



**New Local Plan Review – Regulation 19
Policy Formulation Report – October 2022
Site Allocations (SA3 – SA16)**



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

CONTENTS

1	Introduction	4
1.1	New Local Plan Review	4
1.2	Site allocations	4
2	Legislation, policy and guidance context	5
2.1	National	5
2.2	Regional	10
2.3	Neighbourhood	15
2.4	Local	15
3	Evidence	17
3.2	SHLAA 2017	17
3.3	Site Allocations Paper	18
3.4	Employment Land Study (ELS)	18
3.5	Retail and Leisure Needs Assessment (RLNA)	20
3.6	The Character Study	22
3.7	Heritage Impact Assessments	22
3.8	Flood Risk Sequential Test	23
3.9	The Local Plan Viability Study	23
3.10	The Integrated Impact Assessment (IIA)	24
3.11	Infrastructure Delivery Plan (IDP)	24
4	General Principles	25
4.1	Compliance with all other policies in Local Plan	25
5	Large Sites	26
5.1	100/100A West Cromwell Road	26
5.2	Former Territorial Army Site, 245 Warwick Road	31
5.3	Wornington Green, Phase 3	34
5.4	Lots Road South	39
5.5	Edenham Way	44
5.6	Chelsea Farmer's Market	48
5.7	Units 1-14 Latimer Road industrial Estate	51
5.8	Newcombe House	53
5.9	The Plaza, 535 King's Road	57

6	Small Sites.....	60
6.1	Harrington Road Car Park	60
6.2	Emmanuel Kaye Building.....	62
6.3	142A Highlever Road.....	64
6.4	Colebrook Court.....	65
6.5	Holland Road Triangle	67
7	Options, consultation and Integrated Impact Assessment	70
7.2	Proposals Map.....	71
8	Duty to cooperate and strategic issues	72
	Appendix A – Calculated need for medical facility floorspace for SA10 Newcombe House	74

1 INTRODUCTION

1.1 NEW LOCAL PLAN REVIEW

- 1.1.1 The Royal Borough of Kensington and Chelsea is undertaking New Local Plan Review (NLPR) to ensure we have an up-to-date and fit-for-purpose Local Plan to guide the development of the Borough and reflect our values.
- 1.1.2 This Policy Formulation Report has been written to explain the reasoning behind the sites allocations. This section of the emerging plan identifies sites to support good growth in the Borough.
- 1.1.3 This report covers large and small site allocations only. Given the scale of the development, separate Policy Formulation Reports (PFRs) have been prepared for the Opportunity Area sites - Kensal Canalside and Earl's Court.

1.2 SITE ALLOCATIONS

- 1.2.1 This topic of the NLPR relates primarily to the following chapters and policies of the existing Local Plan 2019:

- **Chapter 6: Golborne**

Policy CA2: Wornington Green

Policy CA3: Land adjacent to Trellick Tower

- **Chapter 7: Latimer**

- **Chapter 8: Earl's Court**

Policy CA5: Warwick Road Sites (100/100A West Cromwell Road Site)

- **Chapter 9: Lots Road/World's End**

Policy CA6: Lots Road Power Station

Policy CA7: Site at Lots Road

- **Chapter 11: Notting Hill Gate**

- **Chapter 14: South Kensington**

Policy CA8: Harrington Road

- **Chapter 15: Sloane Square/King's Road**

Policy CA9: Chelsea Farmer's Market

2 LEGISLATION, POLICY AND GUIDANCE CONTEXT

2.1 NATIONAL

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2021

- 2.1.1 The NPPF provides the overarching guidance in preparing Local Plans.
- 2.1.2 Paragraph 20 of the NPPF states that “*strategic policies should set out an overall strategy for the pattern, scale and design quality of places*” and make sufficient provision for a variety of uses, including housing, employment, retail, leisure and other commercial development (subsection a), as well as community facilities (subsection c).
- 2.1.3 Paragraph 23 further states that “*broad locations for development should be indicated on a key diagram, and **land-use designations and allocations identified on a policies map**. Strategic policies should provide a clear strategy for bringing sufficient land forwards, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. **This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area** (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)” (emphasis added).*
- 2.1.4 Section 5 of the NPPF is entitled “delivering a sufficient supply of homes”. Paragraph 60 of the NPPF establishes the Government’s objective of “*significantly boosting the supply of homes.*” To achieve this objective, “*it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.*”
- 2.1.5 A first step towards this is “*to determine the minimum number of homes needed*” as required by Paragraph 61 of the NPPF. The strategic policies determining the number of homes needed “*should be informed by a local housing need¹ assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.*”

¹ Local housing need is defined in the NPPF Annex 2: Glossary as “*The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 [...]).*”

- 2.1.6 Further to that, Paragraph 66 of the NPPF states that *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations². Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”*
- 2.1.7 Under the NPPF sub-section titled ‘Identifying land for homes’ paragraph 68 states that *“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a) specific, deliverable sites for years one to five of the plan period³; and*
 - b) specific, developable sites or broad locations for growth, for years 6-10, and where possible, for years 11-15 of the plan.”*

² Footnote 32 *Except where a Mayoral, combined authority or high-level joint plan is being prepared as a framework for strategic policies at the individual local authority level; in which case it may be most appropriate for the local authority plans to provide the requirement figure.*

³ Footnote 34 *With an appropriate buffer, as set out in paragraph 74. See Glossary for definitions of deliverable and developable.*

2.1.8 The definitions of deliverable and developable sites are set out in Annex 2: Glossary of the NPPF:

*“**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

*“**Developable:** To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site will be available and could be viably developed at the point envisaged.”*

2.1.9 Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. As such, local planning authorities should identify through their development plan and brownfield registers land to accommodate at least 10% of their housing requirements on sites no larger than one hectare. They should also support the development of windfall sites through policies and decisions.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG)

- 2.1.10 The NPPG on [Plan Making](#) (paragraph 2) states that “*where sites are proposed for allocation, **sufficient detail should be given** to provide clarity to developers, local communities and other interested parties **about the nature and scale of development**” (emphasis added).*
- 2.1.11 The NPPG on [Housing and economic land availability assessments](#) sets out a step by step methodology for undertaking such assessments. While a Strategic Housing Land Availability Assessment (SHLAA) is undertaken on a pan London basis by the Mayor of London, stages 1 and 2 of the methodology are relevant to the Council’s site allocations.
- 2.1.12 Stage 1 consists of identification of sites and broad locations. Sites selected for the assessment should be within the plan-making area (paragraph 6).
- 2.1.13 Paragraph 8 states that “*the assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.*”
- 2.1.14 In regard to sizes of sites that can be considered for assessment, paragraph 9 of the guidance states that “*Plan-makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. It may be appropriate to consider all sites and broad locations **capable of delivering 5 or more dwellings**, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above.*”
- 2.1.15 When identifying the potential sites, “*plan makers should consider all available types of sites and sources of data that may be relevant in the assessment process*” (paragraph 11). The guidance also highlights the importance of issuing call for sites to ensure the transparency of the process and to identify as many potential sites as possible (paragraph 12).
- 2.1.16 Stage 2 of the assessment methodology consists of estimating the development potential of each site. “*The estimation of the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density. When assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the National Planning Policy Framework. Development potential is a significant factor that affects the economic viability of a site / broad location and its suitability for a particular use. Therefore, assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential*” (paragraph 16).

2.1.17 Further to that, *“plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period”* (paragraph 17).

2.1.18 When assessing suitability of sites for development, sites should be **“considered against relevant constraints and their potential to be mitigated.”**

When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:

- *national policy;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation”* (paragraph 18).

2.1.19 Factors that can be considered **when assessing availability of the potential sites** are outlined in the paragraph 19 of the guidance:

“A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.”

2.1.20 Factors that should be considered **when assessing achievability of the potential sites** are outlined in the paragraph 20 of the guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”

2.1.21 The NPPG on [Effective Use of Land](#) sets out guidance on making effective use of land, including planning for higher density development. In regard to existing sites allocations, paragraph 1 of NPPG sets out some of the factors that may be relevant to consider when determining whether land should be reallocated for a more deliverable use. These factors could be:

- *“the length of time since the site was allocated in the development plan;*
- *the planning history of the site including any planning applications or pre-application enquiries;*
- *whether there is evidence that the site has been actively marketed for its intended use for a reasonable period, and at a realistic price; and*
- *whether there are any changes of circumstance that mean that take-up of the site for its intended use is now unlikely.*

Where an alternative use for the allocated site is proposed, it will also be relevant to consider the extent to which evidence suggests the alternative use would address an unmet need, as well as the implications for the wider planning strategy for the area and other development plan policies.”

2.2 REGIONAL

THE LONDON PLAN 2021

2.2.1 The London Plan’s housing policy area is informed by the Good Growth objective “Delivering the homes Londoners need” set out below. Policy GG4 Part A and D is relevant to the issue of allocating sites for housing.

GG4 Delivering the homes Londoners need

To create a housing market that works better for all Londoners, those involved in planning and development must:

- A ensure that more homes are delivered
- D identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset

Housing target

- 2.2.2 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. Because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver the housing targets in the New London Plan which have been informed by the SHLAA and the SHMA.
- 2.2.3 London Plan Policy H1 Increasing housing supply Part A sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents. **Kensington and Chelsea's ten-year housing target is set at 4,480 between 2019/20 to 2028/29.**
- 2.2.4 London Plan Policy H1 Increasing housing supply Part B 1) requires borough to prepare "delivery-focused" Development Plans which means that they should:
- "a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification***
- b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2*
- c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA."*
- 2.2.5 Part B 2) of the Policy requires boroughs to *"optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:*
- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary*
- b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets*
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses*
- d) the redevelopment of surplus utilities and public sector owned sites*
- e) small sites (see Policy H2 Small sites)*
- f) industrial sites that have been identified through the processes set out in Policy E4, E5, E6 and E7".*

- 2.2.6 Part B 3) of the Policy seeks to incentivise build-out milestones to help ensure homes are built quickly.
- 2.2.7 London Plan Policy H2 Small Sites Part B 3) requires borough to “**identify and allocate appropriate small sites for residential development**” and to list these small sites on the brownfield register. It is also expected that site-specific briefs, masterplans and housing design codes should be prepared where appropriate.

Optimising site capacity

- 2.2.8 The London Plan’s site optimisation policy area is informed by the Good Growth objective “Making the best use of land” set out below. Part A, B, C and D is relevant to the issue of site allocations and Opportunity Areas.

GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- A** enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites
- B** prioritise sites which are well-connected by existing or planned public transport
- C** proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- D** applying a design-led approach to determine the optimum development capacity of sites

- 2.2.9 London Plan Policy D1 London’s form, character and capacity for growth Part B is relevant to the capacity of site allocations. It sets out the steps for establishing the capacity for growth of different areas, including developing to an optimum capacity by doing the following:

“1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and (B3) on London’s form, character and capacity for growth

2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and

3) following the design-led approach (set out in Policy D3) to establish optimised site capacities for site allocations. Boroughs are encouraged to set

out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.”

2.2.10 London Plan Policy D3 sets out the approach for optimising site capacity through the design-led approach. Part A of the Policy states *“All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.”*

2.2.11 [*A Draft London Plan Guidance on Optimising Site Capacity: A Design-led Approach*](#) is also available in a Draft Form. The guidance sets out how the design-led approach, set out in Policy D3 of the London Plan, should be applied. This approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design. It should be used to determine the most appropriate form of development on a site.

Commercial development

2.2.12 The London Plan’s economic policy area is informed by the Good Growth objective “Growing a good economy” set out below. GG5 Part C and D is relevant to the issue of allocating sites for employment and industrial uses, as well as affordable housing.

GG5 Growing a good economy

To conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

C plan for sufficient employment and industrial space in the right locations to support economic development and regeneration

D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth.

- 2.2.13 London Plan Policy SD7 Town centres: development principles and Development Plan Documents Part B 2) requires borough to support the town centres first approach through the Local Plan by **“allocating sites to accommodate identified need within town centres, considering site suitability, availability and viability, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). If suitable and viable town centre sites are not available, boroughs should allocate appropriate edge-of-centre sites that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport”**.
- 2.2.14 London Plan Policy E9 Retail, markets and hot food takeaways Part B 3) requires borough to **“set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units”**.

Tall buildings

- 2.2.15 London Plan Policy D9 Tall Buildings Part A requires borough to **“define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey”**.
- 2.2.16 Part B of the Policy D9 further requires borough to **“determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations”**. Part B(2) of the Policy requires borough to identify **“any such locations and appropriate tall building heights”** on maps in Development Plan. Part B(3) of the Policy further states that **“tall buildings should only be developed in locations that are identified as suitable in Development Plans”**.

