing the gap" between the rich and the poor.

- Need recognition that much of the north of the borough is poorly served by public transport.
- Rejection of tall buildings on the Kensal Canalside OA site as well as a more general recognition that tall buildings will rarely be appropriate and are not a sustainable form of development.
- There is a particular need to protect our heritage assets.
- Need to support high quality design, but also flexibility as "beauty is in the eye of the beholder".
- Need for meaningful consultation, be this by the Council and by developers.
- Need a long-term tree strategy and more green space.
- Theoretical support for "greening the Borough" but "without excessive cost".
- Better balance needed between needs of vehicular transport and bicycles.
- Support for concept of good growth – but this must be tempered by the borough's other needs.
- Need to fully recognise the impact of Covid-19, and the need for future resilience in the commercial sectors.
- Need to support creative industries and cultural facilities.
- Reject the proposed dilution of the Lots Road Employment Zone through provision of more market housing.
- Reject an Academy on Lots Village.
- Need to recognise role of the tourist sector, including short term lets.

3. Places

Q 3.1: Please let us know your views on these areas of change?

Comments from 51 stakeholders were received. comments agreed that the places section is reduced in size with focus on priorities for change whilst more clarity is needed on exactly what that means.

Comments on the following issues were made:

- Growth areas should be determined according to the type of growth - comments requested clarification between the various types of areas of change e.g. smaller areas of change vs opportunity areas.
- The Lots Road area should focus on the employment zone and amenity for the area
- Earl's Court's diverse culture and history needs to be recognised and proactive engagement is needed for its development with comprehensive redevelopment that includes connections, sustainability, infrastructure, help for jobs as well as a range of homes. Collaboration between authorities should happen.
- Areas of change should not restrict change outside of these areas inappropriately
- Concerns with the capacity for growth at Kensal Canalside
- Support for areas of change and recognition of areas of international/national reputation (South ken) Request for more detail as to how these areas can 'thrive'
- Kensal Canalside should reflect the adopted SPD
- Change and redevelopment at Nottinghill gate supported
- Specific reference to the safeguarded Cremorne Wharf at Lots Road for water borne freight cargo handling by ministerial direction needed if it remains
- Concern over the weight the character study will have.
- Places that aren't just town centres should be included
- Support for Lancaster West area being planned for co-design
- More areas should be looked at as renewal areas such as Chelsea/Westminster and Old Brompton as well as colleges South Ken Campus
- Focus should be given to homes for the elderly

Q 3.2: Last time you told us that we had identified the correct Places. You can let us know your views again.

Comments from 33 stakeholders were received which largely supported the proposed places but comments were made on the following issues:

- Concern was raised that Earl's Court has not been identified as a 'Place' and it should be
- Disagreement in the comments as to whether Notting Hill should be included with Portobello Rd , or sections of Ken Church St or instead Portobello and Golborne Road be linked
- Concern that there are many other smaller recognised 'places' that aren't identified
- Suggestion that Sloane St be included in the vision for Knightsbridge
- Concern that Lots Road cannot accommodate growth planned
- Kings road should be more than just 'consolidated'
- The potential for change at Latimer Road should not be overplayed
- Thames Policy area should be noted
- Co-design outside of town centres should be encouraged
- Flexibility should be included into places
- Kensal and Lots road should look to restrict heights
- Covid impacts should be prioritised for action in these places

Q 3.3: The Council will look again at the existing visions for these Places and consider whether they remain appropriate. Do you have any views on the shortened visions for the Places as drafted in the table above? Is there anything else we should include?

Comments from 22 stakeholders were received

- Notting Hill should be included as part of portobello
- Earl's Court should become a 'Place'
- Kings Road vision should maintain low rise buildings

4. A Zonal Planning System

No questions were asked in this chapter.

5. Locations for Future Development. A 'call for sites'

Q 5.1: **Are you aware of any sites that may be suitable for new development?**

The following new sites were proposed by respondents as having a potential for new development:

- Chelsea Fire Station
- Notting Hill Police Station
- Emmanuel Kaye Building, Manresa Road
- 391-433 King's Rd (backing onto Ann Lane)
- 347-349 King's Rd
- Back of house buildings at Natural History Museum
- Colebrook Court, 75 Sloane Avenue
- Portobello Green Arcade
- 9 Old Court Place
- 1-31 Elkstone Road
- Ladbroke Grove Station
- The area below the Westway flyover on Bramley Road
- M&S building on 85 King's Road
- King's Walk Shopping Mall
- Barlby Road, open land site opposite the school
- Portacabin opposite North Kensington ambulance station
- Bays 17-19 Maxilla Walk
- Railway arches opposite Latimer Road Station

In addition, the following non-specific type of site were also identified.

- Underground and rail stations
- Land around railways and above the open tube lines
- Land under the Westway

Q 5.2: **How do you feel about the sites that were identified in the first round of call for sites? Do you find them suitable for development? Do you agree with their current categorisation?**

Concerns were raised over the identified potential quantum of development, in particular regarding Atlantic House, South Kensington Station wider site, and Lots Road sites.

The agents on behalf of the owners of the following sites have expressed their disagreement over the identified potential of sites to be allocated for development:

- 136-142 Bramley Road (the Ribbon Building)
- The Plaza, 525 Kings Road
- Sloane Square House, Holbein Place
- Holland Road (The triangle site next to the Holland Park Roundabout)
- Land Between Ladbroke Grove and Portobello Road
- South Kensington Station wider site

The Council was asked to reassess the sites and reconsider the potential of those sites to be allocated, changing it from "low" or "medium" to "high".

Regarding two Opportunity Areas, Kensal Canalside and Earl's Court, it was noted that the development should be of an exemplary quality as they will set the tone for development in the borough for generations to come.

Holland Road (The triangle site next to the Holland Park Roundabout)

A representation was received from the West Holland Park Forum objecting to the allocation of the triangle site for any development. This representation suggested that this site should be designated as Local Green Space.

6. Green-Blue Future

Issue 1: Climate change and building design

Q.6.1. Which of these options do you support?

Comments were received from 41 stakeholders, all of which were at least supportive in principles of the options to reduce carbon emissions presented in the Issues and Options consultation. The responses can be categorised into the following two groups.

- Supportive of all options presented to reduce carbon emissions in the Borough. However, would like to see the NLPR be even more ambitious in requiring development to meet more demanding carbon reduction targets than those presented. Responses from residents and Resident Associations fall into this group.
- Supportive in principle of the options presented to reduce carbon emissions in the Borough. However, would like to see the NLPR scale back its ambitious carbon reduction requirements for new development so that we don't go beyond the requirements of the London Plan. Citing concerns over development viability, particularly with regards to options for third-party standards and unregulated emissions. Developer responses fall into this group .

Q.6.2. Do you have any other options to suggest?

22 responses were received which made a range of suggestions.

