



Appendix C

REG 18 DRAFT POLICIES CONSULTATION

Summary of Comments received

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1. Introduction

Policy V1: Vision for the Borough

Q.1. Comments on the proposed vision for the Borough.

Comments were made by 49 consultees, relating to the proposed vision or to the proposed Local Plan more generally.

There was a high level of support for the different parts of the vision, with no objections to any elements per se. However, a number of comments were made suggesting changes/ omissions/ wrong emphasis.

The GLA and LBHF raised no objections to the proposed vision.

Inclusive

The ambition to narrow inequality, through the provision of truly affordable homes, employment opportunities and provision of a range of social and sports facilities was welcomed. However, the following comments were raised:

- Need to be more explicit about priority for housing delivery as part of creating mixed and diverse communities
- Need to recognise that the provision of truly affordable homes will not necessarily lead to an inclusive society, or meet our housing needs.
- Need to make specific reference to increasing access to education as a way to reduce inequality.
- Need to make specific reference to north Kensington – and the promises made to the community. The Council needs to acknowledge the harm done by the council's actions leading up to the Grenfell disaster and its commitment to repair the damage.
- Need to include a way to objectively monitor the success in achieving “inclusivity”.
- Need to make specific reference to narrowing health inequalities and of a “heathy borough”.

Green

Support for the environment being put in the heart of new development.

- Need not to play lip service and to be robust and require carbon neutral development and renewable energy.
- Public transport improvements will be a central part of this.
- Support for cycle lane and increased walkability
- Of particular importance in North Kensington where open space at a premium.
- Support for reference to SuDS and the need to minimise flood risk. Reference to Thames Tideway Tunnel to be added to vision.
- Support renewable district heat and power for Athlone Gardens and Earl's Court.

Liveable

- Provision of a range of social and community uses and promotion of the walkable neighbourhood key, and central to the creation of a “liveable” borough. (5)
- Concern that keeping life local removed as a chapter as may reduce emphasise on liveability.
- Should note that both district and neighbourhood centres have a role to play in the support for the walkable neighbourhood. (2)
- Need specific reference to Imperial college as an institution which contributes to “liveability”
- Need flexibility in relation to offices and changing working patterns
- Support aspiration within vision to develop the borough’s cultural offer and support its theatres.
- Need specific reference to the need to promote heritage and conservation and the need to respect unique character of the borough, streetscapes, high quality design etc. This should be an additional strand of the vision.

Other comments

- Those with a particular interest in Lots Road (4) were very concerned that the plan had an overemphasis on the provision of additional homes rather than looking after the needs of those who already live here. This will lead to the degradation of the Lots Road Employment Zone and to an approach which does not recognise the importance of supporting the economy/ employment

opportunities. The press for new homes will also lead to over development within Lots Road, counter to all the of the parts of the vision.

- Over development of Lots Road area

In this vein there is no proper assessment of the wider infrastructure needs created by the provision of new homes.

- Need to balance needs of residents and businesses (King's Road)
- Electric scooters unsafe
- Objection to tall buildings, do not improve liveability
- Need to make reference within vision to role that OAs have in meet needs for new homes and commercial development (TfL)
- One consultee questioned the integrity of Council, its officers and Cllrs and the Grenfell Tower disaster, questioning the desire for real change.
- Concern over changes to PD rights (additional storeys)
- Presumption in favour of sustainable development – suggestion that reference to new development “not being allowed at any cost” should be removed.

Q.2. Do you have any other comments on Chapter 1?

- Over emphasis on the desire to meet our housing targets. The council must “demand” a review of our housing targets
- Welcome explanation of neighbourhood plans and the relationship between a NP and a Local Plan
- Question concept of ordered hierarchy of town centres
- Need to reflect post covid changing patterns of work
- High trip generators should only be located in highly assessable locations
- The council should not resist the provisions of the E class and the PDR of E to residential.
- The plan is too timid and unconvincing
- The policies in the plan must be taken into account when decisions are made. This must be done in a transparent manner.