2.3 NEIGHBOURHOOD

ST QUINTIN AND WOODLANDS NEIGHBOURHOOD PLAN

- 2.3.1 The St Quintin and Woodlands Neighbourhood Plan⁴ forms part of our development plan. Policy H of the Plan seeks to allocate the land for housing at two sites:

Housing

H 1) To allocate for housing use the land at 142A Highlever Road

H 2) To allocate the sites occupied by Units 1-14 Latimer Road for mixed use development, allowing housing use (C3) subject to ground and mezzanine floors remaining in commercial use (B1, B8, A or D class).

- 2.3.2 In addition, site at 2-5 Crowthorne Road has been identified as a potential allocation capable of delivering 15-20 housing units. However, the site has not been formally allocated and no specific site allocation policy exists within the Neighbourhood Plan.

NORLAND NEIGHBOURHOOD PLAN

- 2.3.3 The Norland Neighbourhood Plan⁵ forms part of our development. The Plan does not allocate any sites for development.

2.4 LOCAL

EXISTING LOCAL PLAN POLICY

- 2.4.1 The existing Local Plan 2019 policies relating to large and small site allocations (excluding two Opportunity Areas) are:

Policy CA2: Wornington Green

Policy CA3: Land adjacent to Trellick Tower

Policy CA5: Warwick Road Sites

Policy CA6: Lots Road Power Station

Policy CA7: Site at Lots Road

Policy CA8: Harrington Road

Policy CA9: Chelsea Farmer's Market

⁴ SQWNF (2018), [St Quintin and Woodlands Neighbourhood Plan](#).

⁵ Norland Neighbourhood Forum (2013), [Norland Neighbourhood Plan](#).

SUMMARY

Date	Document	Organisation
Jul 2021	National Planning Policy Framework (NPPF)	MHCLG
Sep 2018 (updated)	National Planning Practice Guidance (NPPG): Plan-making	MHCLG
Mar 2014 (updated)	National Planning Practice Guidance (NPPG): Housing and economic land availability assessment	MHCLG
Jul 2019	National Planning Practice Guidance (NPPG): Effective use of land	MHCLG
Mar 2021	The London Plan	Mayor of London
Jul 2018	St Quintin and Woodlands Neighbourhood Plan	StQW Neighbourhood Forum
Dec 2013	Norland Neighbourhood Plan	Norland Neighbourhood Forum
Sep 2019	Local Plan	RBKC

3 EVIDENCE

3.1.1 The evidence presented in this section is relevant to all sites that have been allocated. In addition, there will be site specific evidence which is presented alongside each site in section 5 below.

3.2 SHLAA 2017

3.2.1 The London-wide Strategic Housing Land Availability Assessment (SHLAA)⁶, 2017 shows that there is capacity across London for approximately 40,000 new homes a year on large sites. The SHLAA also includes an assessment of small site⁷ capacity showing a capacity for development on small sites for 12,000 new homes a year across London. Boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. There is a policy focus on developing small sites for housing in the London Plan which is reflected by Policy H2 “Small sites”. **Kensington and Chelsea’s ten-year housing target for net housing completions on small sites is set at 1,290 between 2019-20 and 2028-29.** Although, paragraph 4.2.3 of the London Plan clarifies that *“the small sites are a component of, and not additional to, the overall targets.”*

3.2.2 All sites identified in the SHLAA were all considered for site allocation. Appendix E of SHLAA provides a list of large sites (with area of 0.25 ha or more) that have been identified as having approval (planning permission) for housing development. In Kensington and Chelsea, 16 sites were identified. However, all identified sites are either current site allocations, well advanced in the planning process or already complete. The list also included two sites - Saga Centre - 326 Kensal Road and 60-70 Sloane Avenue. The first of these is being implemented for commercial development, while the latter is also not coming forward for residential development.

3.2.3 In addition to the sites that have approval, Appendix F of the SHLAA provides a list of sites that have been identified as existing or emerging site allocations for housing or mixed-use development. In Kensington and Chelsea, only two sites were identified – Kensal Gasworks and Former Edenham Residential Home, both are existing site allocations that are carried forward in the NLPR.

3.2.4 To conclude, there are only four sites listed in the SHLAA that are all existing site allocations which are being carried forward in the NLPR for the reasons listed above.

⁶ Mayor of London, [The London Strategic Housing Land Availability Assessment 2017](#), November 2017.

⁷ Below 0.25 hectares in size.

3.3 SITE ALLOCATIONS PAPER

3.3.1 The Council's Site Allocations Paper⁸ explains the way in which sites have been selected for inclusion as sites allocations. This includes a staged site suitability assessment, including the following:

- Stage 1: Site eligibility and availability assessment
- Stage 2: Policy constraints assessment
- Stage 3: Site suitability and achievability assessment

3.3.2 The Council has undertaken a robust approach to allocating the sites and explored various sources including the two calls for sites and the Draft Policies (Regulation 18) consultation. Having followed the assessment criteria set out in the paper, 16 sites are being allocated in the NLPR.

3.3.3 Appendix A of the Site Allocations Paper contains detailed assessment of each site that was proposed through call for sites with reasons for omission in case if the site was not selected for allocation.

3.4 EMPLOYMENT LAND STUDY (ELS)

3.4.1 Icen Projects have prepared an Employment Land Study⁹ on behalf of the Council to help inform the NLPR.

3.4.2 The ELS considers the nature of the Borough's business market. Whilst not strategic in nature, in the way that the Isle of Dogs is, it is significant, employing an estimated 42,500 people, the largest industries being Financial and business services and Government services.

3.4.3 The office sector is vibrant, with very low (pre Covid-19) vacancy rates of just 2.2 per cent. At the time of the study, these had risen to 5.9 per cent but are expected to drop later in 2023. By the same token market rents expected to rebound post-Covid, with high levels of investor confidence with investment yields at 4.2 per cent. The health of the office market is not just associated in primary areas but remains robust across the borough.

3.4.4 A key part of the ELS is consideration of future need, and this relates to future supply. It does this for both office and for industrial uses.

⁸ RBKC, Sites Allocations Paper, October 2022.

⁹ RBKC, Employment Land Study, October 2021.

Office floorspace future needs

- 3.4.5 The ELS identifies based on employment forecasts *“the office requirements for the Borough to 2043 is 86,400 sqm. A sensitivity that assumes a 30% reduction in typical floorspace occupancy would require 60,500 sqm. Average net completions indicate a slight negative trend whereas gross completions projected forward equate to 113,000 sqm, higher than the labour demand model”* (paragraph 10.14).
- 3.4.6 Given some uncertainty on future office usage patterns given the Covid pandemic, the study recommended that **“a net increase of 60,500 sqm should be used for planning policy requirements but the market conditions should be revisited in the near term as the market stabilises post pandemic to test if a higher figure of 85,400 sqm is more appropriate”**. The ELS noted that *“much of the 64,000 sqm is already in the pipeline based on LDD extant permission and RBKC 2020/21 permissions, however, there is no certainty that this floorspace will be brought forward, furthermore losses can be expected if past trends are an indicator”* (paragraph 10.15).
- 3.4.7 The study continues **“Achieving additional floorspace should be sought primarily through encouraging existing commitments, intensifying existing sites and seeking office components in mixed use development. This is most likely to be achieved in areas performing well in market terms notably the commercial centres at Kings Road, Notting Hill, Kensington and Knightsbridge / South Kensington”** (paragraph 10.16).
- 3.4.8 “The evidence indicates that it is **important to seek to protect the existing office space in order to meet future needs**. Historic monitoring and VOA floorspace trends indicate that inevitably office space will be lost despite policy intent, and this is likely to continue, putting pressure on rents and vacancy. On this basis it is important to seek to retain the existing stock and encourage new floorspace to be brought forward” (paragraph 10.17).

Industrial floorspace future needs

- 3.4.9 In paragraph 10.18, the ELS recommends setting the industrial requirement as 9,000 sqm, based on employment forecasts and some further space to support an increase in the low vacancy rate. However, the ELS noted that it would be ambitious in policy and market terms to expect increases in stock due to viability compared with other uses however where possible this should be encouraged. The study recommended that redevelopment of existing sites for non-industrial space should be resisted.

3.5 RETAIL AND LEISURE NEEDS ASSESSMENT (RLNA)

Comparison goods floorspace future need

- 3.5.1 The RLNA¹⁰ considers the need for additional comparison goods floorspace over time, by sub area. The comparison goods assessment has assumed that the borough will maintain existing market share and the model has forecast the need for new comparison floorspace to the years 2026, 2031, 2041 and the end of the plan period or 2043.
- 3.5.2 The RLNA concludes that, “there is currently no need for additional comparison goods floorspace over the plan period” (Para 16.54). It goes on to note that, *“The reasons for this are consistent with identified national trends. Expenditure growth has been hit in the short to medium term as a consequence of Covid-19, SFT is substantially greater through accelerated trends, and the rate that existing floorspace is absorbing expenditure continues to remain strong (claiming a high proportion of expenditure growth). More locally, population growth in the borough is substantially more constrained than elsewhere in the sub-region.”*
- 3.5.3 By the same token, the level of “over supply” is extremely modest (just 1,095 sqm to 2043). The RLNA concludes in this regard that, *“the over-supply is not currently substantial, so that doesn’t raise a huge concern in the respect of the need to lose space.”*
- 3.5.4 In terms of future supply, this demonstrates that there is no need for the NLPR to identify new sites to accommodate un-met need – as there is none. The RLNA notes that, *“The absence of ‘need’ does not preclude quality redevelopment coming forward in town centres in order to enhance and consolidate, and also to replace unwanted vacant space, but it does mean there is no need to allocate sites on the edge of, or outside town centres to accommodate additional comparison goods floorspace”* (paragraph 18.35).

Convenience floorspace future need

- 3.5.5 The RLNA has carried out a similar assessment for the need for future convenience floorspace. It concludes that: *“The quantitative analysis does, however, identify a strong level of residual expenditure sufficient to support additional convenience goods floorspace across the borough. The projections forecast need for 9,611 sq m net by 2026, 9,335 sq m net by 2031, 9,154 sq m net by 2036, 9,036 sq m net by 2041, falling marginally to 8,918 sq m net by 2043. It should be noted that projections beyond 2026 should be treated with caution given growing margins of error over longer time periods, and an ongoing uncertain economy”* (paragraph 18.36).

¹⁰ Urban Shape and Hatch, [Royal Borough of Kensington and Chelsea: The Retail and Leisure Needs Assessment](#), November 2021.

Leisure floorspace future need

- 3.5.6 The RLNA has considered the need for new leisure uses. It recognises that commercial leisure and cultural uses have played an increasingly important role in the vitality and viability of the borough's town centres.
- 3.5.7 It confirms the continued strength of the café and restaurant sector across the borough, and identifies a need for additional cafes in the Earl's Court District Centre. The reforms to the GPDO means that these can be met within the E class, without the need for any particular policy intervention.

Recommendations

- 3.5.8 The RLNA makes a number of recommendations. With regard to borough-wide planning policy recommendation, of particular relevance is recommendation RBKC5, which states ***"The identification of sites to meet the retail and commercial leisure floorspace 'need' should be subject to the sequential test. In accordance with the approach set out in the NPPF (paragraphs 87-88), floorspace should be directed towards the Council's network of International, Major and District centres in the first instance, followed by proposed town centre/place-making site allocations at Kensal Canalside and Earl's Court, and then appropriate and well-connected edge-of-centre sites. Based on the evidence presented, there is no requirement to allocate sites outside of the network of town centres for comparison or leisure floorspace, but the Council should allocate sites to meet forecast convenience goods need over the plan period. This should be directed to the network of town centres and the two major Opportunity Areas at Kensal Canalside and Earls Court in the first instance. Any surplus need beyond this will be accommodated by vacant town centre floorspace and the existing network of town centre and out-of-centre foodstores. These foodstores have been identified as economically over-trading, but are not 'over-capacity' in qualitative terms, demonstrating the ability to absorb additional shoppers and spend."***
- 3.5.9 With regard need for future floorspace, three are recommendations of particular relevance:
- "RBKC10: There is no need to allocate sites outside town centres for comparison of leisure floorspace over the plan period. This should be kept under review, particularly beyond the first year period to 2026.*
- RBKC 11: Set out preferred locations and sites to meet the convenience need arising focusing on the network of town centres and Opportunity Areas in the first instance.*
- RBKC12: Allocate strategic town and edge of centre sites for mixed use retail/leisure development, and also the Kensal Canalside and Earls Court/ West Kensington Opportunity Area to meet the forecast need for convenience goods."*

3.6 THE CHARACTER STUDY

- 3.6.1 The Character Study¹¹ provides a baseline townscape character assessment for the borough, identifying its locally distinctive character areas. It focusses on the areas of the borough which can more easily accommodate change, forming a framework for further work and future area and site-specific design briefs or design codes. However, it is noted that the Character Study opportunities mapping has not identified any new site that could be allocated but provided the general recommendation on how the growth can be achieved through incremental, small-scale development.
- 3.6.2 The potential for growth of different parts of the borough has been assessed by combining the analysis of sensitivity to change and likelihood of change. The matrix in Table 1 of the report illustrates how the assessments of sensitivity and likelihood of change are combined to indicate potential for growth. These are mapped in Figure 219 of the report. Kensal Canalside OA and Earl's Court OA are identified as areas that have the most potential opportunity for growth.
- 3.6.3 The study identifies an opportunities map (Figure 220), which is based on the potential for growth map, but excludes areas of low and very low potential. In addition to the known areas of change (Opportunity Areas and strategic sites identified in the existing Local Plan), the study also identifies additional opportunities for good growth for different building types. Each opportunity is set out in Table 2 of the report. Total of 11 areas were identified in addition to the known areas of change, although most of them are highly constrained either by high sensitivity of surroundings, land use or infrastructure work required. Therefore, the Study notes that most of the growth will be achieved through incremental, small-scale development, such as infill, upward extension or co-location.