- Again, several comments suggested the NLPR be more ambitious in requiring development to meet more demanding carbon reduction targets than those presented. Responses from residents and Resident Associations fall into this group.
- A number of responses identified the need to have a specific policy on, or ensure the NLPR clearly considers how carbon reduction requirements for new development apply to existing buildings and retrofitting works, including for historic and listed buildings, as well as buildings in conservations areas.
- In the case of listed buildings and buildings in conservations areas. Resident Associations, highlighted that the Council should change the way it considers the environmental impact of planning applications in its decision making. Arguing that minor harm in conservation terms could be outweighed by environmental benefits.
- Respondents also highlighted the need for policies controlling odour and light pollution in the Green-Blue future chapter of the Plan.

Issue 2: Air quality

Q.6.3. Which of these options do you support?

Comments were received from 35 stakeholders, all of which were supportive of the principle of controlling air pollution and adopting the London Plan air quality neutral approach as a minimum.

However, many comments expressed a strong desire to see the Council go beyond an air quality neutral approach and adopt an air quality positive approach. These responses were from residents and Resident Associations.

In addition, a number of comments, again from residents and Resident Associations expressed serious concern about air pollution caused by construction activities in the Borough. Called for stricter control of construction sites and stronger enforcement action from the Council.

Q.6.4. Do you have any other options to suggest?

26 responses were received, in which many again expressed a strong desire to see the Council go beyond an air quality neutral approach and adopt an air quality positive approach. These responses were from residents and Resident Associations.

Issue 3: Noise and vibration

Q.6.5. Which of these options do you support?

Comments were received from 35 stakeholders, the majority of which called for tighter control of noise and nuisance in the Borough.

Responses from a number of residents and resident associations expressed serious concern over the impact of construction in the Borough and the noise and vibration it creates. Arguing that the Council should be more restrictive of construction site activities, including working hours.

Concern over the impact of air conditioning units was also raised.

Again, a number of comments called for the Council to introduce a policy controlling light pollution and odours in the NLPR.

Finally, two comments highlighted that the NLPR should make explicit reference to the Agent of Change Principle in its noise and vibration policy.

Q.6.6. Do you have any other options to suggest?

26 responses were received, in which most argued again for further restrictions on construction sites and activities, including working hours specifically, as well as the need for a policy controlling light pollution and odour.

A number of comments also suggested the Council require ambient noise measurements, before and after development as a planning condition.

Issue 4: Flood risk

Q.6.7. Which of these options do you support?

Comments were received from 29 stakeholders who supported most of the options suggested in terms of flood risk and drainage. Some stakeholders raised the flooding suffered in July and considered that further requirements to address flood risk in basements were needed. Most of them supported the restriction of sleeping accommodation below the breach level and requested a condition or a reference in the deeds to ensure new owners are aware of this. Queries were raised about insurance of flooded properties and about what will the Council do as a result of the flooding event.

Respondents supported natural flood management, SuDS, water re-use, water harvesting and efficiency measures. Surface water run-off reduction was also supported but allowing flexibility to reflect the site's constraints and the need to account for other infrastructure. The increase in impermeable surfaces and how breaches were enforced were raised.

Council's response

The policy will be divided into 3 different policies to reflect the different aspects covered: flood risk, surface water drainage and water infrastructure. The draft policy will be tightened for basement development by requiring flood risk assessments for any basement regardless of its location. Sleeping accommodation will also be restricted below the breach level as it is recognised that basements and lower ground properties are more vulnerable to flooding. Resilience and adaptation will also be included in the draft policy.

The Council will scrutinise Thames Water's Independent Review of the flooding event and will undertake their own investigation. Findings of the investigation will be published in due course.

The SuDS policy will be tightened to reflect the need for more natural SuDS and to protect planted gardens.

Q.6.8. Do you have any other options to suggest?

Comments were received from 21 stakeholders. The need for an article 4 direction to control impermeable surfaces was raised. Thames Water referred to Policy SI 5 of the London Plan 2021 which aims to protect water supplies and resources and improve water infrastructure. Other suggestions included the reference to the multiple benefits of green infrastructure and the need to protect planted gardens.
Most of the stakeholders repeated the issues around the need to increase permeability, the need to investigate the flooding event, the need to account for the site conditions when implementing SuDS and support for water re-

use. Thames Water supported the maintenance and operation of the Thames Tideway Tunnel and the implementation of pumps for basement development. Some stakeholders raised concerns over the use of pumps to prevent sewer flooding in basements as they thought they could increase flood risk in neighbouring properties. Other stakeholder wanted to make pumps compulsory in existing basements.

There was a reference to raising contributions for SuDS implementation.

Council's response

Policy SI 5 of the London Plan 2021 will be referenced in the Water Infrastructure section. The draft SuDS policy will refer to the retention of planted gardens and the increase of permeable surfaces and green infrastructure to enhance natural drainage. Reference to the multiple benefits of green infrastructure will be included in the supporting text.

We consider that an article 4 direction will not be required as we have robust policies in place to ensure development does not lead to an increase in impermeable surfaces.

Issue 5: Biodiversity

Q.6.9. Which of these options do you support?

Comments were received from 32 stakeholders all of which were supportive, at least in principle, of the ambition to introduce a biodiversity net gain requirement in the NLPR.

A few comments highlighted concerns about the viability delivering the biodiversity net gain ambition. These were all responses submitted by developers.

Q.6.10. Do you have any other options to suggest?

23 responses were received, in which the need for the Council to support the provision of open space, as well as protecting existing and planting additional street trees throughout the Borough as a means of supporting biodiversity were highlighted.

The need for a policy controlling light pollution was again raised in this section of the issues and options consultation, citing the impact of light spill on animals and habitats.

A number of responses also called for the NLPR to specifically support the use of integrated universal swift bricks and provision of swift nest boxes to protect swift populations which are in severe decline in urgent need of conservation action.

Issue 6: Green infrastructure

Q 6.11:   Which of these options do you support?

Comments were received from 35 stakeholders all of which were supportive, of providing green infrastructure with new development and the urban greening factor requirements.

The vast majority of respondents supported option 1 – i.e. to adopt the UGF targets of London Plan Policy G5. Only a small number of comments disagreed with this option, arguing that it is not ambitious enough.

There was then a split with about 60% of respondents supportive of options 2 and 3 and 40% who did not support these options. Those who didn't agree with options 2 and 3 argued that UGF target requirements for minor development and contributions where there is UGF shortfall would be too onerous and undermine development viability.

In addition, several responses highlighted that the UGF target should not replace the need to provide open space and raised concern about the effectiveness of green walls and roofs.

Q.6.12. Do you have any other options to suggest?

23 responses were received, in which respondents predominantly focused on trees. Calling for more tree and hedge planting and raising concerns about the felling of trees in the Borough.

As well as highlighting the importance of trees, respondents called for more SuDs and permeable paving and for greater restrictions on front and back gardens development.