- Need more resources/ guidelines to consider access (disability), to allow residents who want to remain at home to be able to do so.
- South Kensington Station redevelopment would help the Council achieve its vision.
- Support for walkable neighbourhoods, and need for balance between local pedestrians, drivers and other road uses.
- 6 week consultation period too short and a barrier to true inclusive community participation
- Support for recognition of need for social rented homes rather than homes that are not truly affordable.
- Early review not as a result of the Council adopting new values following the Grenfell Tower Tragedy but a way to promote housing over all other uses, particularly with reference to the Lots Road Employment Zone.
- Over emphasis on the provision of new homes and the watering of the role of our Employment Zones (in particular Lots Road).

2. Places

PLV1: Kensal Canalside

- 14 responses were received relating to the Kensal Canalside Vision. These included a request that the vision includes infrastructure improvements from LBHF but largely focussed around the vision seeming unrealistic in its desire to deliver a connected place given the road access and the lack of an Elizabeth Line station.
- There was a suggestion that the vision should include the decking of the railway
- DfT request greater emphasis is given to housing delivery on the site
- 2 comments requested that focus be given to retrofitting Canalside house and providing better space for community users
- Sports England request that reprovision of sports/recreation is included – outdoor water centre
- Request that the local plan is consistent with the SPD from the landowners, particularly in relation to tall buildings, overlap with comments for the site allocation (see below)
- A desire for the focus to be on affordable or community housing has also come through in the comments and for taller buildings not to be supported here.

PLV2: Earl's Court

- 14 responses from 13 respondents were received relating to the Earl's Court vision.
- Additional infrastructure requirements were put forward, including a new public space above the Earl's Court station, a Piccadilly/West London Line interchange station,
- There were concerns that there was a lack of detail in the vision and a lack over overlap and interweaving between the vision for this site and the Earl's Court Road Centre.
- It was stated that the approach to culture on the site could be more flexible, rather than considering a single facility. The importance of culture was highlighted as an important opportunity. The developer queried the

requirement for the cultural facility to be a single facility rather than multiple locations.

- Representations from the developer, ECDC, and from TfL (in their capacity as part of ECDC) queried the need to link the development with Earl's Court Road, given their intention is for a new development to be a destination. They also emphasised the need to optimise the opportunity and to consider the wider site as a whole, not just look at the RBKC part in isolation.
- LBHF stated they would work with RBKC on this site to optimise the site in terms of homes and jobs, create a highly sustainable new neighbourhood that responds to and is integrated (socially and physically) with its wider context. Their representation highlighted the importance of connectivity across the opportunity area.
- Cllr Wade raised a number of issues relating to improved junctions, pedestrian and cycle permeability in the area, and suggested commercial space be new creative workspaces as part of a wider Earl's Court enterprise zone.

PLV3: Lancaster West Estate and wider area

- 8 responses have been received including one from the Silchester Residents' Association questioning what is signalled by the term "wider area" and commenting that the vision only covers the Lancaster West Estate. They comment that the Lancaster West Neighbourhood Team does not engage with residents outside of the Lancaster West Estate. There is no mention in the New Local Plan of Silchester Estate which has suffered the same trauma as the Lancaster West Estate. Comments are made to rewrite this section to include a vision for Silchester Estate/Notting Dale ward. Some of the comments such as upgrading buildings are a housing management issue.
- One resident has suggested that the Council produce a Notting Dale Future Neighbourhood Vision instead of the limited and divisive LW Future Neighbourhood Vision.

PLV4: The Westway Vision

- 9 responses were received generally in support of the vision for the Westway being included. These included one from the Westway Trust wishing to be specifically mentioned in being a key partner for the CEZ creation and recognising that commercial providers should not get as much emphasis for delivering affordable workspace but there is great benefit in delivering space without making a commercial purchase.

- Request to include the Westway's Good Growth Fund work to improve the east/west pedestrian/cycle route including the underpass.
- It was requested by Sport England that the retention of sports and leisure facilities is included in the vision.
- There were requests that the council includes a commitment to mitigating air pollution from the Westway.
- Mention was made about including the aspiration and plans for a WLL station at Westway Circus.
- Concerns were raised about the potential gentrification of the space under the Westway and the need to emphasises local jobs for local people here with affordable space.