3.7 HERITAGE IMPACT ASSESSMENTS

- 3.7.1 Heritage Impact Assessments¹² have been undertaken for site allocations in the draft Local Plan which assess the significance of any heritage assets affected by these allocations and the likely impact of allocation. The purpose of this is to avoid, where possible, harm to the significance of heritage assets, and to identify opportunities for better revealing their significance. Consideration is also given to whether impacts can be mitigated (for example through townscape and visual impact assessments). While the assessment is largely focused on designated heritage assets, some non-designated heritage assets are also taken into consideration.

¹¹ Arup, Royal Borough of Kensington and Chelsea: Character Study, February 2022.

¹² RBKC, Heritage Impact Assessments for Draft Local Plan Site Allocations, October 2022.

3.8 FLOOD RISK SEQUENTIAL TEST

- 3.8.1 The aim of the Flood Risk Sequential Test¹³ is to ensure that a sequential approach is followed to steer new development to areas with the lowest probability of flooding. The Flood Risk Sequential Test is informed by the Strategic Flood Risk Assessment¹⁴ which provides the latest flood risk data and guidance to inform the Sequential Test and provides guidance on how to apply the Exception Test.
- 3.8.2 Part 3 of the Flood Risk Sequential Test Report provides an assessment of all 16 sites that are being allocated in the NLPR. The report concludes that 13 sites are located in Flood Zone 1 and they are predominantly outside of Critical Drainage Areas.
- 3.8.3 Remaining three sites (SA2 Earl's Court Exhibition Centre, SA6 Lots Road South and SA11 The Plaza, 535 King's Road) are located in Flood Zone 2 when the flood defences of the River Thames are not taken into account, but are shown to be benefiting from the River Thames flood defences.
- 3.8.4 Only one of the sites (SA2 Earl's Court Exhibition Centre) remains partially at residual risk of flooding should the tidal flood defences of the River Thames breach. However, the report states that *"as there is a plan for the continued protection of fluvial and tidal flooding from the River Thames in the TE2100 Plan, it is considered that the defences will be maintained and raised into the future in line with climate change projections. The Sequential Test was therefore passed for all sites"* (paragraph 4.1.3).

3.9 THE LOCAL PLAN VIABILITY STUDY

- 3.9.1 BNP Paribas Real Estate have undertaken a Local Plan Viability Study¹⁵ on behalf of the Council to test the deliverability of the NLPR Policies. The study takes account of the impact of the Council's planning requirements, including affordable housing policy in line with the requirements of the NPPF; the PPG and the Local Housing Delivery Group guidance "Viability Testing Local Plans: Advice for planning practitioners".
- 3.9.2 The Viability Study appraised 30 development typologies on sites across the Borough to represent the types of sites that the Council expects to come forward over the life of the NLPR. The typologies are informed by the site allocations in the NLPR as well as other sites that have come forward recently, and therefore reflect the scale of schemes expected to come forward over the plan period. Many of the typologies incorporate a mix of uses, alongside residential. These uses include retail, food retail, office floorspace and community uses.

¹³ RBKC, Flood Risk Sequential Test, October 2022.

¹⁴ JBA Consulting, Royal Borough of Kensington and Chelsea Level 1 Strategic Flood Risk Assessment, October 2022.

¹⁵ BNP Paribas Real Estate, Royal Borough of Kensington and Chelsea Local Plan: Viability Study.

3.10 THE INTEGRATED IMPACT ASSESSMENT (IIA)

- 3.10.1 The IIA¹⁶ assessed 16 sites allocations and 14 reasonable alternatives. RAG assessments have been undertaken for both the proposed sites and alternative sites prior to the full IIA assessment of each of the sites. The IIA in paragraph 6.2.4 concludes:

“In general sites have performed well against the RAG criteria. Due to the nature of the Borough, with its many historic designations, including Listed Buildings and Conservation Areas, there are some amber and red ratings for these indicators. Despite this, sensitive design of the proposed sites would help to mitigate any potential negative effects.

Due to the urban nature of the Borough, each of the proposed sites has excellent access to Shopping Centres, education, and healthcare facilities. This is reflected in the green ratings for these indicators. There are also mostly good transport links across the Borough, reflected in the green and amber ratings for the PTAL scores of the different sites.”

- 3.10.2 The cumulative assessment of the sites is considered in Section 7 of the IIA, whilst mitigation measures are discussed in Section 8. Appendix B of the IIA contains the detailed assessment of each site.

3.11 INFRASTRUCTURE DELIVERY PLAN (IDP)

- 3.11.1 The IDP¹⁷ identifies all major infrastructure which is needed over the life of the NLPR. This includes not only Council provided services and facilities but also those for which public, private and voluntary sectors are responsible. The document sets out infrastructure required to support growth in the Borough and identifies projects that Community Infrastructure Levy (CIL), planning contributions and other funding sources may help deliver.
- 3.11.2 The IDP will assist the Council and other service providers to identify and prioritise infrastructure provision as part of an integrated approach to planning and infrastructure development. The Infrastructure Schedule can be found in Section 12 of the IDP and it details the timescales for delivery and funding mechanisms for infrastructure requirements

¹⁶ WSP, Royal Borough of Kensington and Chelsea: Local Plan Review Integrated Impact Assessment, October 2022.

¹⁷ RBKC, Infrastructure Delivery Plan, October 2022.

4 GENERAL PRINCIPLES

4.1 COMPLIANCE WITH ALL OTHER POLICIES IN LOCAL PLAN

- 4.1.1 None of the site allocations set out specific requirements for community housing. This is because it is assumed that schemes will provide a policy compliant mix of community housing. This has been tested using a range of typologies in the Local Plan Viability Study.
- 4.1.2 The Local Plan Viability Study has tested the whole plan viability as required by the NPPF including all the Climate Change policies. Therefore, all other policy requirements are also assumed to be met and these are not repeated in the site allocations.

5 LARGE SITES

5.1 100/100A WEST CROMWELL ROAD

INTRODUCTION

- 5.1.1 The site lies to the north of the West Cromwell Road opposite the Earl's Court Opportunity Area, on the western boundary of the Borough bordering the London Borough of Hammersmith and Fulham, adjacent to the West London Line. The site area is 1.7 ha.
- 5.1.2 The site was allocated through Policy CA5 of the Local Plan 2019 for a mixed use development to include residential, leisure and social and community floorspace. The relevant policy sections that refer to the 100/100A West Cromwell Road are set out below:

Policy CA5: Warwick Road Sites

The Council allocates development on the site to deliver, in terms of:

Land use

- a (iv). a minimum of 450 (C3) residential units on the 100/100A West Cromwell Road site;
- c. On the 100/100A West Cromwell Road site: leisure, social and community uses (Class D1), provision of car parking and open amenity space;

Infrastructure and Planning Contributions

- f. affordable housing as part of residential development on all the sites to ensure a mixed and balanced community;
- g. social and community facilities;
- h. community sports hall and public swimming pool;
- k. landscape improvements to the West Cromwell Road in connection with 100/100A West Cromwell Road site;
- l. streetscape improvements to Warwick Road in connection to all development sites;
- m. pedestrian and cycle improvements;
- o. a contribution to investigate and implement measures to return the Earl's Court one-way system to two-way working;
- p. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs.

- 5.1.3 Since the adoption of the current Local Plan, a start has been made on the site following a planning permission in 2020. However, given the scale of the development it was considered helpful to retain the site as an allocation in the NLPR. As the other sites on Warwick Road are now complete it is being taken forward as a stand-alone site.

EVIDENCE BASE

- 5.1.4 Since adoption of the Local Plan 2019, planning permission ([PP/19/00781](#)) was granted in June 2020 for a mixed-use development which includes “*Partial demolition and reconfiguration of existing structures and erection of eight buildings up to a maximum of 29 storeys (above podium) to provide 462 residential units (C3) including the provision of 186 affordable housing units, a public leisure centre including a gym and pool (D1/D2), commercial/retail space (B1, flexible B1/A1/A3 and B1/D1/D2), alongside hard and soft landscaping, car parking and cycle spaces, public realm improvements and all ancillary and associated works including servicing, storage, plant and equipment*”. This extant planning permission and development principles outlined in the Warwick Road SPD¹⁸ served as a basis for updating the site allocation.
- 5.1.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. Therefore, the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy. However, as the site is bigger than 1 ha, a Flood Risk Assessment should be submitted to support any future planning application.
- 5.1.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

QUANTUM OF DEVELOPMENT

- 5.1.7 The minimum number of homes remain unchanged from the previous site allocation in the Local Plan 2019, as 450. The extant planning permission is only marginally higher for 462 homes.
- 5.1.8 The requirement to provide commercial floorspace (office, retail, restaurant, food and drink) is based on the approved scheme. With a PTAL of 6a, the site is considered to be in a highly accessible area. The proposed commercial floorspace would likely attract a range of occupiers and contribute positively to addressing the identified need of 60,500 sqm of office floorspace in the Borough up to 2043¹⁹.

¹⁸ RBKC, [Warwick Road Planning Brief SPD](#), January 2008.

¹⁹ Icen Projects Limited with BNP Paribas Real Estate, Employment Land Study: Royal Borough of Kensington and Chelsea, Final Report, October 2021, (paragraph 10.15).

- 5.1.9 A public leisure centre featuring gym and swimming pool is part of the approved scheme and is included in the site allocation. This part of the Borough is identified having the highest unmet demand for the swimming pools²⁰ as well as sport halls²¹, and indeed it is a critical key requirement of the wider Warwick Road site allocation in Policy CA5 of the existing Local Plan. The site allocation therefore helps meet an identified need, providing substantial benefits to borough residents.

PRINCIPLES

- 5.1.10 Existing infrastructure planning contributions *k) l) m) p)* outlined in the current site allocation are still relevant and hence remain unchanged.
- 5.1.11 A requirement for “a contribution to investigate and implement measures to return the Earl’s Court one-way system to two-way working” has been amended to “A contribution to enhancement of the Earl’s Court one way system in line with the Healthy Streets Approach, including safety measures, greening, increased space for active travel and buses, and lower speed limits.”

BUILDING HEIGHTS

- 5.1.12 Policy D9 of the London Plan requires Boroughs to determine any locations where tall buildings may be a suitable form of development and to identify appropriate tall building heights. The extant planning permission was granted for the erection of eight buildings up to a maximum of 29 storeys (above podium level), with building heights up to a maximum of 116 metres (AOD). Considering the approved scheme, the site is deemed a suitable location for tall buildings. The maximum building heights are informed by the building heights parameters of the approved scheme.

INFRASTRUCTURE CONTRIBUTIONS

- 5.1.13 The Local Plan 2019 site allocation requires the site to provide “*a contribution to investigate and implement measures to return the Earl’s Court one-way system to two-way working*”. Although this has been a long running aspiration of the Council for many years there is no prospect of this challenging and, costly project being progressed by the Mayor of London during the lifetime of the Local Plan.
- 5.1.14 Instead, a contribution for the enhancement of the Earl’s Court one way system, in line with the Healthy Streets Approach, including safety measures, greening, increased space for active travel and buses, and lower speed limits shall be sought. Improvements that make active travel more attractive and that improve environmental conditions on these streets are consistent with London Plan Policies and the Mayor’s Strategic Approach to Transport and are deliverable. Therefore, this is being taken forward in the site allocation.

²⁰ Sport England, Facilities Planning Model Assessment of Swimming Pools Provision in Kensington and Chelsea, January 2022.

²¹ Sport England, Facilities Planning Model Assessment of Sports Halls Provision in Kensington and Chelsea, January 2022.

- 5.1.15 The junction of West Cromwell Road and Warwick Road has a poor safety record. It is heavily used by pedestrians enroute to and from the local supermarket. It provides a hostile environment for walking and cycling and has been identified as a junction needing attention in public engagement exercises, including that informing the Council's Local Implementation Plan²². This is a TfL managed junction so the Council cannot deliver the improvements directly. Contributions to "Safety improvement and crossing facilities at Warwick Road/ West Cromwell Road junction" are badly needed, are deliverable and are consistent with London Plan Policies and the Mayor's Strategic Approach to Transport.