Finally, the Labour Group of Councillors suggested loosening restrictions on roof gardens, provided

Council's response

We will take forwards options 1 and 2 to require UGF in all developments. Option 3 will not be taken forward as the Council prefers green infrastructure to be delivered on site. Requiring contributions could incentivise developers to pay rather than to deliver it on-site.

Issue 7: Waste management

Q.6.13. Which of these options do you support?

27 Stakeholders responded to Q.6.9. 3 did not provide comments or indication a view on the Options.

A total of 13 support safeguarding Cremorne Wharf (strategic Waste Management Option 1). Support was from 4 Residents' Associations, 2 residents, 2 councillors, 2 local businesses/organisations and 1 developer. The GLA and PLA support this option as it is consistent with the London Plan and Safeguarded Wharves Review.

A total of 13 expressed support for a meanwhile open space (Strategic Waste Management Option 2). Support for this Option was from 5 Residents' Associations, 4 residents, 3 councillors, 2 local businesses and the PLA.

A number of comments were received to Strategic Waste Management Option 2. One resident objected to using Cremorne Wharf for future waste management purposes due to associated noise and odour concerns, another questioned whether it was viable to propose a meanwhile use if the site is a safeguarded wharf and could be used for waste management purposes at any time in the future. A Residents' Association also questioned what would happen to the meanwhile use if a proposal came forward at the wharf.

The GLA and PLA do not object to a meanwhile open space subject to the Council actively promoting Cremorne Wharf for water-borne freight handling and waste handling use. The GLA highlighted that the waste uses should be prioritised above other uses. Thames Water highlighted that part of the site would need to be retained as operational land for Thames Tideway Tunnel.

8 responses supported the council engaging with other London Boroughs and the Western Riverside Waste Planning Authorities to secure spare apportionment capacity (Strategic Waste Management Option 3). The support for this option came from 3 residents, 2 local businesses/organisations, 1 Residents' Association, 1 developer and 1 councillor. London Borough of Hammersmith and Fulham highlighted that there is surplus waste management capacity in their borough and welcome further discussion on waste management.

A number of stakeholders also raised comments around the operational aspect of waste collection which sit outside the scope of the Local Plan. The suggestions include requiring plastics to be collected/returned to producers, delivery companies collecting discarded boxes on their deliveries.

Q.6.14. Do you have any other options to suggest?

19 stakeholders responded to Q6.14. The responses offered the following suggestions on waste management in the Borough:

- Clean power generation from waste in large developments
- Local street level ground-source heat pumps for community heating and hot water supplies.
- Waste and recycling storage areas should be well lit.
- Conversion of vaults from waste storage areas to internal space should not be permitted.
- Tighter rules on waste disposal for commercial premises to ensure waste cannot be left on streets when awaiting collection.
- Encourage pick up sites / receptacles for waste arising from home deliveries
- Separate food waste collection for composting, encourage composting
- Introduce charging by weight for non-recyclable waste
- Advice on bids and bin sheds on how to recycle.

The Environment Agency suggest that Policy include reference to enclosure of waste sites as set out in London Plan Policy SI8.

7. Homes

Issue 1: Delivering the homes that we need

Q.7.1. Which of these options do you support?

Q.7.2. Do you have any other options to suggest?

63 consultees responded to the questions related to Issue 1 Options (38 to Q.7.1. and 25 to Q.7.2.)

Overall respondents were supportive of both options, with 16 consultees in favour of optimising each site using a design led approach (Option 1) and 11 approved benchmarking floorspace against the nationally described housing standards (Option 2). One respondent in favour of Option 2 believed it will help to limit 'prime' market.

However, a small number of comments were not supportive of those options. Respondents opposing the design led approach expressed concerns around high density and tall buildings. Two comments expressed concern that Option 1 will have the effect of creating mainly smaller dwellings which are not appropriate for families. Regarding introducing a prescribed floorspace limit (Option 2), one respondent commented that this was a blunt tool to include within policy. Another comment was that it may limit residential development opportunities.

Other more general comments were received which can be categorised as follow:

- Housing must be sufficiently flexible, address local housing need and reflect individual site circumstances
- Concern that the housing target not realistic
- Several comments pointed out that the term 'optimise' should be used instead of 'maximise'

The GLA support the housing target, the Council's approach to the optimisation of development through design-led approaches and our intention to protect numbers of existing homes by limiting the merging of two homes to form a single larger one.

Issue 2: Protecting existing homes

Q.7.3: Which of these options do you support?

Q.7.4: Do you have any other options to suggest?

Overall, the three options were broadly supported. Option 1 is about resisting the amalgamations of new homes and this was supported by 11 respondents or 37% of those who responded to this question. 10 respondents or 33% agreed that we should resist the loss of HMOs (while sub-standard HMOs can still be improved to bring them up to standard). Finally, 12 respondents or 40% were in favour of requiring the loss of all existing residential floorspace and units to be replaced by at least the same number of homes and floorspace or at higher densities to optimise the site (Option 3).

A small number of consultees did, however, object to some of the options. One consultee supporting Option 1 believed we desperately need smaller dwellings. That same respondent nonetheless believes that exceptions could be made for temporary amalgamation to allow elderly people to live independently for longer. A few comments believed we should retain the current policy which recognises the need of family sized accommodation. One supported Option 1 but with an added clause of an upper floorspace limit akin to existing policy.

Several comments also raised that short-term lets and Airbnb in the Borough should be more controlled.

Issue 3: RBKC Community Housing

Q.7.5: Which of these options do you support?

Q.7.6: Do you have any other options to suggest?

Comments from 38 stakeholders were received in total.

Options for when community housing is triggered

Overall, the options to keep the existing 650 sqm trigger for community housing (Option 1) and to raise the trigger to major development as per national policy (Option 3) were supported, while opinions regarding setting a lower threshold of 500 sqm (Option 2) were more divided.

- 6 respondents were in favour of keeping the existing 650 sqm trigger for community housing while 1 was against, arguing that lower limits are a disincentive to development.
- While 6 respondents were supporting lowering the community housing threshold to 500 sqm, 4 were opposed to it. One respondent expressed concerned around viability but would support if proven viable. The reasons given are generally around hindering development. One consultee believed the Council would need to make an exceptional case to lower the trigger so far below national policy. Another comment expressed concerns around viability and is suggesting that the higher national figure be applied on a selective basis where the location and planning context makes it necessary.
- Option 3 to raise the trigger as per national policy was the most popular option with 10 respondents in favour. Most of these were developers/landowners. However, 2 were against it, one of them arguing that it would be a highly regressive step.

The GLA supported the lower floorspace threshold of 650 sqm at which affordable housing requirements are triggered.