Optimising employment areas

- Comment was made suggesting that a review of the locations and boundaries of the boroughs employment areas would be beneficial given the time that has passed and their importance.
- The GLA make note that the employment zones are mapped as LSIS land in the 2010 and 2015 baselines and supports the potential to have a CEZ accreditation in the borough with further clarification needed on the process and outcome of which is still yet to be determined.
- A number of comments question the changing nature of employment zones and suggest that the employment might be undermined by the housing pressures.

PLV5: Kensal Employment Zone Vision

- Few comments were received regarding the employment zone vision with reference largely being made to increased connections and the role of and approach to employment space more generally.
- A desire for community and social enterprise to play a larger role.

PLV6: Freston/Latimer Road Employment Zone Vision

- A desire for community and social enterprise to play a larger role.

- Concerns that Latimer Road Preservation Group were not notified separately and received the document late. Concerns the neighbourhood forum is not representative.
- General support for the industrial units rather than residential optimisation.
- The ST Quintin and Woodlands Neighbourhood Forum however comment that whilst the vision is appropriate for the Freston Road part the wider EZ could be removed from designation.

PLV7: Lots Road Employment Zone Vision

- 11 responses were received regarding the vision for the employment zone. Overall there is support for the vision, coupled with scepticism that this will be undermined by the introduction of residential uses, in particular in relation to the Lots Road South allocated site and the quantum specified in that allocation. There is resistance to a large volume of housing harming the realisation of the vision for the Employment Zone.
- Protection and enhancement of the Employment Zone for commercial activity is raised in a large number of responses.
- There is support from LBHF for the vision and an offer to collaborate on a design guide.

PLV8-18: Our Larger Town Centres

- General support for the town centres was given with some amendments/clarifications requested particularly around adding detail to ensure change is still welcomed outside of these areas.
- A number of comments were made around the Earl's court vision with a desire to have a shopfronts design guide and ensure that local life is a focus for the high street rather than generic takeaways etc. Serving a wider population with less reliance on chains and more support for local SME's. Noted that the Earl's Court centre is a gateway to the borough and there is a desire to overcome the current pollution levels.
- Support for the vision to include reference to the EC opportunity Area potential for growth and to ensure it benefits from it.
- Desire for Earl's court to have community meeting space and a business support hub to be situated at the library.

- Some concern on residents thoughts to ‘evening economy’ and loss of residential character to neighbouring streets of High Streets.
- Clarification of information within the town centres requested with some additions to detail of the town centres with particular reference to imperials relationship to South Kensington, adding culture into the principles for South Kensington, residents needs to Kings Road East, growth of jobs and homes in Kings Road East, clarification on powers around use class E and desires to reduce chain stores generally which may sit outside of the planning regime.
- Requests from TFL for clarifications on transport/wayfinding points as well as encouraging the inclusion of cycle routes in Kensington High Street and clarification on development at Knightsbridge.
- Request to potentially extend Brompton Cross to align with new development
- Suggestion that Notting Hill Gate is recognised as an important local shopping location with farmers market.
- Requests to remove specific sections of South Kensington Station from ‘significant public buildings’ including the bull nose and Thurloe Street. Concern raised as to the vagueness of the vision and the potential development opportunity here including comment from TFL on positive wording and the renewal needed to continue its CAZ role.

PLV19: Keeping Life Local – Walkable Neighbourhood

- Comments are generally supportive with comments received from the GLA , NHS North west London CCG and Sport England with one comment suggesting it be 10 minute walk.
- A suggestion that this section would be better located at the beginning of chapter 2 as walkable neighbourhoods should drive the vision for all places.

Other comments

- Danger of overcrowding north ken – desire for homes to go to local people not foreign investors.
- Note by Woodland trust that policies are set out to achieve housing figures with a request made that the borough set a borough wide target for tree canopy cover.
- Suggestion that the NLPR has an overreliance on larger more complex sites.

- A request from Royal Brompton Hospital to be viewed as a growth area and enter discussions with the council for allocation.
- Further detail on maps/ labelling requested.

3. Site Allocations

Site allocation SA1: Kensal Canalside Opportunity Area

Q.5. Please provide your comments on the proposed site allocation.