DELIVERABILITY OF THE SITE

- 5.1.16 The site is in multiple ownership by Tesco Stores Limited, Notting Hill Housing Trust and RBKC.
- 5.1.17 The Housing Trajectory²³ identifies the site as deliverable with 362 homes delivered in the first 5 years and 100 homes delivered in the years 6-10. This is based on the fact that a start has been made on the site following a planning permission in 2020, but given the scale of development it is assumed that some of it might come forward later if development is phased (as indicated in [CON/21/05721](#)).

PUBLICATION POLICY

- 5.1.18 Policy SA3: 100/100A West Cromwell Road is proposed as follows.

Policy SA3: 100/100A West Cromwell Road

A. The site will deliver a high quality mixed use development to include residential, commercial and leisure floorspace.

Land use

- B. A minimum of 450 gross residential units (C3).
- C. Provision of commercial (office, retail, restaurant, food and drink) floorspace.
- D. A public leisure facility (community sports hall and public swimming pool).
- E. Provision of car parking and open amenity space.

Principles

- F. Landscape improvements to the West Cromwell Road in connection to the site.
- G. Streetscape improvements to Warwick Road in connection to the site.
- H. No building on the site should exceed a building height of 116m AOD.
- I. Pedestrian and cycle improvements.

²² RBKC, [Local Implementation Plan](#), April 2019.

²³ RBKC, RBKC Five Year Housing Land Supply and Stepped Housing Trajectory, October 2022.

Infrastructure and Planning Contributions

J. A contribution to enhancement of the Earl's Court one way system in line with the Healthy Streets Approach, including safety measures, greening, increased space for active travel and buses, and lower speed limits.

K. Safety improvement and crossing facilities at Warwick Road/ West Cromwell Road junction.

L. Development will be liable to making planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.2 FORMER TERRITORIAL ARMY SITE, 245 WARWICK ROAD

INTRODUCTION

- 5.2.1 The former Territorial Army site currently is vacant and lies on the western boundary of the Borough bordering the London Borough of Hammersmith and Fulham, adjacent to the West London line. The site area is 0.84 ha.
- 5.2.2 The site was allocated through Policy CA5 of the Local Plan 2019 for a mixed use development to include residential, leisure and social and community floorspace. The relevant policy sections that refer to the Former Territorial Army Site, 245 Warwick Road are set out below:

Policy CA5: Warwick Road Sites

The Council allocates development on the site to deliver, in terms of:

Land use

- a (i). a minimum of 255 residential (C3) units on the Former Territorial Army site;
- b. On the northern three sites on-site public open space, including outdoor play space;

Principles

- d. sufficient non-residential uses on the northern sites to provide active frontages to the ground floor of Warwick Road;
- e. the three northern sites to be developed to a single masterplan;

Infrastructure and Planning Contributions

- f. affordable housing as part of residential development on all the sites to ensure a mixed and balanced community;
- g. social and community facilities;
- l. streetscape improvements to Warwick Road in connection to all development sites;
- m. pedestrian and cycle improvements;
- o. a contribution to investigate and implement measures to return the Earl's Court one-way system to two-way working;
- p. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs

- 5.2.3 Since the adoption of the current Local Plan, the site has not been developed yet and therefore it was decided to carry forward the allocation in the NLPR as a separate site.

EVIDENCE BASE

- 5.2.4 Planning permission ([PP/08/00218](#)) granted in 2008 for a mixed-use redevelopment “*to provide 174 market residential units and 81 affordable residential units, 481 sq.m. of Class A1 (shop), Class A2 (Financial and Professional Services), Class A3 (Restaurant and Cafes) or Class D1 (Non-Residential Institutional) use, together with open space and associated access, parking and landscaping*”. This planning permission is expired, however it still served as a useful basis for updating the site allocation.
- 5.2.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required; therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.2.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

QUANTUM OF DEVELOPMENT

- 5.2.7 The minimum number of housing units remains unchanged (255 units) as per existing Policy CA5.
- 5.2.8 Provision of Class E floorspace with active frontages along Warwick Road is one of the key design objectives and development principles identified in the Warwick Road SPD²⁴. Key features identified in the SPD are “*playing down the physical barrier created by the Warwick Road as a major traffic thoroughfare and integrating the development within its wider residential urban context, and providing new public open space that gives a focus and sense of place*”.
- 5.2.9 The SPD also identified an opportunity to create a public open space in the form of a linear park or garden square running along the northern three sites, which includes Former Territorial Army Site. Provision of linear park remains desirable and therefore is included in the site allocation.

BUILDING HEIGHTS

- 5.2.10 The site is considered to be a suitable location for tall buildings. The 2008 planning permission was granted for three buildings on site with heights ranging from 6 to 10 storeys or 29 m and 41 m Finished Floor Level (FFL). If any alternate scheme is proposed, in the future no building on the site should exceed 41 m FFL.

²⁴ RBKC, [Warwick Road Planning Brief SPD](#), January 2008

DELIVERABILITY OF THE SITE

- 5.2.11 The site is in the ownership of the Government of Russian Federation. The previous planning permission has now expired. There is no prospect of any development on the site in the near future. Nevertheless, this is a development site surrounded now by the recently completed Warwick Road development. Therefore, it is considered developable.

PUBLICATION POLICY

- 5.2.12 Policy SA4: Former Territorial Army Site, 245 Warwick Road is proposed as follows.

Policy SA4: Former Territorial Army Site, 245 Warwick Road

The site should deliver a high quality residential development with some retail.

Land use

- A. A minimum of 255 residential (C3) units.
- B. Class E providing active frontage along Warwick Road.
- C. Public open space, including outdoor play space.

Principles

- D. Active frontage to Warwick Road.
- E. Continuation of the linear open space running through all the sites on Warwick Road.
- F. No building on the site should exceed a building height of 41 m from ground level to the top of the building.

Infrastructure and Planning Contributions

- G. Development will be liable to make planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.3 WORNINGTON GREEN, PHASE 3

INTRODUCTION

- 5.3.1 Redevelopment of the Wornington Green Estate has been underway over a number of years. It is a multi-phase development with Phase 2 nearing completion. This site allocation relates only to the portion of land which has not been developed and will form the final phase – ‘Phase 3’. Prior to its re-development Wornington Green Estate was a post-war housing estate of 535 social rent homes constructed between 1946 and 1985 in predominantly large-deck blocks, typical of public housing of the time. The Estate was identified for regeneration because it failed to meet Decent Housing standards and is the first estate regeneration scheme in the Borough. The Phase 3 site is approximately 1.56 ha, broadly triangular in shape and marks the northern end of Portobello Road. The site is currently occupied by seven residential blocks incorporating two vacant retail units, which form the northern part of the wider Estate, and Portobello Hall (previously known as ‘the Friendship Centre’) which is in community use.
- 5.3.2 Outline planning permission and Phase 1 Reserved Matters for redevelopment of the Wornington Green Estate was granted in 2010 (PP/09/02786), with subsequent planning permission for amendments granted in 2014 ([PP/13/04516](#)). The redevelopment is split into 3 phases: Phase 1 was completed in 2015; sub-Phase 2a was completed in 2020; sub-Phase 2b is scheduled for completion by 2024. Phase 3 is due for completion by 2029.
- 5.3.3 The site was allocated through Policy CA2 of the Local Plan 2019 for a mixed use development to include residential, commercial, social and community floorspace together with the replacement of an improved Athlone Gardens open space. The existing policy is set out below:

Policy CA2: Wornington Green

The Council will require development on the site to deliver, in terms of:

Land use

- a. a minimum of 281 residential (C3) units;
- b. the replacement of an improved Athlone Gardens, measuring 9,186sq.m (GEA), including the area of the existing ball court;
- c. the refurbishment or replacement of an improved community facility and scope for its enlargement, including the provision of the existing community and leisure facilities currently provided;
- d. A1 to A5 uses in the order of approximately 2,000sq.m, providing these animate the street frontage, extend the retail offer along Portobello Road and help reconnect the link from Portobello Road and/or Wornington Road to Ladbroke Grove with no one unit being over 400sq.m (GEA);
- e. on-site renewable energy sources to serve the site with the potential to contribute to the heat and energy demand of the wider community as part of a

district heat and energy network;

f. replacement of the storage used by market traders in Munro Mews;

Principles

g. an integrated community, where current tenants who want to remain at Wornington Green will be guaranteed a new home on the new development and the vast majority of residents should only have to move once;

h. a phasing scheme to minimise disruption to residents and adjoining neighbours during the construction period;

i. a good quality open space at least half the size of Athlone Gardens (4,593sq.m) must be available for public use throughout the construction period;

j. the reconnection of Portobello Road and Wornington Road to Ladbroke Grove and the reestablishment of the traditional street pattern in the area;

Infrastructure and Planning Contributions

k. affordable housing;

l. a site management plan;

m. the reinstatement of an improved Athlone Gardens, community facility and adventure playground;

n. play space and play equipment;

o. healthcare facilities;

p. education facilities;

q. construction training contribution;

r. neighbourhood policing facilities, should they be required;

s. mitigation for any negative transport impacts;

t. improvements to public transport arising from the development, including improvements to the bus infrastructure;

u. walking, cycling and public realm improvements;

v. arrangements for on-street residents' permit-free parking;

w. sustainable development measures as set out in the Wornington Green Supplementary Planning Document;

x. public art; and

y. other contributions as identified in the Planning Obligations Supplementary Planning Document and site specific supplementary planning document.

- 5.3.4 Since the adoption of the current Local Plan, the site has not been developed yet in full and therefore it was decided to carry forward the allocation in the NLPR for the Phase 3 of the development.

EVIDENCE BASE

- 5.3.5 Wornington Green Planning Brief SPD²⁵ was prepared in response to the potential redevelopment of the Estate and was adopted back in 2009. The SPD sets out the Council's requirements for the redevelopment of the Wornington Green Estate, detailing the redevelopment priorities and measures to ensure resident's concerns about the redevelopment are addressed. The Brief defines the infrastructure that is required to support the community when the development is occupied. A particular emphasis within the SPD is on safeguarding Athlone Gardens and the Venture Centre.
- 5.3.6 Outline planning permission and Phase 1 Reserved Matters for redevelopment of the Wornington Green Estate was granted in 2010 (PP/09/02786), with subsequent planning permission for amendments granted in 2014 ([PP/13/04516](#)).
- 5.3.7 The redevelopment of the Estate is split into 3 phases, permitting up to a 1,000 homes across all phases, with the net gain minimum of 462 homes (1,000 consented in outline – 535 existing). Phase 1 was completed in 2015, delivering 174 social rent, 9 shared ownership and 141 market sale.
- 5.3.8 The London Development Database (LDD) now the Planning London Datahub and our own Monitoring Reports have recorded a net gain of 193 homes for Phase 2 (2020 AMR). The 2015 AMR has a net gain completed figure of 181 homes. In total therefore a net gain of 374 homes has already been recorded. These figures have assumed Phase 2b to be complete ahead of its completion. As such including the figures again would be double counting. Therefore, the net gain figure for what is deliverable for the purposes of the Local Plan in Phase 3 is below what will be completed.
- 5.3.9 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. The SFRA shows that the site does not fall within an area which is likely to have very high susceptibility to groundwater flooding due to the impermeable underlying geology. The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.3.10 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

²⁵ RBKC, [Wornington Green Planning Brief SPD](#), November 2009.

QUANTUM OF DEVELOPMENT

- 5.3.11 Phase 3 is subject to a live, full planning application ([PP/21/07028](#)) for *“Demolition of existing buildings/structures to enable redevelopment of the site (Phase 3) to provide between 373 and 377 residential dwellings (Use Class C3) across three blocks of five buildings ranging from 4 to 15 storeys in height, with ground floor commercial space (Use Class E), and provision of a community centre with associated adventure playground and steel pan workshop (Use Class F.1/F.2 with up to 615 sqm flexible Use Class E/F.1/F.2 floorspace), along with a community kitchen garden at roof level, and cycle parking, landscaping and public realm improvements”*. Should permission be granted, building works are expected to commence in January 2025, and complete in September 2029. This planning application served as the basis for the updated site allocation, including the minimum quantum of residential units required, the refurbishment or replacement of community facility and provision of public open space.

PRINCIPLES

- 5.3.12 The principle to ensure that current residents who want to remain at the Estate will be guaranteed a new home on the new development remains valid as there are still people living in housing blocks that due to be redeveloped in Phase 3.
- 5.3.13 A phasing scheme principle to minimise disruption of existing residents also remains relevant as Phase 3 is expected to be further subdivided into subphases.
- 5.3.14 Requirement to ensure that a good quality open space at least half the size of Athlone Gardens (4,593 sq m) is available for public use throughout the construction period also remains valid. The re-provided New Athlone Gardens can only be fully delivered once the existing Venture Centre moves to its new community centre location in Phase 3.
- 5.3.15 Requirement for re-connection of Portobello Road and Wornington Road to Ladbrooke Grove and the re-establishment of the traditional street pattern remains relevant. The wording is further strengthened by explicit support for street layouts that favour active travel and discourage car traffic in the area.