Options for percentage of community housing

There is clear support for both options and no opposition. 11 consultees were in favour of Option 1, which proposes that where the floorspace triggers community housing, if 35% community is provided and other policy requirements are met, use the fast-track process. There was also overwhelming support for Option 2, which requires 50% of community housing on public land and reflects the London Plan.

Options for which community housing products to secure

These options set out the proposed Community Housing tenure mix. Again, all options were supported with no opposition. However, a small number of responses from RA's expressed exclusive support for option one and did not support option 2 and First Homes.

Option 1 introduces the proposed tenure mix for Community Housing i.e., 70% social rent and/or London Affordable Rent, 30% intermediate at London Living Rent (LLR) at Notting Dale ward level across the Borough. In Kensal Canalside and North Kensington, the 30% intermediate homes can comprise 25% First Homes and 5% at LLR at Notting Dale ward level.

Option 2 is the same as Option 1 although the First Homes approach described above only apply to Kensal Canalside.

The GLA confirmed that the affordable housing tenure mix of 70:30 meets the requirements of Policy H6 of the Local Plan 2021

Options for payments in lieu

There was more support for Option 2 (8 comments) which states that we should specify the situation for when payment in lieu is suitable – for example small sites. Support for option 2 was expressed by residents and RAs.

Option 1, which proposes to keep the current approach to require to calculate payments in lieu where relevant, was also supported albeit by less respondents, most of which were developers or planning agents. There were, however, a few comments opposing both options – for example one consultee was against payment in lieu in general. Again, these responses were from residents or RAs.

In response to Issue 3, other comments insisted upon the importance of providing homes for key workers. This was a recurrent concern across the comments.

Several consultees were supporting a site-specific approach to affordable housing delivery in Opportunity Areas.

Issue 4: Housing for older people

Q.7.7: Which of these options do you support?

Q.7.8: Do you have any other options to suggest?

Comments from 27 stakeholders were received of which 18 to Q.7.7. and 9 to Q.7.8.

Most comments were supportive of the options proposed. Option 2 to support the provision of older people's housing – extra care, sheltered housing and care homes in order to meet local needs (our existing policy) was the most supported option with 12 comments in favour. This is followed by Option 1 which proposes to adopt higher accessibility standards (current approach) and 3 which would require the provision of *affordable* extra care from extra care schemes. Option 5 which would provide clarity that community housing will not be sought from care home accommodation was supported by 8 consultees.

Option 4 would require the provision of community housing in extra care schemes with flexibility for whether this is *affordable* extra care or not. This was the least supported option – with 6 comments in favour and 2 comments against it. The consultees opposed to Option 4 argued that the main shortage in the Extra Care sector is for affordable housing.

Other comments related to the need to provide help and guidance to those who wish to downsize, and there was a lot of opposition against the provision of 'luxury' housing for older people schemes in general. Several comments mentioned the care home that was lost. This will be re-provided at Lots Road site with a minimum of 65 extra care homes.

Issue 5: Other housing products

Q 7.9: Which of these options do you support? You can pick more than one.

Q 7.10: Do you have any other options to suggest?

Issue 5 introduces options on other forms of housing such as Built to Rent (BtR), Co-living accommodation, self-build, hostels and other accommodation for vulnerable people and student accommodation.

Q 7.9 received 23 comments and Q 7.10. received 7 comments. Overall, the comments were supportive of the different options.

Options for Built to Rent

Option 1 supports BtR schemes based on the interim findings of the LHMA but does not support large scale BtR schemes on the Opportunity Areas sites.

Option 2 would require a range of community housing products from BtR schemes. These are likely to be 35% discount market rent of which 70% should be at London Affordable Rent and remaining 30% at London Living Rent at Notting Dale ward levels.

There was only slightly more support for these options than opposition. Those opposed were largely developers or planning agents who expressed concern around restricting Built to Rent in Opportunity Areas as this is not conformity with the Local Plan, while another argument pointed to the lack of evidence to support this policy. Most of these were developers/landowners. There was also one comment about Build to Rent model having high rents and service charges and that these tend to escalate.

Other forms of housing

- 5 respondents supported Option 1 which proposes that co-living accommodation could be supported if further work shows there is a need/demand for them in the Borough. One respondent commented on the scope for exploring multi-generational models of co-living for older people as it can provide downsizing opportunities. One consultee did not support the Option but did not provide detailed comments.
- 7 respondents supported Option 2 which proposes to continue supporting Self-build in the Borough. Two comments were against this Option, pointing out the shortage of sites in the Borough.
- 4 respondents supported Option 3 which proposes to continue to support Hostels and other accommodation for vulnerable people. One respondent

expressed concern that hostels should be distributed more evenly across the Borough and another one about the impact of hostels on other residents.

Options for Student Accommodation

Most comments were supportive of the options, with only 3 negative comments.

Option 4 was the most popular Option in terms of support (8 respondents). This Option supports proposals for new student housing only where linked with a higher education institution located in the Borough. However, one consultee commented that while student accommodation should be linked with higher education institutions, this should not only be within the Borough.

Option 2 i.e., allow student accommodation to change to self-contained homes, where it is demonstrated it is surplus to requirement of the higher education institution, was the second most popular option.

Option 1 which allow student accommodation to change to other types of shared living accommodation such as HMOs and Option 5 (require **all** bedrooms in purpose-built student accommodation to be *affordable*) gathered support from 5 respondents each.

Finally, the last two options which gathered less support were Option 6 (requires **maximum** level of bedrooms in purpose-built accommodation to be *affordable* as per London Plan Policy H15) and Option 3 (supports proposals for new student housing only where they do not compromise the provision of general housing and create mixed balanced communities). One respondent did not support Option 6 on the basis that there should be a 35% viability threshold specified, in line with the London Plan. On Option 3, one respondent mentioned that there have been no applications for new student housing in the Borough since 253-259 Kensal Road (2013) and think applications are unlikely as market housing will outbid this type of accommodation. Another consultee wrote that clarity should be provided on what 'mixed and balanced' community and further guidance on circumstances in which ability to provide general housing is compromised. Respondents who did not support option 6 were a mix of developers, planning agents, residents and RA.

Gypsy and Traveller Accommodation

Option 1 (retain Local Plan Policy CH6 as it is) was supported by 5 respondents, while Option 2 (amend policy to support the extension of the existing Stable Way site to accommodate more pitches) was supported by 3 respondents. One respondent suggested that the Option 2 should be

dependent on the level of need whilst another respondent suggested that there is no need in the Borough and that Stable Way should be redeveloped.

The GLA welcome the Joint Gypsy and Traveller Accommodation Needs Assessment to be prepared with London Borough of Hammersmith and Fulham. LBHF welcome further joint working and discussions on the topic.

Other Comments on Issue 5

There were some additional comments and suggestions including ringfencing a percentage of HMOs for student use and that the grant of permission for HMO conversion include condition forbidding the use as short term holiday lets.