- Comments on draft policy SA1 were received from 43 stakeholders. Respondents included a number of residents associations (RAs); the Labour Group of Councillors; TfL, the GLA and Mayor of London; London Borough of Brent and London Borough of Hammersmith and Fulham; the Environment Agency and the Woodland Trust; Historic England; individual residents; developers and planning agents.
- 19 respondents objected to ‘a minimum of 3,500 new homes’ and considered it too high taking into account the low PTAL Levels in the area, scrapped plans for Crossrail station, little evidence to indicate that the introduction of an Elizabeth Line station within KCOA is a realisable prospect and general lack of transport infrastructure. More thought and further details regarding transport links were encouraged. Moreover, Department for Transport noted that no new safeguarding direction can be robustly supported due to the lack of robust evidence to support the safeguarding of land for a new station which could undermine the development potential of the KCOA.
- Some respondents also objected to the requirement to provide 10,000sqm of commercial space and considered it an excessive quantum of workspace which exceeds the actual need for workspace on this site and is not of proportionate scale for a Neighbourhood Centre.
- Building heights and impact of tall buildings on the setting of Grand Union Canal were of great concern to 9 respondents. Some respondents strongly objected to building any higher than 20 storeys and that the proposed heights of up to 31 storeys are lacking in justification. It was suggested that sitewide building heights strategy should be redrawn to identify a range of sites with a reduced range of heights from 6 to 20 storeys and more consideration for mid-rise high-density development.
- London Borough of Brent has welcomed the contents of the Opportunity Area Heights Analysis Draft Report February 2022 by Urban Initiatives Studio noting that the draft policies consultation document appears to bear no relation to the content of the Urban Initiatives work. It was suggested that that Regulation 19 of the Plan would build on and incorporate this evidence base document into the draft policy and mapping. On the contrary, Ballymore Group and Sainsbury’s Supermarkets Ltd, and St William LLP expressed their concerns regarding UI work and noted that given the limitations of the study, it cannot be considered as a template or as a guide to proposals on site, as this would prohibit viability, deliverability and the ability to satisfy other planning policies.

- It was also brought to attention that the draft site allocation fails to make any reference to the DIFS undertaken as part of the Kensal Canalside SPD which is an integral part of the evidence base and should therefore be considered and reflected upon in policy text.
- Thames Water Utilities Ltd noted that the anticipated scale of development is likely to require upgrades to the water supply network infrastructure and drainage infrastructure to ensure sufficient capacity is brought forward ahead of the development.

Site allocation SA2: Earl's Court Exhibition Centre Opportunity Area

Q.6. Please provide your comments on the proposed site allocation.

- Comments on draft policy SA2 were received from 20 stakeholders. Respondents included a number of residents associations (RAs); Labour Group of Councillors; Earl's Court ward Councillors; Woodland Trust; TfL, the GLA and Mayor of London; The Earl's Court Society; London Borough of Hammersmith and Fulham; Earl's Court Development Company; Thames Water and Environment Agency.
- Concerns and questions were raised by Kensington Society in regard to proposed land use quantum of development, both residential and commercial. It was noted that there is a lack of clarity on the justification behind the proposed quantum. Cllr Adourian suggested to set a limit on housing provided on site and include "maximum" number of homes in order to prevent overdevelopment of site. The developer, ECDC, stated that they would like flexibility in the site allocation to ensure deliverability of the scheme, in relation to quantum and early delivery of office space, development scale being sufficient to delivery infrastructure and affordable housing.
- Two respondents raised concerns over the quantum of commercial floorspace proposed, noting that careful consideration should be given regarding newly created "neighbourhood centre" so it does not compete with existing Earl's Court town centre nor has a detrimental impact on its vitality. Further clarity is required to indicate specifically what non-residential uses would entertain in this area, and how these would integrate into the residential-led scheme.
- Two respondents suggested that policy should also outline the targets for housing mix and highlighted the need for more family-sized homes required to redress the existing prevalence of 1-bedroom and studio flats in the area. One respondent raised the need for purpose-built older resident/mobility accommodation to ensure the development is multi-generational. The developer, ECDC, would like the flexibility to provide a wide range of housing

products to allow the quantity of affordable homes to be maximised for viability reasons.