INFRASTRUCTURE AND PLANNING CONTRIBUTIONS

- 5.3.16 The key specific non-financial requirements follow the details of the previously granted permissions.

DELIVERABILITY OF THE SITE

- 5.3.17 The landowners responded to the NLPR Regulation 18 consultation stating that *“Phase 3 is subject to a live, full planning application proposing to deliver between 373 and 377 residential units, as well as the new community centre and adventure playground (LPA ref. PP/21/07028). Should permission be granted, building works are expected to commence in January 2025, and complete in September 2029.”* Therefore, the site is considered developable. The quantum of development for the purposes of the housing trajectory is as explained in 5.3.11 above.

PUBLICATION POLICY

5.3.18 Policy SA5: Worrington Green, Phase 3 is proposed as follows.

Policy SA5: Worrington Green Estate, Phase 3

The site should deliver a high-quality residential development.

Land use

- A. A minimum of 373 gross residential (Class C3) units.
- B. The refurbishment or replacement of an improved community facility and scope for its enlargement, including the provision of the existing community and leisure facilities currently provided.
- C. Public open space, including adventure playground.

Principles

- D. An integrated community, where current tenants who want to remain at the Worrington Green Estate will be guaranteed a new home on the new development and the vast majority of residents should only have to move once;
A phasing scheme to minimise disruption to residents and adjoining neighbours during the construction period;
- E. A good quality open space at least half the size of Athlone Gardens (4,593 sq m) must be available for public use throughout the construction period;
- F. The re-connection of Portobello Road and Worrington Road to Ladbrooke Grove and the re-establishment of the traditional street pattern with street layouts that favour active travel and discourage car traffic in the area.

Infrastructure and Planning Contributions

- G. Affordable housing, with Housing Needs Assessment and Nominations Agreement;
- H. Community Centre and associated outdoor space;
- I. Residents' Room which re-provides an existing facility;
- J. Re-provision of the open space (new Athlone Gardens) with a temporary space provided during construction;
- K. Development will be liable to make planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.4 LOTS ROAD SOUTH

INTRODUCTION

- 5.4.1 The Lots Road South site lies in the south-west corner of the borough, on the south-western side of Lots Road between Chelsea Harbour and King's Road. It is currently occupied by a vehicle pound and two warehouse buildings. The site is located within Lots Road Employment Zone and is immediately adjacent to the Lots Village Conservation Area.
- 5.4.2 The site is owned by the Council and the Council's ownership extends beyond the borough boundary into the London Borough of Hammersmith and Fulham. The larger part and existing buildings are within the Royal Borough of Kensington and Chelsea.
- 5.4.3 The site was allocated through Policy CA7 of the Local Plan 2019 for a mixed use development to include residential and employment floorspace. The full policy is set out below:

Policy CA7: Site at Lots Road

A mixed use development to include residential and employment floorspace. The Council allocates development on the portion of the site within the Royal Borough to deliver, in terms of:

Land use

- a. a minimum of 55 affordable extra care units (C2);
- b. a minimum of 4000sq m (GIA) of commercial floorspace (A1, B1 and B8) of which at least 2000 sq m will be business floorspace (B1 or B8);

Principles

- c. active street frontages to Lots Road;
- d. development that respects the setting of the Lots Village Conservation Area;
- e. development of a scale and density that is appropriate to its surroundings;
- f. protection of the auction house use;
- g. seek an east west cycling and pedestrian link across the West London Line connecting to the Imperial Gasworks National Grid site.

Infrastructure and Planning Contributions

- h. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs.

EVIDENCE BASE

- 5.4.4 A Supplementary Planning Document (SPD)²⁶ for a design brief for the Lots Road South site was developed over a period from March 2021, when early engagement with the local community commenced, to September 2022, when the document was adopted. This provides additional design guidance for the site to support the site allocation.
- 5.4.5 In November 2021, approval to progress a number of inter-linked projects relating to development proposals in Lots Road and the wider area was agreed by the Council's Leadership Team. The [Leadership paper](#) published to set out the approach to progressing the projects, including proposals for the Lots Road South site, includes high-level capacity testing of the site using three options and massing approaches. Each option includes 65 extra care homes and 5,000 sqm of commercial floor space with the differences between the three options set out below:
- Option A – maximum height of 8 storeys; 137 homes (in addition to extra care units)
 - Option B – maximum height of 10 storeys; 137 homes (in addition to extra care units)
 - Option C – maximum height of 13 storeys; 162 homes (in addition to extra care units)
- 5.4.6 According to the Sequential Test, the site falls partly within Flood Zone 1 (34.78%) and 2 (65.22%). The site is shown to be entirely protected from fluvial and tidal flooding by the River Thames Flood defences, or which the southern site boundary forms part of the defence. Breach modelling demonstrates that the entire site is not at risk of flooding should the flood defences be breached and therefore the primary risk and residual risk of flooding to the site is low. The site is outside a Critical Drainage Area and the SFRA shows that the site falls within an area which is likely to have very high susceptibility to groundwater flooding and permeable deposits. As the risk of flooding to the site is low due to the presence of the tidal flood defences and the risk of inundation in the event of a breach of those defences is also low, the Sequential Test is therefore deemed to have been passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.4.7 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

²⁶ RBKC, [Lots Road South Design Brief SPD](#), September 2022.

QUANTUM OF DEVELOPMENT

- 5.4.8 The inclusion of a minimum of 100 homes in the site allocation reflects the acute housing need in the borough and is informed by the options included in the Council's November 2021 Leadership Paper. The massing studies indicate that the site has capacity for a significant number of homes in addition to the extra care units and after the provision of 1,000 sqm of commercial floorspace in excess of the existing. The capacity studies are high-level and therefore it is considered appropriate to set the minimum number of homes at 100 in order to allow for flexibility at detailed design stage
- 5.4.9 There is also a longstanding commitment to provide an affordable extra care facility with new homes that meet adult social care needs in the south of the Borough. This follows the closure and subsequent redevelopment of the Council's Thamesbrook nursing and residential home which was located in Dovehouse Street in Chelsea. The Council considers the site in Lots Road to be the only viable opportunity to deliver an extra care facility due to the lack of available Council owned land sites in the Borough. The minimum number of affordable extra care homes included in the allocation has been increased from 55 to 65 units because this an optimum number of units for efficient operation of an extra care facility. It also reflects the need for extra care homes in the south of the borough, as advised by the Council's adult social care department.
- 5.4.10 The minimum quantum of commercial floorspace reflects the existing quantum of floorspace. The reprovision of at least the same quantum is required to support the Employment Zone. The minimum quantum of office floorspace within the overall minimum has been increased to 3,000 sqm from the current policy because of the change in the Use Class Order to ensure the replacement floorspace is appropriate for the Employment Zone.

DESIGN PRINCIPLES

- 5.4.11 The Lots Road South Design Brief Supplementary Planning Document (SPD) was developed over a period from March 2021, when early engagement with the local community commenced, to September 2022, when the document was adopted. This provides additional design guidance for the site to support the site allocation.
- 5.4.12 The design principles that emerged from this process are included as the principles within the site allocation

BUILDING HEIGHTS

- 5.4.13 The maximum building heights are informed by the preferred option (option A) presented in the 2021 Leadership Paper, and by design principles 3 and 5 in the design brief:

3. Lots Road buildings

There should be a series of buildings along Lots Road with modest variation in form, rather than a uniform block, at a height that respects the scale of existing buildings on Lots Road.

5. Overall height principles

The development should locate taller buildings away from Lots Road, to more suitable parts of the site.

- 5.4.14 The preferred option ranged in height from 7 to 8 storeys. Given the site's context with backdrop of tall buildings in Hammersmith & Fulham, and with a sensitive road frontage along Lots Road, it is considered that a greater variation of heights is preferable, distributed across the site. This has informed the maximum building height range of 6 to 10 storeys, with a specific proposal being assessed at planning application stage.

DELIVERABILITY OF THE SITE

- 5.4.15 The site is in Council ownership. The Council intends to progress the site in 2023 and, should planning permission be granted, start building soon after that. The site will see completions within the next five years. Therefore, the site is considered deliverable and all homes are within the first five years of the housing land supply.

PUBLICATION POLICY

- 5.4.16 Policy SA6: Lots Road South is the revised site allocation and is set out below:

SA6: Lots Road South

A. The site will deliver a high quality mixed use development to include residential and employment floorspace.

Land use

B. A minimum of 100 new gross residential (C3) units.

C. A minimum of 65 gross affordable extra care units.

D. A minimum of 4,000 sq m (GIA) of commercial floorspace (Class E and B8) of which at least 3,000 sq m will be business floorspace (Class E(g) or B8).

Principles

E. Building heights should respond to the principles in the Lots Road South Design Brief SPD with maximum heights within the range of 22 m to 34 m from ground level to the top of the building or 6 storeys to 10 storeys.

F. The character should be employment use led, informed by end user needs incorporating flexibility, opportunities for collaboration and practical needs.

G. The design, construction and operation of the development shall be informed by the energy hierarchy, circular economy and urban greening principles.

H. There should be a series of buildings along Lots Road with modest variation in form, that respects the scale of existing buildings on Lots Road.

- I. Ensure the architecture and materials reference the industrial heritage and character of the area.
- J. The development should locate taller buildings away from Lots Road.
- K. Create an active frontage on Lots Road with a variety of commercial uses at ground floor.
- L. Create courtyard space(s) within the development accessed through gaps between buildings.
- M. Ensure the development does not compromise the quality of the light to Heatherley School of Fine Art north-east facing windows.
- N. Create a new attractive and welcoming public space that is accessible to all.
- O. Make a feature of the creek within the landscape strategy.
- P. Incorporate a buffer zone along the full length of the site adjacent to the railway, to allow for a future cycleway and pedestrian route.
- Q. Led by a clear servicing strategy, including for van drop-offs and collections.
- R. Community space shall be located above basement level and allow for wide range of activities
- S. Locate the extra care use in an optimal location for future residents following the principles of Design for Dementia; including outdoor space.
- T. Ensure some on-site facilities are designed to provide overlaps between the different resident groups, workers and the wider community.

Infrastructure and Planning Contributions

- U. Development will be liable to make planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.5 EDENHAM WAY

INTRODUCTION

- 5.5.1 The site encompasses the former Edenham Care Home and land adjoining Trellick Tower. Surrounding the site is the neighbouring Cheltenham estate, a mixed use block that fronts on to the northern end of Golborne Road, and the Golborne Road (North) neighbourhood shopping centre. The Edenham Care Home, previously on the site, was demolished in 2008, and it is currently being used as a temporary coach park. The site area is 0.77 ha.
- 5.5.2 Trellick-Edenham Planning Brief SPD²⁷ was produced in 2015, setting out the parameters for the redevelopment of the site.
- 5.5.3 The site is owned by the Council and is part of New Homes Delivery Programme (NHDP). The Programme aims to build 600 homes across the borough, 300 of which are much-needed social rent homes for those residents on our housing waiting list.
- 5.5.4 The site was allocated through Policy CA3 of the Local Plan 2019 for a mixed use development to include residential and social and community floorspace. The full policy is set out below.

Policy CA3: Land Adjacent to Trellick Tower

The Council will require development on the site to deliver, in terms of:

Land use

- a. a minimum of 60 residential (C3) units;

Principles

- b. a suitable setting for the designated heritage assets including the Grade II* listed Trellick Tower;

Infrastructure and Planning Contributions

- c. additional social and community uses including health provision to be included as part of any redevelopment;
- d. improvements to the public realm and open spaces around the site;
- e. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs.

²⁷ RBKC, [Trellick-Edenham Planning Brief SPD](#), May 2015.

5.5.5 Since the adoption of the current Local Plan, the site has not been developed yet and therefore it is considered appropriate to carry forward the allocation in the NLPR.

EVIDENCE BASE

5.5.6 General principles of the existing policy remain unchanged and are carried forward into the new policy.

5.5.7 In March 2015, the Council has adopted a supplementary planning document (SPD) for the vacant land adjacent to Trellick Tower in order to help guide development on this site²⁸. A number of design objectives were identified in the SPD:

“1 Improve visual and physical links through the site from Elkstone Road, and from Edenham Way to Golborne Road;

2 Improve the public realm and open spaces in and around the site;

3 Integrate the new housing into the existing estate;

4 Resolve the difficulties created by the level changes and isolated spaces across the site;

5 Preserve and enhance the character, appearance and setting of designated heritage assets, especially Trellick Tower” (paragraph 3.4).

5.5.8 These objectives were reflected in the current site allocation wording in Local Plan 2019. All of them remain relevant and hence are carried forward into the new policy.