There was also a general comment that the other housing products contained within Issue 5 should all be standalone policies and that Student Accommodation in particular should be its own dedicated policy.

Issue 6: Estate renewal policy

Q.7.11: Which of these options do you support?

Q.7.12: Do you have any other options to suggest?

Q.7.13: We consider that most parts of the retained policy CH5 are still fit for purpose, but it can be updated to be further strengthened as described above. We would be guided by the community on this. Please provide us with your views.

A total of 23 comments only were received on Issue 6 including 14 on Q.7.11, 4 to Q.7.12 and 5 to Q.7.13.

Issue 6 options were broadly supported, with no negative responses received. Most respondents did not provide detailed responses.

8. Town Centres

Issue 1: Covid-19 recovery and maintaining the vitality of our centers

Q 8.1 and 8.2 Town centre first?

Comments from 35 stakeholders were received.

Of the 35 stakeholders who responded, all endorsed option 1, for the Council to take forward its current position in supporting the provision of small shops outside, as well as within, out town centres. This was seen as an appropriate way of improving the access of residents to the services that they require.

Fewer comments were made concerning the Council allowing the provision of larger offices across the borough as well as within the town centres. 19 stakeholders stated they supported this approach with just 4 rejecting it. The reasons for concern included:

- allowing offices across the borough could "dilute demand" within our town centres and have the unintended consequence of reducing the vitality of our town centres.
- There may not be a need for the number of offices that we have in a post covid-19 world.
- There is no need for new offices in the north-west of the borough.

In addition:

- Need to explicitly reference the opportunity areas as suitable locations for out of town office development, as per the existing site allocations
- New offices should only be supported where the Council is satisfied they will not harm the amity of those living nearby.
- Reference should be made to the dangers of the commercialisation of public spaces.

Other options suggested did not necessarily relate to the town centre first issue. These included:

- The need to introduce empty retail property orders/ otherwise work with property owners to allow the Council to take over vacant units and let to pop up and start ups.
- Need to reduce traffic congestion in our centres
- Support for food courts.
- Reducing business rates would be helpful.

- Need to support diverse set of uses in our town centres, including sports and leisure uses as well as a cultural and entertainment uses.
- Need to recognise the role of town centres as hubs to meet medical and other day-to-day needs.
- Need to work with residents and stakeholders to revitalise our shops and markets

Q 8.3 and 8.4 Mix of uses in our centres

Comments from 31 stakeholders were received.

12 stakeholders supported option 1, or to use conditions to restrict uses within new planning applications. The use of conditions would allow the Council to mitigate some of the more undesirable implications of the liberalisation of the use classes order and would help maintain the diversity of uses so valued in our town centres,

13 stakeholders supported option 2, are a policy to set out where pubs and takeaways may be appropriate. Many gave no reasons for their support, but those who did noted that resisting the creation of new hot food takeaways and bars could help protect the amenity of those who live near, or within our town centres; and that licencing alone will not mitigate impact.

12 stakeholders took this view that we should follow option 3 or "embrace the changes". These included some of the larger landowners in the borough. Comments included:

- Introducing restrictions was seen as going against the intentions of the government and reducing the flexibility which is so central to supporting vital and vibrant town centres.
- Use of conditions will unfairly disadvantage new developments.
- Need to be pragmatic in uncertain times and that the Council must let go of its traditional controls.
- The licencing regime was the most appropriate way to ensure that impact of potential "un-neighbourly" uses could have upon the amenity of those who live in the vicinity.

Q 8.5 Article 4 direction

28 stakeholders responded.

The large majority (24) supported the Council in making an Article 4 direction. Most of these also supported the Article 4 direction covering the entire borough. Where reasons were give, this included:

- Need to protect sports facilities from loss to residential.

- Particular support for A4D in our town centres, with a concern that Local centres may be under particular pressure.
- Unrestricted loss to residential may cause pressure on theatres and other existing entertainment uses as "agents of change".
- One consultee would support the A4D if the planning policies were sufficiently flexible to allow loss of offices when no longer required.

4 stakeholders did not support an Article 4 direction as it:

- Runs counter to the Government ambition to increase the supply of homes.
- Can stifle innovation.
- Does not recognise the contribution that new homes within a town centre can have upon the viability of that centre.

In addition another stakeholder supported the loss of offices in otherwise residential areas, with another suggesting that we should be promoting the commercial environment to support the retention of offices, rather than resisting their loss.

The St Quintin and Woodland's Neighbourhood Forum object to the making of the A4D for the SQW neighbourhood area, as are not satisfied that Latimer Road is a viable office location. They have made a detailed representation to the Article 4 consultation itself.

Issue 2: The future nature of our town centres

Q 8.7:   Do you support any of the suggested strategies for our town centres.

Q 8.8:   Do you have any other options to suggest?

Comments from 26 stakeholders were received. Whilst the large majority were supportive of the proposed visions for the centres, a number of additional comments were received. Only one consultee rejected the idea of the Council setting out visions for the centres, suggesting that market should be left to decide the future nature of our centres. A number of comments were received on the following centres:

Kings Road

- Importance of cultural and architectural heritage should be emphasised.
- Use planning powers to support small independents rather than chain stores.
- Need to reflect activities and events and the activation of public spaces.

Portobello

- Need to reflect results of the market consultation.
- Need to enhance street frontages and market.
- Improve linkages with Ladbroke Grove.
- Support more diversification of uses to maintain the vitality of the centre.

Notting Hill Gate

- Need to reflect key role as a local service centre rather than as centre for arts and cultural uses.
- The centre is not an appropriate location for the night-time economy.

Kensington High St

- The High Street is no longer an attractive destination for shoppers, and a "rethink" is required. Promote the role of the Design museum.
- Any strategy must reflect its wider role, and not merely as a cultural destination.
- The importance of offices within the centre should be noted.

South Kensington

- A number of consultees (4 residents and amenity groups) took the view that any vision needs to reflect the important role of the centre as a service centre for nearby residents, and that the needs of residents and visitors needs to be "re-balanced."
- The centre is not a cultural location, but as a service centre for nearby residents.
- Need to discourage additional restaurants and food outlets.
- Role as a centre for education should be recognised.
- The cultural institutions were more supportive and wish the centres to build upon its strength as world class destination.

Earl's Court

- Earl's Court should be recognised as a town centre with its own vision.
- It is an appropriate location for a BID.
- The Council should support pop-ups and match funding for shopfront improvements across the centre.

General

- Need to recognise local role of district centres.
- Need night-time wardens to stop noise and nuisance and assist existing enforcement.
- Need to balance uses as in past.
- Heritage to take a strong role in future identity of our centres..
- Need to support food uses across our centres – as likely to have rapid growth and can make a contribution to their vitality.
- Need to control licencing to better control noise and smells.
- Opportunity Areas will become part of the network of centres and will need their own visions. For the Earl's Court OA this should reflect workplace, cultural and other town centre uses and the creation of a new sustainable urban quarter.