- Three respondents objected to 20-storey buildings on site, citing that it would be out of character and context and have negative impacts on surrounding areas, such as overshadowing and wind tunnels. Some respondents questioned the justification for tall buildings to be suitable on site, with two suggesting high-density mid-rise built form should be considered. One respondent suggested that taller buildings should be non-residential, or, if residential, that family units should not be included. Two respondents asked for a more granular level of detail for the building heights diagram.
- Concerns were raised by three respondents over the plans for a large cultural venue or requested that further clarity is needed on what's expected to be delivered, particularly in relation to the meaning of "world-class facility". Some were concerned with potential impact of such large venue on residential amenity, traffic and air pollution. One respondent suggested if such facility will be provided, it should be subject to an international design competition in search for new iconic, green and sustainable replacement of demolished exhibition centre.
- The importance of green space provision on site was highlighted by 3 respondents who noted that proposed single public space/park is not sufficient for the size of the OA. It was suggested to develop a network of multiple smaller open spaces throughout the site in addition to the main park, as well as considering a network of spaces as different levels. LBHF suggested that the site allocation should give an indicative or minimum quantity for the amount of open space that will be included as part of the development in order to meet the needs of residents across the opportunity area. Woodland Trust suggested to include an explicit requirement to maximise trees, urban hedgerows and green infrastructure throughout the site.
- The aspiration for the development to be an exemplar of sustainability was queried by one respondent as to what this means in practice.
- Sport England noted that the rationale for allocating some land for public leisure facility is unclear as it is not based on robust and up-to-date evidence such as Built Facilities Strategy, and therefore Sport England is unable to form a substantive view on this matter.
- Thames Water Utilities Ltd noted that the anticipated scale of development is likely to require upgrades to the water supply network infrastructure. Water supply and pressure in the area was raised as a concern by the Kensington Society.
- TfL noted that they would support a reference to all development being car-free (with some provision for Blue Badge holders) and car parking for other

uses should be minimised in line with the approach to car parking set out in Policy T6 of the London Plan. In part Q, it was advised to coordinate with TfL via Spatial Planning to confirm if buses need to be extended into the site. Regarding part R, there are currently no plans to increase London Overground train service capacity on the West London line. Any plans to introduce additional services on the route between Shepherds Bush and Clapham Junction are not able to progress due to financial constraints. This should be accurately reflected with the draft Local Plan.

Large Sites

Q.7. Do you have any comments on the allocation for any of these sites?

- Three comments were received which did not relate to any of the identified potential sites allocations.
- CBRE on behalf of Catalyst Housing noted that information on construction timeframes of Wornington Green Development is out of date and the housing delivery figures are not quite accurate. The latest update on figures and timelines was provided, with Phase 3 building works expected to commence in January 2025, and complete in September 2029. As such, it is argued that it is premature to remove the allocation, and to not include any indication of the site-wide development parameters and principles.

SA3: 100/100A West Cromwell Road

- 10 comments were received, no objections raised to the principle of allocating this site as suitable for development.
- Of main concerns were improvements to public transport and lack of clarity / transparency regarding the quantum of commercial floorspace. TfL noted that the development should contribute to safety improvements and crossing facilities at Warwick/West Cromwell Road Junction, as well as be car free.
- West London Line Group and Eardley Crescent RA suggested to include a requirement under Infrastructure and Planning Contributions which would assist to build a new Piccadilly Line/West London Line interchange station (linked to or incorporating West Kensington station).

SA4: Former Territorial Army Site, 245 Warwick Road

- 6 comments were received, no objections raised to the principle of allocating this site as suitable for development.

- Two respondents raised questions whether the Planning permission (PP/06/0324) granted in 2008, has been implemented or expired. In case if it is expired, the respondents suggested to look afresh at the site and bring a new approach to the site.
- LBHF considered that the appropriate heights would be up to 10 storeys maximum considering existing surrounding context.
- West London Line Group and Eardley Crescent RA suggested to include a requirement under Infrastructure and Planning Contributions which would assist to build a new Piccadilly Line/West London Line interchange station (linked to or incorporating West Kensington station).