5.5.9 Planning application (PP/21/07663) has been submitted by the Council in December 2021 for *“Demolition and alteration works and redevelopment to erect five buildings between 2 and 14 storeys (plus plant) comprising new homes and new community/ commercial space, landscaping, car parking, servicing/ access arrangements and associated works”* which would deliver 112 homes with 50 per cent of those being affordable.

5.5.10 This application was later withdrawn due to residents’ concerns. As a result of putting the scheme on hold, the Council had to hand back the GLA grant of £5.2m, as it was no longer able to meet GLA timescales for construction of the project. In addition, the construction market continues to witness continuing increases in costs. These two points therefore have an impact on the project’s viability and the Council’s ability to fund and deliver the project.

²⁸ RBKC, [Trellick-Edenham Planning Brief SPD](#), March 2015.

- 5.5.11 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.5.12 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

BUILDING HEIGHTS

- 5.5.13 The Trellick-Edenham SPD suggests that “The scale of development must respect existing buildings on the site. This will range from lower rise buildings of 2-4 storeys adjacent to Edenham Way, to medium rise buildings towards the western part of the site. Here the site is dominated by the two blocks of Trellick Tower, which rise to 31 and 7 storeys; proposals for buildings of between 4-6 storeys may be appropriate here to ensure the site provides a good number of housing units, whilst not detracting from the setting of Trellick Tower” (paragraph 3.31).
- 5.5.14 The withdrawn scheme proposed building heights ranging between 2 and 14 storeys. This served as the basis for setting the maximum building heights. It is acknowledged that this is considerably taller than initial recommendation for 4-6 storeys buildings, however, as the policy sets out the **maximum** height, this is deemed appropriate.

DELIVERABILITY OF THE SITE

- 5.5.15 The site is in Council ownership. The Council intends to progress the site in 2023 and should planning permission be granted, start building soon after that. The site will see completions within the next five years. Therefore, the site is considered deliverable, and all homes are within the first five years of the housing land supply.

PUBLICATION POLICY

- 5.5.16 Policy SA7: Edenham Way was revised and is proposed as follows.

SA7: Edenham Way

A. The site will deliver a high quality residential development with some social and community use.

Land use

B. A minimum of 60 gross residential (C3) units.

C. Additional social and community uses including health provision to be included as part of any redevelopment.

Principles

- D. Building heights within the range of 8 m to 50 m from ground level to the top of the building or 2 storeys to 14 storeys.
- E. A suitable setting for the designated heritage assets including the Grade II* listed Trellick Tower.
- F. Improvements to the public realm and open spaces around the site including improvements to the service areas and basements of Trellick building.

Infrastructure and Planning Contributions

- G. Development will be liable to making planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.6 CHELSEA FARMER'S MARKET

INTRODUCTION

- 5.6.1 The site lies on Sydney Street, close to the junction with King's Road and is well located for public amenity and transport hubs, as well as sports, leisure and retail facilities. To the south, the site is occupied by a Chelsea Farmers' Market – a collection of non-permanent chalets and kiosks containing a variety of small shops, cafes and restaurants. The northern part is occupied by a garden centre. The site area is 0.6 ha.
- 5.6.2 The site was allocated through Policy CA9 of the Local Plan 2019 for a mixed use development to include residential and commercial floorspace. The full policy is set out below.

Policy CA9: Chelsea Farmers' Market

The Council allocates development on the site to deliver, in terms of:

Land use

- a. a minimum of 50 (C3) residential units;
- b. retail units at ground level facing 151 Sydney Street;
- c. the creation of a new public square facing 151 Sydney Street and linking to Dovehouse Green;

Principles

- d. residential-led mixed use development;
- e. provision of active retail frontages facing onto the new public square;

Infrastructure and Planning Contributions

- f. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs;
- g. provision of a new public square.

- 5.6.3 Since the adoption of the current Local Plan, the site has not been developed yet and therefore it is considered appropriate to carry forward the allocation in the NLPR.

EVIDENCE BASE

- 5.6.4 Planning permission ([PP/16/04366](#)) was granted in November 2017 for *“demolition of existing buildings and erection of part 5, part 6 storey buildings with part 1, part 2 storeys of basement to provide a mixed use development comprising 59 residential units, and flexible retail uses (Class A1, A2, A3) and the creation of new publicly accessible landscape spaces, associated car, cycle parking, landscaping and amenity and all necessary enabling works”*. A time limit of 15 years applies to this planning permission due to the fact that all of the site falls within the Safeguarding Limits in the Crossrail 2 Safeguarding Direction.
- 5.6.5 A Royal Brompton Hospital SPD²⁹ was produced following the merger of the Royal Brompton & Harefield Foundation Trust with St Guy’s and St Thomas’ NHS Foundation Trust in February 2021. The merger was expected to result in the relocation of all services currently provided at the Brompton site in Chelsea, allowing for the sale of the site and possible redevelopment. The Council wished to ensure that a principal healthcare use remains on the site, given the Royal Brompton’s longstanding international recognition as a centre for excellence in the research and treatment of heart and lung conditions, so the SPD was produced. The SPD contains guidance on how medical uses can be viably retained and enhanced as part of a site-wide masterplan approach. Chelsea Farmers’ Market site has been identified as having opportunity to provide residential uses complementary to medical facilities, create a new market square, with a vibrant mix of retail, restaurant and cafe uses.
- 5.6.6 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and is outside a Critical Drainage Area. The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required; therefore, the development is in an appropriate location under the NPPF flood risk policy.
- 5.6.7 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.
- 5.6.8 Proposed quantum of development, principles and infrastructure contributions as outlined per existing Site Allocation Policy CA9 all remain relevant and therefore are carried forward without changes into the new policy.

²⁹ RBKC, [Royal Brompton Hospital SPD](#), April 2021.

DELIVERABILITY OF THE SITE

- 5.6.9 The planning permission for Chelsea Farmers Market ([PP/16/04366](#)) was granted for a period of 15 years from November 2017 due to the safeguarding by Crossrail 2³⁰. As no formal decision has been reached over the route of Crossrail 2 by the Government yet, the safeguarding remains. The Council has verified this with the landowner's agents in September 2022. Therefore, the site is considered developable.

PUBLICATION POLICY

- 5.6.10 Chelsea Farmer's Market Site allocation was revised and the proposed Policy SA8 is as follows.

Policy SA8: Chelsea Farmer's Market

- A. The site will deliver high quality residential development with some retail.

Land use

- B. A minimum of 50 (C3) residential units.
C. Retail units at ground level facing 151 Sydney Street.
D. The creation of a new public square facing 151 Sydney Street and linking to Dovehouse Green.

Principles

- E. Provision of active retail frontages facing onto the new public square.

Infrastructure and Planning Contributions

- F. Development will be liable to making planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

³⁰ As stated in Condition 1 of the [Decision Notice for PP/16/04366](#).

5.7 UNITS 1-14 LATIMER ROAD INDUSTRIAL ESTATE

INTRODUCTION

- 5.7.1 The site comprises a series of one and a half storey industrial style buildings on the western side of Latimer Road, backing onto the railway to the east. The site lies in the northern part of the Freston / Latimer Road Employment Zone. The site area is 0.58 ha.
- 5.7.2 The site lies within the St Quintin and Woodland’s Neighbourhood Area and is subject to the St Quintin and Woodlands Neighbourhood Plan (SQWNP). The Plan identified the potential for the refurbishment or redevelopment of these units, and allocated the site for “*mixed use development, allowing housing use (C3) subject to ground and mezzanine floors remaining in commercial use (B1, B8, A or D class)*” as stated in Policy H2.
- 5.7.3 The site was also brought forward for allocation during the Call for Sites Round 1 – Issues Consultation.

EVIDENCE BASE

- 5.7.4 The site is the subject of a detailed design code³¹ which sets out the nature and scale of the development which the Council expects on site. The SPD provides a foundation for the principles of development as outlined in the new Policy.
- 5.7.5 RBKC housing trajectory³² reflects the content of the SQWNP (paragraph 9.5.5) and assumes delivery (over time) of 75 new housing units at this site. Retention of existing Class E floorspace at the ground floor is per Policy H2 of the SQWNP.
- 5.7.6 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding). The site lies inside the North Kensington Critical Drainage Area. The proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.7.7 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 5.7.8 As there is an extant planning permission for one of the units (PP/19/00991), the housing trajectory assumes 10 homes will be delivered in the next five years. The remaining are considered developable. Given the Council’s Design Code SPD for Units 1-14 Latimer Road, it is clear that the site can be developed for the numbers allocated.

³¹ RBKC, [Latimer Road SPD Design Code](#), October 2021.

³² RBKC, Five Year Housing Land Supply and Stepped Housing Trajectory, October 2022.

PUBLICATION POLICY

5.7.9 Policy SA9: Units 1-14 Latimer Road Industrial Estate is proposed as follows.

Policy SA9: Units 1-14 Latimer Road Industrial Estate

A. The site to deliver mixed-use development, providing:

Land use

B. A minimum of 75 homes on upper floors.

C. Retention of existing Class E at ground floor floorspace.

Principles

D. Active street frontage to Latimer Road.

E. Creation of a successful mixed uses street, combining a range of flexible Class E commercial and service uses with residential uses on upper floors.

F. High quality design that reflects the mixed character of the area and respects the employment zone identity

5.8 NEWCOMBE HOUSE

INTRODUCTION

- 5.8.1 The site is located at the corner of Notting Hill Gate and Kensington Church Street. It is adjacent to the Notting Hill Gate underground station. The site currently contains a number of linked blocks, a surface car park of 61 spaces, Newcombe Street and part of Uxbridge Street. The site comprises of Newcombe House, 207-237 Kensington Church Street, Royston Court and a surface level car park. The total site area is 0.5 ha.
- 5.8.2 The site was brought forward for allocation during the Call for Sites – Round 1 Issues Consultation.

EVIDENCE BASE

- 5.8.3 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. Therefore, the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.8.4 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.
- 5.8.5 Planning permission ([PP/17/05782](#)) was granted on appeal in June 2020 for *“demolition of existing buildings and redevelopment to provide office, residential, and retail uses, and a flexible surgery/office use, across six buildings (ranging from ground plus two storeys to ground plus 17 storeys), with two storey basement together with landscaping to provide a new public square, ancillary parking and associated works”*.
- 5.8.6 Following a change in the ownership of the site, the most recent representation from the current landowner received during the Regulation 18 Consultation notified the Council of their intentions to bring forward a commercial-led development, rather than residential-led. Given the change in emphasis in the balance of land uses being sought, greater flexibility has been built into the policy to ensure that any scheme which comes forward, can deliver a commercial-led scheme or a residential-led scheme.
- 5.8.7 Both uses are supported in a town centre location. Given the lawful use of Newcombe House is commercial, a large scale commercial scheme is suitable in land use terms on this site. At the same time a mixed use scheme with residential will help meet the housing needs of the Borough. In either scenario the existing social rent homes on the site at Royston Court must be re-provided in floorspace and units with policy requirement being to seek additionality.

- 5.8.8 The Notting Hill Gate SPD³³ sets out key development principles and guidelines for the whole Notting Hill Gate area, including Newcombe House. Improvements to public realm was identified as one of the key priorities for the area, which is reflected in the site allocation, including active frontages to the main streets.
- 5.8.9 Paragraph 3.6 of the Notting Hill Hate SPD also identified the need for a new primary healthcare centre in the area. Approximately 700 sqm of medical centre space formed part of the extant planning permission and was designed to respond to needs identified by the NHS West London Clinical Commissioning Group (CCG). The CCG has undertaken another exercise looking at the needs based on their patients list in the area. Initially the list was 18,000 patients but data cleaning to identify patients who no longer use the surgeries has been undertaken and the list is now 15,000 patients.
- 5.8.10 The CCG have used the national guidance on Facilities for primary and community care services³⁴ to cater to 15,000 patients. This has identified a need for approximately 650 sq m GIA of floorspace dedicated to medical facility (see Appendix A). The Notting Hill Gate SPD does not specifically state that the medical centre must be provided on the Newcombe House site, but this is the only known suitable location as identified by the CCG in the Notting Hill Gate area.
- 5.8.11 Until recently, the Farmers' Market operated in the car park at Newcombe House, serving as a popular destination for food shopping. It remains the aspiration of the Council to retain this important use within the area. Notting Hill Gate SPD identifies Newcombe House as one of the feasible locations in the area for the Farmers' Market to return to:
- "If possible the Saturday morning Farmers' Market will be relocated within Notting Hill Gate. Investigation has shown that the only feasible locations are as part of redevelopment of Newcombe House, West Mall behind Astley House; the car park behind Marks and Spencer and the service yard behind the units between Tesco and Marks and Spencer. These locations are being investigated with the landowners and the operators of the Market. Other options near Kensington High Street are also being considered"* (paragraph 3.3).
- 5.8.12 The Farmer's Market has currently relocated to Fox Primary School and an application is being considered for it to operate from Fox Primary School for the next two years. There are no other known sites in the Notting Hill Gate area where the Farmer's Market could operate from. Therefore, the site allocation includes this criterion to enable the flexibility should the market need the space in the future.