Q.8.9. Are any areas or parades which should be added to, or removed from an existing centre? Please be specific and explain why.

A number of specific sites/ parades have been included.   A more general point raised includes the need to include those commercial units on the "returns" of existing centres, within the town centres.

9. Business and Culture

Q 9.1:   The provision of offices. Which of these options do you support?

Responses were received from 38 consultees.

12 consultees supported, option 1, the protection of all offices across the borough. The following reasons were given:

- Offices are critical to the creation and retention of mixed and balanced communities and should be protected unless it is successfully demonstrated that they have no long term future
- Offices are of particular value within our town centres.
- Protection will help maintain the diversity of uses so important to maintaining the character of the borough.

Imperial collages supported the option in principle, but not for its own estate.

6 consultees supported the loss of offices in certain circumstances.

- 4 consultees states that the Council should allow loss of an office to residential, when in a property originally built as residential.
- The SQWNP stated that they should be released in the Latimer Road area, as this was no longer a viable office location. This area should be removed from the Latimer Road Employment Zone designation.
- Protection runs counter to Governments ambition to promote mixed use development and contrary to the flexibility inherent within class E.
- Offices should not be prioritised over housing, and the Council need to recognise that demand for offices is not evenly distributed across the borough

4 consultees supported option 3, or the loss of offices to certain named uses. These included when the loss was to voluntary service organisations, healthcare and community uses.

Just 4 consultees responded to option 4, or whether the Council should requires business led development within the Employment Zones.

- The SQWNP, supported flexibility of uses in the Employment Zones.
- Two consultees sought to resist any new housing in Employment Zones, as were of the view that this dilutes their function.

- A major landowner noted that the Council should require retention of existing floorspace in an Employment Zone, rather than require an uplift and needs to recognises that new development will require substantial elements of new housing if it is to be viable.

9 consultees supported option 5, the making of a borough-wide article 4 direction.

In addition the following general points were made:

- The Council needs to take a "total review" as the approach that the Council has taken is now out of date
- Need to promote makerspaces in our town centres and support different forms of affordable/ cross subsidises work-spaces across the borough.

Q 9.2:   Do you have any other options to suggest?

The following suggestions were made:

- Council to own an run a series of local shared office spaces.
- Support for flexible/ affordable workspaces for small start-ups.
- Need for Lots Road SPD, with a priority to resist new housing in the Lots Road Employment Zone.
- Need to review town centre boundaries and ensure that added to existing conservation areas.
- Need for affordable workspaces in Earl's Court and West Kensington OA.

Issue 2: Light industrial uses

Comments were received from 26 consultees, who were almost unanimous in their support for light industrial use across the borough. The majority did not add any additional comments. Only a single objection was made.

18 stakeholders supported option1, or to promote light industrial uses within larger commercial developments.

- Need to have agent of change principle in mind – light industrial uses need to be comparable with neighbouring residential uses. It may be that light, rather than general industrial uses, may be appropriate.
- Need to reflect that B8 warehousing uses may also be appropriate
- Need to ensure that the diversity of business uses in our Employment Zones is maintained.
- Other consultees also noted the need for new start-up spaces.

Option 2: Resist the loss of light industrial uses to residential

17 stakeholders supported option 2, or the general protections of light industrial uses (to residential). This included the GLA. In addition, the following issues were raised:

- Need some flexibility to ensure light industrial uses are only protected where viable.
- Need to protect across the borough. This may include in side streets or within mews.
- The general need for need for last mile distribution and logistics in an edge of centre borough such as ours.

Issue 3: Affordable workspaces

Q 9.5:

Option 1: Affordable workspaces to be provided as part of new large scale commercial proposals?

Option 2: What model of affordable workspace?

Option 3: No requirement for formally discounted space?

Which of these options you support?

Comments were received from 17 consultees, the majority of whom (11) supported option 1, or a requirement that affordable workspaces are provided as part of new large scale commercial proposals. Some of those who supported the principle of the provision of affordable workspaces did note that viability and affordability must be taken into account so that it does not to jeopardise the delivery of commercial proposals.

Few comments were received regarding the appropriate model.

One stakeholder noted that this should be decided through a workspace strategy. With another seeking maximum flexibility.

6 stakeholders took the view that there should be no requirements for formally discounted space.

- The strength of demand for employment floorspace in the Borough is not sufficient to place an additional burden of discounted workspace accommodation.
- Council should not be in the business of providing workspaces – other than those already within our portfolio
- Support provision of workspaces, but it should not be a requirement. Developers should provide affordable workspaces as they see fit.
- Need opportunities for off-site provision.

Q 9.6:   Do you have any other options to suggest?

The following comments were received.

- Support for temporary start ups an pop-ups
- Let the market decide on the nature of the commercial space being provided.
- Support live/work units
- Subsidy required for affordable workspaces
- The Local Plan should acknowledge the potential for a significant employment offer at Earls Court.

Issue 4: Hotels/visitor accommodation

Q.9.7. Which of these options do you support? You can pick more than one.

Option 1: protect hotel rooms

3 stakeholders took this view that the Council should protect all hotels and hotel rooms across the borough.

- Better enforcement of air B and B type accommodation needed.
- Retention of hotels will mean that visitors will not be forced to use Air BnB type lettings, a form of unregulated accommodation which causes problems to residents.
- Need to protect hotels in Earl's Court. Required for forthcoming multi-purpose venue on the Earl's Court OA site.

Option 2: Allow loss of hotels in Earl's Court Ward

12 stakeholders supported the loss of hotels in the Earl's Court ward.

- There is an oversupply of hotel provision in Earl's Court
- Support loss in Courtfield and Abingdon as well as Earl's Court wards
- No new hotels to be supported I Earl's Court Ward

Others look a wider view, that:

- There is a need to protect in key locations as visitor accommodation is key to the visitor economy. Loss on those areas where will not undermine the visitor economy will be supported. This may include Earls' Court, but also other (non specified) areas.
- Support loss of low quality hotels across the borough.
- Should only be lost where compelling evidence on non-viability is provided.

9 stakeholders supported the diversification of the hotel sector as the market dictates.

However, 3 of those who supported this option were of the view that serviced apartments need continued monitoring and controls/ should be resisted.

Only one consultee explicitly supported the expansion of the STL sector.

10. Social and Community Uses

Issue 1: Types of social and community use

Q 10.1:   Which of these options do you support? You can pick more than one.

Comments were received from 31 consultees. Overall respondents were supportive of all three options, with 18 consultees in favour of Option 1 (add separate category of cultural uses), 15 in favour of Option 2 (include river-based facilities as part of sport facilities definition) and 17 in favour of Option 3 (add a separate category of parks and open spaces).

Regarding the category of cultural uses, it was suggested to expand the definition by including auction houses, exhibition spaces, cinemas and studios.