SA5: Lots Road South

- 19 comments were received, with main concerns being quantum of residential development proposed provided Employment Zone designation and building heights.
- Quantum of residential: 9 respondents, including Chelsea Society and local residents, opposed the idea that of a residential-led development on this site, stating that the balance of commercial to residential is inappropriate for a site in an Employment Zone. It was suggested that a greater amount of commercial space should be provided, as well as affordable/key worker housing which would meet local housing needs. Residential uses (market rate in particular) were suggested to be resisted and limited to a minimum required to enable “a significant uplift in both the quantity and the quality of the business use on the site”, as per Local Plan Policy CF5(k).
- The existing and forthcoming high density of residential in the immediate area is cited as a reason to resist more high-density residential development on this site due to the pressure on infrastructure such as open spaces and transport, as well as in general on the local community.
- GLA noted that care should be taken over the uses allowed on sites located in Employment Zone. Mixed-use or residential development proposals on Non-Designated Industrial Sites should follow the requirements set out in London Plan 2021 Policy E7 Part C and D.
- It was also noted that more thought should be given to the quality of commercial spaces provided, in order to provide multi-use space on ground and upper floors and thus attract wide range of businesses into the area. It was stated there should be more emphasis on non-residential uses such as convenience shops, units for local traders and workshops relating to the Employment Zone.

- Building heights: 7 respondents found the proposed heights of buildings in this location inappropriate and lacking in robust justification, citing potential negative impacts on surroundings and canyonisation effect on Lots Road. One respondent suggested that maximum heights should be kept to 4 storeys along Lots Road and greater heights incorporated on the western side of land parcel in LBHF if possible, alternatively, the quantum of residential should be drastically reduced if this cannot be achieved.
- It was suggested by one respondent group that there should be a requirement for “a new footbridge and access between the Zone and the northern end of the platforms of Imperial Wharf station”.
- The Environment Agency responded to highlight the requirement to raise tidal flood defences along the Chelsea Creek in line with the TE2100 plan.
- Thames Water notes that upgrades of the water supply network infrastructure are likely to be needed.

SA6: Edenham Way

- 19 comments were received. Main concerns expressed in the comments were regarding proposed building heights, the designation of site as appropriate for tall buildings, and loss of graffiti wall.
- Building heights: 14 respondents, including Kensington Society, RBKC Labour Group of Councillors and Trellick Tower RA strongly objected to the proposed heights of 14-storeys and found them not acceptable, as it would impinge on and harm the setting of Trellick Tower. Respondents suggested that new proposals should be in line with the 2015 SPD for this area which recommended heights of 4-6 storeys maximum.
- 13 respondents, including Trellick Tower RA and other local residents requested for the site to be removed from the list of sites “appropriate for tall buildings”. Same respondents also suggested that green space, play court and graffiti wall should be retained.
- 12 respondents suggested to designate Trellick Triangle as Conservation Area.
- Majority of respondents also noted that development must not only include the re-provision of residential care home demolished in 2008, but also provide other community facilities, such as a day centre for elderly residents, nursery and doctors surgery. 2 Respondents suggested that the development must guarantee that all units on this site will be a community housing rent.

SA7: Chelsea Farmer's Market

- One comment was received from Thames Water Utilities Ltd, outlining that no water/waste infrastructure concerns are envisaged on this site based on the information available.

SA8: Units 1-14 Latimer Road Industrial Estate

- 9 comments received.
- St Quintin and Woodlands Neighbourhood Forum, supported by Kensington Society, expressed their doubts regarding how realistic the housing figures for this site are, reflecting on the fact that within 6 years this site has been allocated in SQWN Plan, only 1 unit obtained planning permission and is being redeveloped. It was suggested to amend a target of 40 new homes in Years 5-10 of the new Plan, unless the Council agrees to de-designate the current EZ sections of the street in which case the current target of 75 homes would be realistic for the street as a whole.
- Two respondents, including St Quintin and Woodlands Neighbourhood Forum called for de-designation of The Latimer Road section of the Freston/Latimer Employment zone in order to improve viability of development for this site. On the other hand, two other respondents, including RBKC Labour Group of Councillors expressed their concerns regarding the housing numbers proposed, over-development and loss of light industrial uses, citing the importance of Employment Zone. These two comments strongly opposed to the change of use from light-industrial to commercial as well as increased housing numbers.
- In addition, lack of transport accessibility was cited as one of the main reasons for this site to be unviable for development and to change that, it was suggested for the Council to support the delivery of new pedestrian/cycle underpass between Wood Lane and Latimer Road which was agreed back in 2013, as well as investigate how transport accessibility might be improved via other means.