³³ RBKC, [Notting Hill Gate SPD](#), May 2015.

³⁴ Department of Health, [Health Building Note 11-01: Facilities for primary and community care services](#), 2013.

BUILDING HEIGHTS

- 5.8.13 The extant planning permission was granted for the erection of six buildings with heights ranging from 3 to 18 storeys. The approved building heights range mainly between 3 and 4 storeys above a two storey basement, but the permission also includes two taller buildings of 14 and 18 storeys, being 55.2 and 71.8 m from the ground floor to the top of the building respectively, with taller element of the scheme located on the junction of the Notting Hill Gate and Kensington High St. Considering the approved scheme, the site is deemed suitable for the tall building location. The maximum building heights are informed by the building heights parameters of the approved scheme.

INFRASTRUCTURE AND PLANNING CONTRIBUTIONS

- 5.8.14 The requirement to provide step-free access to the station concourse and the District and Circle Lines was identified within the Notting Hill Gate SPD and remains valid.

DELIVERABILITY OF THE SITE

- 5.8.15 The allocation does not assume any minimum number of homes given the current landowners are looking at a commercial led scheme which in land use terms is compatible with the town centre. No homes from this site are in the housing trajectory.

PUBLICATION POLICY

- 5.8.16 Policy SA10: Newcombe House is proposed as follows.

Policy SA10: Newcombe House

A. The site will deliver a high-quality residential led or office led mixed use development.

Land use

B. Refurbish or re-provide a minimum of 20 social rent homes and floorspace on-site with a requirement to provide additional community homes as per Policy HO3.

C. High quality office employment space, including large, flexible office floor plates that will meet diverse local occupier requirements.

D. Retail and leisure uses, at ground level bringing active frontages to the ground floor.

E. A new medical centre / GP surgery of a minimum 650 sq m GIA.

F. A new accessible, permeable and inclusive public square with level access through the site.

G. A dedicated space for a Farmer's Market to return and operate.

Principles

H. A high quality vibrant new public realm.

I. No building on the site to exceed 72 m from ground level to the top of the building.

Infrastructure and Planning Contributions

J. The delivery of step free access from street level to the southbound platform of the Circle and District Line of Notting Hill Gate Underground Station through new lifts and walkways partially within the site.

K. Development will be liable to making planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

5.9 THE PLAZA, 535 KING'S ROAD

INTRODUCTION

- 5.9.1 The site is situated on the boundary with the London Borough of Hammersmith and Fulham at the western end of King's Road. It is bounded by Council owned land used as a Highways depot and Salt Store on the western boundary, Lots Road to the East, King's Road to the north and residential buildings to the south. The site comprises a part three, part four, part five storey commercial building constructed in the late 1980s and is currently used for offices.
- 5.9.2 The site was brought forward for allocation during the Call for Sites – during the Issues Consultation in 2020 as a site potentially suitable for mixed-use development. The site currently comprises 5 storey office building, located in the Lots Road Employment Zone. It was suggested that the site could potentially be comprehensively redeveloped for commercial or residential development.
- 5.9.3 The Council initially dismissed the site being suitable for allocation due to the office uses being protected from loss under the Policy CF5. In addition, the site falls within the area where 21m threshold applies for a tall building definition (Tall building threshold Paper, February 2022) and was not identified as a suitable location for a tall building, i.e. higher than 21m. The decision was also informed by the opposition from the local community to the proposed building heights within the draft Lots Road South Design Brief SPD for Lots Road South Site, which is in a close proximity to the Plaza. As such, the site did not seem to have capacity for further optimisation. It was also noted that the site currently benefits from planning permission for refurbishment to include some additional floorspace through upward extension and as such site allocation was not considered necessary to bring this forward.
- 5.9.4 The decision has been challenged by the landowner within the Regulation 18 Consultation, requesting to reconsider the site for allocation considering opportunities for re-model, part-extension or comprehensive redevelopment of the site. In response, the Council reconsidered the site by undertaking a high-level design led capacity assessment which is outlined in paragraph 6.1.6. below and it was agreed to include the site for allocation.

EVIDENCE BASE

- 5.9.5 According to the Sequential Test, the site falls predominantly within Flood Zone 1 (low risk of flooding), with part of the site (32%) located in Flood Zone 2 of the River Thames. The site is benefitting from the flood defences of the River Thames and tidal breach modelling shows that the site is not at risk of flooding should a breach of the tidal flood defences occur. The risk of flooding is therefore considered to be at low. The site is also outside a Critical Drainage Area. Therefore, the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 5.9.6 The site is located within the Lots Road Employment Zone, where a strong demand for office and industrial floorspace was identified by the latest Employment Land Study³⁵. The Study also indicated that further residential integration is unlikely to harm the employment offer within the Zone as long as commercial floorspace levels are maintained (paragraph 7.29). Therefore, it is expected that any proposal would retain or re-provide the existing quantum of office / business floorspace in line with the Local Plan Policy protecting business uses from the loss.
- 5.9.7 The proposed quantum of residential development is based on a high-level design led capacity assessment undertaken by the Council. The site is not identified as a suitable location for a tall building and falls within an area where a 21m height threshold applies. This height limit served as one of the main considerations when calculating potential additional capacity over and above the retained office use on the site. For the purposes of the site capacity exercise, a taller 7 storey block to the northwest corner of the site (which would have 5-storeys of residential with 4 units per storey) and a 4-storey block to the northeast corner of the site (which would have 2 storeys of residential with 4 units per storey) were assumed suitable, given the local and wider site constraints. This configuration would yield a total of 28 residential units and was taken as the minimum requirement for quantum of residential use on this site.
- 5.9.8 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 5.9.9 As there is no extant planning permission or relevant planning history, the site is considered developable.

³⁵ RBKC, Employment Land Study, October 2021.

PUBLICATION POLICY

5.9.10 Policy SA11: The Plaza, 535 King's Road is proposed as follows.

Policy SA11: The Plaza, 535 King's Road

A. The site will deliver a high quality mixed-use development.

Land use

B. Retention of the existing office / business use floorspace.

C. A minimum of 28 (Class C3) residential units.

Principles

D. Provision of active retail frontages facing Lots Road and/King's Road should be explored.

Infrastructure and Planning Contributions

E. Development will be liable to making planning contributions in accordance with the CIL Regulations and other relevant Local Plan policies and SPDs.

6 SMALL SITES

6.1 HARRINGTON ROAD CAR PARK

INTRODUCTION

- 6.1.1 The site sits on the corner of Harrington Road and Queen's Gate to the north and west, Reece Mews to the east; the southern site boundary is bordered by the Church of St Augustine which is listed grade II*. It was previously occupied by a stuccoed terrace on Queen's Gate; fire damage in the late 1980s led to the building being demolished. The site is currently used a car park with access from Harrington Road adjacent to the entrance to Reece Mews. The site has remained undeveloped and has been used as a temporary car park for a number of years.
- 6.1.2 The site was allocated through Policy CA8 of the Local Plan 2019 for a residential-led development which could include some commercial floorspace. The full policy is set out below.

Policy CA8: Harrington Road

A residential-led development which could include some commercial floorspace. The Council allocates development on the site to deliver, in terms of:

Land use

- a. a minimum of 50 residential (C3) units;

Principles

- b. active street frontages to Harrington Road;
- c. an appropriate setting for the adjacent listed St Augustine's Church;
- d. development that positively contributes to the character and appearance of the Queen's Gate Conservation Area;
- e. development of a scale and density that is appropriate to its surroundings;

Infrastructure and Planning Contributions

- f. development will be liable to make planning contributions in accordance with the CIL Regulations, the Council's Regulation 123 List and other relevant Local Plan policies and SPDs

- 6.1.3 Since the adoption of the current Local Plan, the site has not been developed yet and therefore it is considered appropriate to carry forward the allocation in the NLPR.

EVIDENCE BASE

- 6.1.4 Proposed quantum of development, principles and infrastructure contributions as outlined per existing Site Allocation Policy CA8 all remain relevant and therefore are carried forward without changes into the new policy. References to development complying with design and conservation policies were removed as it is an expectation for any development in the Borough to address the existing context and positively contribute to the character of the Conservation Areas.
- 6.1.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. Therefore, the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 6.1.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 6.1.7 The site is in the ownership of the Islamic Republic of Iran. There is no prospect of any development on the site in the near future. Nevertheless, this is a development site in a well-established Central London area. Therefore, it is considered developable.

PUBLICATION POLICY

- 6.1.8 Policy SA12: Harrington Road Car Park is proposed as follows.

Policy SA12: Harrington Road Car Park

A. The site will deliver a high-quality residential-led mixed use development.

Land use

B. A minimum of 50 (Class C3) residential units.

C. Class E Commercial frontage to Harrington Road at ground floor level.

6.2 EMMANUEL KAYE BUILDING

INTRODUCTION

- 6.2.1 The site is located on the corner of Manresa Road and King's Road, adjacent to Chelsea Fire Station and Henry Moore Court. It has been occupied by the Thrombosis Research Institute and National Heart and Lung Institute since 1989. The site comprises of a single 3 storeys building.
- 6.2.2 The site was brought forward by the landowners for allocation during the Call for Sites –Issues Consultation in 2020 as a site potentially suitable for mixed-use development to provide new office, laboratory and other academic and research facilities alongside residential use. The residential use would facilitate the provision of research facilities on site.

EVIDENCE BASE

- 6.2.3 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding) and it is outside a Critical Drainage Area. Therefore, the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 6.2.4 The Imperial College London maintains an interest in the Ground Floor of the Emmanuel Kaye building, as well as part of the first floor, for medical research and development. The College submitted a representation during the Regulation 18 Consultation, which highlighted the importance of retaining this existing medical research facility floorspace on site due to its close proximity to the Brompton Hospital, the largest specialist heart and lung centre in the UK. Considering the importance of this facility and public benefits it brings, it is expected that as a minimum, existing medical research facility use class and floorspace will be retained. The Council would also support and welcome further expansion of the facilities if proposed.
- 6.2.5 The proposed quantum of residential development is based on a high-level design led capacity assessment undertaken by the Council. The site is not identified as a suitable location for a tall building and falls within an area where a 21m height threshold applies. This height limit served as one of the main considerations when calculating potential additional capacity over and above the retained commercial use at ground floor and the retained medical research use at 1st and 2nd floors. For the purposes of the site capacity exercise, it was assumed that an additional 3 storeys could be accommodated over and above the retained existing uses at ground to 2nd floor, given the townscape and heritage constraints. This could potentially provide a ground +5 storey building with 4 residential units at 3rd floor, 4 residential units at 4th floor and 2 residential units at 5th floor. This configuration would yield a total of 10 residential units and was taken as the minimum requirement for quantum of residential use on this site.
- 6.2.6 Active frontage on King's Road and Manresa Road would positively contribute to the vitality of King's Road Town Centre and therefore is considered reasonable requirement.

- 6.2.7 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 6.2.8 As there is no extant permission or relevant planning history, the site is considered developable.

PUBLICATION POLICY

- 6.2.9 Policy SA13: Emmanuel Kaye Building is proposed as follows.

Policy SA13: Emmanuel Kaye Building

- A. The site will deliver a high-quality mixed use development.

Land use

- B. A minimum of 10 (Class C3) residential units.
C. As a minimum retain existing medical research facility use class and floorspace.

Principles

- D. Active frontage on King's Road and Manresa Road

6.3 142A HIGHLEVER ROAD

INTRODUCTION

- 6.3.1 The site is located at the back of the row of terraced houses on the junction of Highlever Road and Dalgarno Gardens. Irregular in shape and approximately 0.12 ha in size, the site has been in use as a garage workshop and filling station since 1918. The site has two vehicular entrances, from Highlever Road and Dalgarno Road.
- 6.3.2 The site lies within the St Quintin and Woodland's Neighbourhood Area and is subject to the St Quintin and Woodlands Neighbourhood Plan (SQWNP). The Plan identified the potential for the development of the site and allocated it for housing use as stated in Policy H1.
- 6.3.3 The site was also brought forward for allocation during the Call for Sites Issues Consultation in 2020.

EVIDENCE BASE

- 6.3.4 The St Quintin and Woodlands Neighbourhood Plan identifies the potential to accommodate up to 10 residential homes on site, *“subject to a housing scheme being low rise and not creating an unacceptable “sense of enclosure” for immediate neighbours”*. The site lies within the Oxford Gardens Conservation Area and is surrounded by low rise two-storeys terraced dwellings. Within this context, taller elements and higher density would not be considered appropriate and therefore the site is allocated for a minimum of 6 housing units.
- 6.3.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding). However, it is inside a Critical Drainage Area. In accordance with the application of the sequential test for Local Plan preparation (paragraph 020 of the NPPG) the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 6.3.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 6.3.7 The site is considered deliverable given its very small nature.