Other more general comments were received which can be categorised as follow:

- A separate category of cultural uses is welcomed as long as Policy CF7 continues to apply, including a sequential approach (CF7c).
- Historic England noted that as many of the cultural uses are located in heritage buildings (and in many cases these are the original uses that these buildings were designed for), there is an opportunity to draw out the overlap with the social and community uses of buildings and landscapes when considering the broader positive strategy for the Royal Borough's historic environment.

Q 10.2:   Do you have any other options to suggest?

Comments were received from 20 consultees, although not many alternative options were suggested.

7 respondents highlighted the importance of community halls / meeting rooms / community spaces and their contribution to local community. It was suggested to widen and clarify "other valued uses" definition and include those uses.

It was also suggested that "Education uses" should include student halls of residence, which are directly related to specified academic institutions, especially if they provide meals.

One comment suggested that pubs should be recognised separately.

Issue 2: The protection of social and community uses

Q 10.3: Which of these options do you support? You can pick more than one.

Comments were received from 28 consultees, the majority of which (13) called for retaining our existing sequential approach in Policy CK1. Six consultees expressed in favour of Option 2 and 8 in favour of Option 3.

However, a small number of comments were not supportive of Options 2 and 3 (4). Concerns were raised that these two options are potentially too permissive and afford scope for manipulation and unintended consequences. One respondent also noted that allowing for the loss of social and community uses in order to bring forward "other valued uses" does not necessarily constitute sustainable development if it results in the loss of a valued facility which then causes harm to the wellbeing of users.

On the other hand, respondents in favour of Options 2 and 3 noted that they allow a more appropriate degree of flexibility than Option 1, specifically referring to Policy S1 (g, f) of the London Plan and suggesting that any new Policy in Local Plan should align with London Plan. This Policy allows for the loss of social and community infrastructure even in areas with defined need in two circumstances:

1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community,

2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

Q 10.4: Do you have any other options to suggest?

Comments were received from 18 consultees, although only couple of additional options were suggested, these can be summarised as follow:

- Further protection of existing social and community uses is required especially in light of new permitted development rights from Class E to Residential.
- The Council's policy should be more than a presumption against such loss but an absolute preclusion of it.

On a more general note, comments highlighted the need to protect low-value social and community uses from high-value uses such as market housing. It

is feared that if left to the market, all non-residential uses, and particularly social and community uses, would rapidly be converted to high-value housing. At the same time, buildings classified as being of Community Value or assets becoming too expensive to save by the community and thus there are very limited resources to save those assets when required.

Issue 3: The need for new social and community uses

Q 10.5:   Do you support the option proposed?

Comments from 30 respondents were received, the majority of which (17) were in favour of the proposed Option to require developments to make a planning contribution towards creation of new social and community infrastructure based on the IDP and, where appropriate, a local needs assessment.

One comment noted that this approach should be applied only to large development but not for small schemes as this would be disproportionate and disincentive to development.

On a more general note, one respondent suggested that the provision of new social and community spaces which are part of the development schemes should be of adequate design quality and quantum.

Q 10.6:   Do you have any other options to suggest?

Comments from 14 respondents were received. 3 respondents highlighted the need to provide more health, mobility, and well-being services in Community premises for elderly, disabled, chair-bound and isolated single-person households. One comment also suggested that there is need to provide more creches and nurseries with outdoor play space in order to support the younger generation and to enable young parents to train and take up paid work.

One comment also noted that strategies for social infrastructure should be integrated with efforts to deliver accessible/walkable/sustainable neighbourhoods.

On another note, one respondent encouraged Council to apply its Policy more strictly, especially in relation to play space provision in new developments and to not accept developers' argument that the families are not their target audience and thus play space provision is not required.

11. Transport

Issue 1: Increasing active travel

Q 11.1:   Do you support this option?

Comments were received from 31 consultees, the majority of which (24) were in favour of this option to require new street to be laid out such that they preclude through traffic while being fully permeable to active modes of travel. Three responses explicitly opposed this Option whilst several respondents, including some of those offering support, urged caution to ensure that appropriate levels of access are afforded to those with specific mobility needs, for servicing, as well as for emergency vehicles and public transport where necessary.

Q 11.2:   Do you have any other options to suggest?

Comments from 20 respondents were received, which are summarised below:

The continued need to secure improvement to and reduce barriers on existing footways.

A continued need to provide high quality cycle parking in new developments and improve permeability and links for walking and cycling through new development.

Support for continued promotion of access to local waterways for walking and cycling.

Ensuring new development is well connected with access to a range of local amenities and facilities.

On a more general note regarding improving the walking environment, several comments mentioned the issues of conflict between pedestrians and those using electric scooters and bicycles illegally on footways as a deterrent to walking.

Q 11.3: Which of these options do you support? You can pick more than one.

Comments were received from 26 consultees with 11 expressing direct support for Option 1, a requirement for off-street parking to be restricted in new development to blue badge parking only. Two responses raised concerns with Option 1 in respect of reducing viability and resulting in new development being less attractive to potential occupants in the absence of parking opportunities. One comment considered that parking should be provided for all family-sized units.

The majority of responses (19) supported Option 2 which requires the provision of dedicated floorspace to facilitate on-site consolidation of deliveries across a development. Some of those who supported this principle note that this must be proportionate to the scale and type of development to avoid impacting upon viability of proposals and inefficient allocation of floorspace space. Once comment considered that Car free development would be beneficial in constraining property prices for those who do not seek to own a car and raised concerns over the provision of car par parking in larger development sites increasing car dependence.

Q 11.4: Do you have any other options to suggest?

Comments from 11 respondents were received, which are summarised below:

Better management of red routes including removal of Earl's court one-way system.

Improved management of deliveries including requirements for last mile delivery consolidations and continued requirement for off-street servicing for larger developments.

The need to focus on reducing car use rather than over promotion of EVs.

Issue 3: Pollution

Q 11.5: Which of these options do you support? You can pick more than one.

26 responses were received on this issue with 16 consultees supporting Option 1, to require electric vehicle charging points on streets within new development. Several comments from those supporting the principle of this option noted that few opportunities exist in most areas of the borough to provide new streets.

17 consultees supported option 2 to require rapid EV charging points in major development where off-street servicing facilities are provided. Several comments noted this would only be acceptable where they are provided off-street.

16 Consultees supported Option 3 to require all parking spaces provided off-street to be equipped with active EV charging points. Several responses highlighted their desire to see car free developments and urged caution against promoting Electric vehicles as a sole solution to pollution issues. Other responses sought a lower provision of active charging points in line with current London Plan standards.

Q 11.6: Do you have any other options to suggest?

Comments from 8 respondents were received, which are summarised below:

Need to improve existing network of on-street charging infrastructure for existing streets.

The need to focus on reducing car use rather than over promotion of EVs.