SA9: Newcombe House

- 5 comments were received, with main focus upon building heights of proposed site allocation policy.

- Kensington Society and Ladbroke Association strongly opposed to the idea that the site is suitable for more than one tall building and suggested that the development should be limited to a single isolated tall building instead. Furthermore, HVRA suggested that suitability for tall building should be restricted to the Secretary of State-approved height at the corner section of the site only, and not to extend throughout the whole site.
- Gerald Eve, on behalf of developer of the site, expressed their support for Part A of the policy which seeks to deliver a high quality commercially led development. However, it was noted that due to the change in emphasis in respect of the balance of land uses now sought, greater flexibility should be built into the policy regarding land-uses to make the development commercially viable.
- In addition, the developer now considers a more sustainable approach which would seek to retain the existing structure of the tower and reclad rather than redevelop. However, retaining the existing structure and foundations would make achieving step free access to the tube line unviable and therefore, this requirement in the policy was suggested to be reconsidered.

Small Sites

Q.8. Do you have any comments on the allocations for these sites?

- Six comments were received which did not relate to any of the identified potential sites allocations.
- Woodland Trust recommended for all sites allocations to include an explicit requirement to maximise trees, urban hedgerows and green infrastructure.
- Frank Knight on behalf of Frasco Investment Ltd expressed their disagreement with the Sites Allocation Paper conclusion that 136-142 Bramley Road Site has no capacity to accommodate more development and suggested that the site should be allocated. The developer argues that the site is suitable for redevelopment due to the lack of need for office floorspace in this location as presented in marketing evidence, and due to the fact that the existing building has not proved lettable to prospective occupiers due to location, the condition and the layout of the building.
- GLA noted that although the list of identified small sites that are able to provide a total of 124 homes is welcomed, the Local Plan should acknowledge the small sites target of 1,290 new homes set out in Table 4.2 of the LP2021.

SA10: Harrington Road Car Park

- Two comments were received. Cllr Wade raised concerns over the status of ownership of the site and questioned whether the council has any powers to do something to bring this site forward.

SA11: Emmanuel Kaye Building

- Two comments were received. Icen Projects, on behalf of Imperial College London, raised some concerns over this site, highlighting that they were unaware of any plans to designate the site in the first place. Although not opposing the designation of a site per se, Imperial College London suggested that further work is required to finalise site allocation policy, and expressed their interest in retaining and enhancing its research floorspace. As such, ICL would seek to secure an uplift in the quantum of floorspace dedicated to medical research, whilst strongly opposing any future reduction and highlighting the importance of safeguarding those uses for the long-term.

SA12: 142A Highlever Road

- Two comments were received.
- St Quintin and Woodlands Neighbourhood Forum noted that despite the site being allocated in Neighbourhood Plan since 2018, there was little progress for site coming forward due to the marginal viability. It is suggested for the new Local Plan to ensure that multiple designations, policies and guidance which impact on viability are imposed only when needed and their efficacy kept under review.

SA13: 3-5 Crowthorne Road

- Three comments were received.
- St Quintin and Woodlands Neighbourhood Forum noted that despite the site being allocated in Neighbourhood Plan since 2018, there was little progress for site coming forward due to the marginal viability. It is suggested for the new Local Plan to ensure that multiple designations, policies and guidance which impact on viability are imposed only when needed and their efficacy kept under review.
- Savills, on behalf of landowner of the site, objected to the site being allocated for housing development and requested the site to be removed from sites

allocations list. They noted that the proposals for fully commercial scheme were supported on pre-application stage and the landowner is expected to submit a planning application for a fully commercial scheme in the nearest future, so allocating this site for housing seems inappropriate.

SA14: Colebrook Court

- Two comments were received.
- Chelsea Society supported the idea of redeveloping the site, although noted that any proposals involving a building higher than the surrounding context will be met with opposition.

SA15: Holland Road Triangle

- Four comments were received.
- TfL, landowner of the site, suggested for site capacity to be changed from “a minimum of 30” new homes to “a minimum of 45” new homes, based on the discussions with Council officers that have confirmed the suitability of the site for the development of approximately 45-50 new homes.
- RBKC Labour Group of Councillors and West Holland Park Forum have both objected to the site being allocated for housing, citing loss of amenity space and poor air quality. West Holland Park Forum requested for the site being listed as Local Green Space so it would be protected from development.