PUBLICATION POLICY

- 6.3.8 Policy SA14: 142A Highlever Road is proposed as follows.

Policy SA14: 142A Highlever Road

Land use

- A. A minimum of 6 (Class C3) residential units.

6.4 COLEBROOK COURT

INTRODUCTION

- 6.4.1 The site is located in a northern part of a small urban block located between Sloane Avenue to the north and Lucan Place to the south. The Site comprises a single storey Sainsbury's retail store with three levels of private residential accommodation (comprising 12 units) situated above. The site is not listed and is outside any conservation area.

EVIDENCE BASE

- 6.4.2 The site was brought forward by the landowner for allocation during the Call for Sites Issues and Options Consultation in 2021 as a site potentially suitable for mixed-use development to provide commercial and residential uses.
- 6.4.3 The proposed quantum of residential development is based on a high-level design led capacity assessment undertaken by the Council. The site is not identified as a suitable location for a tall building, but it falls within an area where a 30m threshold applies for a tall building definition. This height limit served as one of the main considerations when calculating potential additional capacity over and above the retained commercial use at ground floor. For the purposes of the site capacity exercise, it was assumed that an additional 6 storeys could be accommodated over and above the retained existing commercial use at ground floor, given local and wider townscape constraints. This could potentially provide a ground +6 storey building with 4 residential units each at 1st – 4th floor levels, 3 residential units at 5th floor and 1 residential unit at 6th floor. This configuration would yield a total of 20 residential units and was taken as the minimum requirement for quantum of residential use on this site.
- 6.4.4 Part of the site lies within the Sloane Avenue Neighbourhood Centre, with ground floor currently being in use by Sainsbury's retail store. Council's existing and draft Local Plan policies support the provision of a diverse range of town centre uses within the town centres and seek to protect the ground floor uses specifically in order to ensure the success and vitality of these town centres. As residential uses are not supported in the town centres on the ground level, a requirement to provide Class E (retail) on the ground floor is considered appropriate for this site.
- 6.4.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding). However, it is inside a Critical Drainage Area. In accordance with the application of the sequential test for Local Plan preparation (paragraph 020 of the NPPG) the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 6.4.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 6.4.7 As there is no extant planning permission or relevant planning history, the site is considered developable.

PUBLICATION POLICY

- 6.4.8 Policy SA15: Colebrook Court is proposed as follows.

Policy SA15: Colebrook Court

Land use

- A. A minimum of 20 (Class C3) residential units.
- B. Class E (Retail) on the ground floor.

6.5 HOLLAND ROAD TRIANGLE

INTRODUCTION

- 6.5.1 The site lies to the south of the Holland Park Roundabout, is triangular in shape, approximately 0.015 ha. The site is currently open land with cycle hire facility located on the southern side of the site.
- 6.5.2 Would need to be integrated with new development or relocated.

EVIDENCE BASE

- 6.5.3 The site was brought forward by the landowner TfL for allocation during the Call for Sites Issues Consultation in 2020 as a site potentially suitable for residential development of approximately 45-50 homes.
- 6.5.4 The proposed quantum of residential development is based on a high-level design led capacity assessment undertaken by the Council. The site is not identified as a suitable location for a tall building and is not considered an area where the taller 30m (London Plan) building height threshold for tall buildings applies. This height limit served as one of the main considerations when calculating the potential capacity on the site in addition to townscape and heritage constraints. These factors have fed into the capacity calculations for the site and a minimum 30 residential units was deemed a suitable quantum.
- 6.5.5 According to the Sequential Test, the site falls within Flood Zone 1 (low risk of flooding). However, it is inside a Critical Drainage Area. In accordance with the application of the sequential test for Local Plan preparation the proposed development is compatible with the flood zone and the Sequential Test is deemed to be passed. The Exception Test is not required, therefore the development is in an appropriate location under the NPPF flood risk policy.
- 6.5.6 The IIA indicated specific mitigation / enhancement measures that would help to address the various IIA objectives. These can be found in the Appendix B – Site Assessments.

DELIVERABILITY OF THE SITE

- 6.5.7 As there is no extant planning permission or relevant planning history, the site is considered developable.

PUBLICATION POLICY

- 6.5.8 Policy SA16: Holland Road Triangle is proposed as follows.

Policy SA15: Holland Road Triangle

Land use

- A. A minimum of 30 (Class C3) residential units.

SUMMARY OF ALL EVIDENCE

Date	Document	Organisation
Sep 2019	Local Plan	RBKC
Nov 2017	The London Strategic Housing Land Availability Assessment 2017	Mayor of London
Mar 2021	The London Plan	Mayor of London
Oct 2022	New Local Plan Review: Site Allocations Paper	RBKC
Oct 2021	Employment Land Study	RBKC
Nov 2021	Royal Borough of Kensington and Chelsea: The Retail and Leisure Needs Assessment	Urban Shape and Hatch
Feb 2022	Royal Borough of Kensington and Chelsea: Character Study	Arup
Oct 2022	Heritage Impact Assessments for Draft Local Plan Site Allocations	RBKC
Oct 2022	Royal Borough of Kensington and Chelsea Level 1 Strategic Flood Risk Assessment	JBA Consulting
Oct 2022	Flood Risk Sequential Test	RBKC
Oct 2022	Royal Borough of Kensington and Chelsea Local Plan: Viability Study	BNP Paribas Real Estate
Oct 2022	Royal Borough of Kensington and Chelsea: Local Plan Review Integrated Impact Assessment	WSP
Oct 2022	Infrastructure Delivery Plan	RBKC
Jan 2022	Facilities Planning Model Assessment of Swimming Pools Provision in Kensington and Chelsea	Sport England
Jan 2022	Facilities Planning Model Assessment of Sports Halls Provision in Kensington and Chelsea	Sport England
Apr 2019	Local Implementation Plan	RBKC
Nov 2021	Leadership Team Meeting Report: Approval to progress proposals for Council owned land in the Lots Road area	RBKC
Jan 2008	Warwick Road Planning Brief SPD	RBKC
Nov 2009	Wornington Green Planning Brief SPD	RBKC

Date	Document	Organisation
Sep 2022	Lots Road South Design Brief SPD	RBKC
Mar 2015	Trellick-Edenham Planning Brief SPD	RBKC
Apr 2021	Royal Brompton Hospital SPD	RBKC
Oct 2021	Latimer Road SPD Design Code	RBKC
May 2015	Notting Hill Gate SPD	RBKC
Oct 2022	Five Year Housing Land Supply and Stepped Housing Trajectory	RBKC
Oct 2022	Tall Buildings Threshold	RBKC
Jul 2018	St Quintin and Woodland's Neighbourhood Plan	St Quintin and Woodland's Neighbourhood Forum
2013	Health Building Note 11-01: Facilities for primary and community care services	Department of Health

7 OPTIONS, CONSULTATION AND INTEGRATED IMPACT ASSESSMENT

7.1.1 Alternative options were consulted on as part of the borough Issues (September 2020) and Issues and Options (July 2021) consultation documents. The Consultation Schedules and Consultation Summaries for these are set out in the Consultation Statement published alongside the Regulation 19 Publication Policies (October 2022) consultation document. Consultation responses have been reviewed and used to inform the development of, and modification to, the draft NLPR Policies.

7.1.2 A breakdown of the public consultations undertaken by RBKC to inform the production of the NLPR is set out in the table below.

Public Consultation	Timeframe
Borough Issues Consultation	29 September – 10 November 2020
Issues and Options Consultation	26 July – 4 October 2021
Regulation 18 Draft Policies	9 February – 23 March 2022
Regulation 19 Publication	October 2022

Figure 1: RBKC NLPR Consultation Timeline.

7.1.3 The options considered through the consultations and within the Integrated Impact Assessment (IIA) are summarised below.

7.1.4 The Council has considered the options particularly in light of the ‘tests of soundness’ which are set out in the NPPF:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs³⁶; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

³⁶ Footnote 21 of the NPPF - Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of this Framework.

7.1.5 All options and alternatives considered for site allocation designation are outlined in a separate Sites Allocations Paper³⁷. The paper provides details on how sites have been selected for inclusion as sites allocations and outlines the Sites Assessment Methodology that was followed.

7.2 PROPOSALS MAP

7.2.1 Related to the Publication Policies, the following changes are required to be made to the Key Diagram and the Proposals Map:

- **Update the site allocations. Delete two parts of the CA5 Warwick Road Sites (Former Empress Telephone Exchange and Homebase Site) and CA6 Lots Road Power Station.**
- **Amend the boundary of CA2 Wornington Green site so it only includes Phase 3.**
- **Include the following eight new sites:**
 - **Lots Road South;**
 - **Units 1-14 Latimer Road Industrial Estate;**
 - **Newcombe House;**
 - **The Plaza at 535 King's Road;**
 - **Emmanuel Kaye Building;**
 - **142A Highlever Road;**
 - **Colebrook Court;**
 - **Holland Road Triangle.**

³⁷ RBKC, New Local Plan Review Site Allocations Paper, September 2022.

8 DUTY TO COOPERATE AND STRATEGIC ISSUES

- 8.1.1 The legal obligation of the ‘duty to cooperate’ requires the Council to “engage constructively, actively and on an ongoing basis” and have “regard to activities” (i.e. strategies, plans, policies) of other bodies in the preparation of Local Plans “so far as relating to a strategic matter”. This includes “considering whether to consult on and prepare... agreements or joint approaches”³⁸.
- 8.1.2 A “strategic matter” relates to “sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular in connection with infrastructure that is strategic”³⁹. Strategic matters are further defined in paragraph 24 - 27 of the NPPF⁴⁰ and paragraph 009 - 017 of the PPG on maintaining effective cooperation⁴¹.
- 8.1.3 Figure 3 shows the actions the actions the Council has taken with regard to the duty and the relevant prescribed bodies.
- 8.1.4 The Council has prepared a statement ground which sets out where we are in agreement with neighbouring authorities. This will be amended as and when appropriate.

Strategic issue	Relevant prescribed bodies ⁴²	Council actions Prescribed bodies’ strategies, plans and policies which the Council has had regard to
All	The Council has had regard to all relevant strategies, plans and policies of the relevant prescribed bodies in preparing the policies – as set out in Legislation, Policy and Guidance sections of Policy Formulation Reports (PFRs)	Ongoing
All	New Local Plan Review Issues consultation – see Consultation Schedule	Sept. to Oct. 2020
All	New Local Plan Review Issues and Options consultation – see Consultation Schedule	Jun. to Oct. 2021

³⁸ Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by Section 110 of the Localism Act 2010.

³⁹ Section 33A(4) of the Planning and Compulsory Purchase Act 2004, as inserted by Section 110 of the Localism Act 2010.

⁴⁰ [MHCLG, National Planning Policy Framework \(NPPF\), July 2021.](#)

⁴¹ [DLUHC, MHCLG, Planning Policy Guidance, October 2021.](#)

⁴² Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Strategic issue	Relevant prescribed bodies ⁴²	Council actions Prescribed bodies' strategies, plans and policies which the Council has had regard to
All	New Local Plan Review Regulation 18 Draft Policies consultation – see Consultation Schedule	Feb. to Mar. 2021

Figure 2: Duty to cooperate strategic issues, prescribed bodies and Council action.

Appendix A – Calculated need for medical facility floorspace for SA10 Newcombe House

CCG Calculations for a need for approximately 650 sq m GIA of floorspace dedicated to medical facility for Newcombe House site allocation. This is based on the needs for 15,000 patients; assumptions regarding the size and number of units required for this number of patients based on the [Health Building Note 11-01: Facilities for primary and community care services](#).

Functional space	Quantity	Unit of space	Total space (sq m)
Entrance	1	8	8
Waiting area - 30 people	1	1.5	45
Reception - 2 person	1	5	10
Patient records	0	20	0
Baby Feed	1	5	5
Nappy Change	1	5	5
WC - Patient	3	4.5	13.5
Interview Room	3	8	24
Consulting Room	10	16	160
Store	2	5	10
Treatment Room	3	16	48
Minor Surgery	0	20	0
Clean Utility	1	8	8
Dirty Utility	1	8	8
Office - Single person	1	8	8
Admin/offices - 6 person	1	6.5	39
Quiet Room/1:1 space	1	6	6
Open Plan for Health & Social Care Teams - 6 person	1	6.5	39
Staff Room	1	20	20
MDT/ Meeting Room	1	20	20
WC - Staff	3	4.5	13.5
Cleaners room	1	5	5
Waste Disposal	1	8	8
Comms/IT	1	4.5	4.5
Sub total			495
Circ - 20%			99
Sub total			594
Planning - 3%			17.82
Plant -5%			29.7
Clinical Gross			641.52



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

www.rbkc.gov.uk/planningpolicy