Issue 4: Improving access to public transport

Q 11.7: Which of these options do you support? You can pick more than one.

20 responses were received on this issue with 9 consultees supporting Option 1, to continue to focus development contributions in respect of public transport on improving bus services, removing the current bias in favour of North/South routes. A number of responses explicitly supported the need for increased flexibility in how development contributions are assigned.

7 consultees supported Option 2, which seeks to maintain existing policy support for the delivery of a new station on the West London Line despite challenges relating to deliverability'. Several responses highlighted the need to deliver improvements to rail infrastructure and improve connections in the North West of the Borough. Comments from TFL do not support this option and do not consider that a viable business case exists for the delivery of a new station.

14 responses were received on this issue supporting Option 3, to Continue to support the delivery of Step free access at London Underground and rail stations across the Borough where new development presents such opportunities, prioritising funding for those stations where the greatest impacts can be realised. Several comments highlight the need to secure improved infrastructure at Earl's Court and West Brompton to support any forthcoming development at the Earl's Court Opportunity Area including relevant landowners.

Q 11.8: Do you have any other options to suggest?

Comments from 8 respondents were received, which are summarised below:

Desire for improvements to pedestrian environment to encourage walking over other transport modes

Need to ensure appropriate weight is given to delivery of Step free in determining planning applications

A general desire to see improvements to Rail, underground and bus infrastructure.

12. Streets, Parks and Outdoor Spaces

Issue 1: Parks and play space

Q 12.1:   Do you support this option?

Comments from 30 respondents were received, the majority of which (12) in favour of the proposed option to continue the current approach regarding new play space provision.

However, a small number of consultees (4) explicitly opposed payments in lieu approach arguing that it does not contribute to the sense of wellbeing and leads to over-dependence on existing play spaces, parks and other open spaces, which are already reaching their capacity and can be very crowded on occasions. 2 comments were of the view that play space should be provided on every scheme, regardless of the scale of development, whereas one respondent noted that on-site provision should be compulsory only for larger schemes over 10 units.

It was also noted that parks have several functions that should be equally protected (such as play spaces and tranquil spaces) and that ideally no function should be compromised at the expense of the other.

2 respondents raised concerns that current policy does not appear to have produced any significant additional play provision and that, in many cases, recent developments did not meet the required play space provision standards.

Q 12.2:   Do you have any other options to suggest?

Comments from 18 respondents were received, which can be summarised as follows:

- Suggestion to strengthen the Policy CR5 in regard to the safeguarding of communal spaces (communal gardens facing rears of the properties) and prevention of negative effects development can cause due to light-pollution, overshadowing or loss of privacy.
- Support temporary proposals that create spaces for people to play or bring greenery into the urban environment, especially on Earl's Court site.
- On a more general note regarding open space provision, it was suggested that new developments must provide adequate open space as per London Plan Policy.

- Suggestion to incorporate more nature into play space provision to encourage interaction with and learning about the natural environment.

Designation of Cremorne Wharf as meanwhile green space

Option to designate Cremorne Wharf as a meanwhile green space was offered in Issue 7: Waste management.

A total of 13 expressed support for a meanwhile open space (Strategic Waste Management Option 2). Support for this Option was from 5 Residents' Associations, 4 residents, 3 councillors, 2 local businesses and the PLA.

A number of comments were received to Strategic Waste Management Option 2. One resident objected to using Cremorne Wharf for future waste management purposes due to associated noise and odour concerns, another questioned whether it was viable to propose a meanwhile use if the site is a safeguarded wharf and could be used for waste management purposes at any time in the future. A Residents' Association also questioned what would happen to the meanwhile use if a proposal came forward at the wharf.

The GLA and PLA do not object to a meanwhile open space subject to the Council actively promoting Cremorne Wharf for water-borne freight handling and waste handling use. The GLA highlighted that the waste uses should be prioritised above other uses. Thames Water highlighted that part of the site would need to be retained as operational land for Thames Tideway Tunnel.

13. Conservation and Design

Issue 1: Building heights

Q 13.1: **Which option do you support for the definition of what is a tall building within the borough, and where they should be located?**

33 comments were received from stakeholders. The comments are split between those who feel the London Plan definition of tall building would be suitable for the whole borough and those who think that it makes sense to pursue a borough specific definition that is based on the variety of built form that characterises it.

- The majority of responses in support of retaining the London Plan definition for the whole borough (option 1) do it because it is likely to be more restrictive and help avoid tall buildings that may affect negatively on the quality of the built environment. This option is largely supported by resident organisations and individuals.
- The majority of responses in support for option 2 accept that there are areas of the borough where it would make sense to have a higher threshold before Policy D9 is triggered. This option is largely supported by developers and other organisations such as HE and the museums.
- 2 respondents suggested this is an opportunity to relax the borough's stance on tall building developments on key areas as per option 3 below.

Responses to where tall buildings could be located

Responses on this were very varied. Whilst a number of respondents, including some residents, agreed Opportunity Areas are suitable for tall buildings, others felt no new tall buildings should be allowed in the borough, especially within and around conservation areas.

- A number of respondents agreed if a location is to be defined as suitable for tall buildings, it should be limited to Opportunity areas as it clarifies the council's position
- A majority of responses supported option 3 (allowing tall buildings where redevelopment of existing tall buildings takes place) as it would mean no new tall buildings would be allowed within the borough
- Option 2 (including site allocations as tall building locations) had less support and most of those opposing this option focused on a particular allocated site only
- There was one response suggesting CL12 is retained as is, and a second one advocating for generally allowing tall buildings in the areas identified as 'clusters'.

Issue 2: Design quality, character and growth

Q 11.3: Which option do you support for the development and use of Design Codes within the borough?

32 stakeholder responses were received. A majority of respondents preferred option 2 as it would be more fitting to the varied townscape in the borough.

- Many responses expressed concern with how option 1 may work given the great variety of character within the borough, so this option had little support. One response in favour of this option justified it on the grounds it would be a high level guidance and therefore flexible.
- Most responses were in support for option 2, which would allow for more specific guidance for sites and specific areas within the borough. Residents who have been involved in the development of the Latimer Road Design Code highlighted the significant time and effort required to produce a design code and if therefore questioned if it is realistic to expect similar documents to be produced for many sites.
- Those supporting option 3 were generally concerned about design codes stifling creativity and limiting flexibility in the design process, citing existing policies are adequate already.

Additionally, suggestions were made to add weight to sustainable design within codes.

14. Integrated Impact Assessment

Q 14.1: We have produced an IIA Scoping Report published alongside this consultation. The IIA objectives have been considered around the three key elements of sustainability. Please have a look and give us your views.

30 responses were received from stakeholders in which no issue was raised with the Council's IIA Scoping Report. However, TfL suggested that the transport objective of the IIA framework be more strongly worded. In addition, Historic England noted their concern that the IIA objectives appeared to lack reference to heritage.