Q.9. Do you have any other comments on Chapter 3?

- Fourteen comments were received.
- Historic England has expressed their concerns over the quantum of development some of the sites can accommodate sustainably within the context of building heights.
- TfL, together with Native Land, both landowners of the South Kensington Station site, argued that despite the recent refusal of the application, the site retains sufficient development potential to deliver much needed new housing and commercial floorspace that facilitate the delivery of step free access and other benefits. For these reasons, it is argued that the site should be allocated.

- TfL has also expressed their belief that the site known as Land Between Ladbroke Grove and Portobello Road should be allocated for housing as the site is expected to come forward for redevelopment early in the lifespan of the forthcoming Local Plan.
- Commercial Estates Group, landowner of Sloane Square House and Plaza 535 King's Road suggested that these two sites should be allocated. For 535 King's Road, it is argued that the new context was established for higher density development in this part of the borough following developments on Warwick Road, Earl's Court and Fulham Gasworks. The site is considered capable of a re-model, part-extension or comprehensive redevelopment and could take the form of commercial or residential, or mixed-use development. For Sloane Square House, it is argued that the site has a potential for a re-model, extension or redevelopment, to allow the building to be optimised and make its fullest contribution to this significant location.
- Westway Trust noted that they could suggest two small sites being suitable for allocation that could live up to the low-rise ambition expressed elsewhere in the plan. The sites themselves were not named.
- TfL recommended to introduce a requirement for infrastructure protection during construction and end state for sites that are on or adjacent to London Underground assets.
- Hammersmith and Fulham Council suggested that minimum and maximum acceptable building heights to be expressed in a consistent way, either in AOD or height from ground level.
- CBRE, on behalf of the client, promoted the site at 24 Elvaston Place as having potential to be allocated within the New Plan. The property, originally built for residential purposes, has been in D1 use since 1947. Since 2003 it was leased to an independent primary school, however, the site was recently considered surplus to Duke's Education group requirements and therefore the property was vacated in September 2021, although the lease does not expire until 2023. With the future of the site uncertain as a school in long-term, it is argued that it would be appropriate to seek an allocation to convert the site back to its original residential use.

4. Green-Blue Future

Policy G1: Circular Economy

Q.10. The policy considers how development should minimise waste during the building process. Please provide your comments on the Draft Policy G1 below:

- Comments on draft policy G1 were received from 22 stakeholders. Respondents included TfL and the Mayor of London; the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers and planning agents and property management groups; as well as the Labour Group of Councillors.
- The majority of responses received (18 of 22) expressed their support for draft Policy G1 or made no comment.
- Expressions of support were received from the Mayor of London, the Environment Agency and TfL; the majority of individual residents who responded; RAs; and Cadogan Estate.
- Two individual residents stated their concern that though the Council says it aims to be carbon neutral by 2040 in the NLPR they are not seeing those words put into action on the ground. Citing development and proposals at Acklam Road and Cheyne Nursery as examples of where development has been proposed or permitted that appeared to be contrary to the Council's environmental objectives.
- The Labour Group of Councillor's response included a question regarding how contaminated land at Kensal Canalside would be addressed.
- Finally, a single response, submitted on behalf of a property management group, objected to draft policy G1. The comment argued that draft policy G1 was not sound or justified and that reasonable alternatives had not been assessed.

Policy G2: Whole Life-Cycle Carbon

Q.11. This policy is intended to ensure that the carbon generated over the life-time of a building is reduced. Please provide your comments on the Draft Policy G2 below:

- Comments on draft policy G2 were received from 23 stakeholders. Again, respondents included TfL and the Mayor of London; the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual

residents; developers, planning agents and property management groups; as well as the Labour Group of Councillors.

- Overall, the vast majority of responses received again expressed support for draft policy G2, at least in principle.
- 13 of the 23 responses clearly expressed their support for or made no comment on Policy G2, including the Mayor of London and Environment Agency, as well as a number of RAs and individual residents.
- 3 of the 23 responses, submitted by RAs and an individual resident, suggested that the policies in chapter 4 of the NLPR could provide more detail on the sustainable retrofit and refurbishment of existing buildings. However, they did not object to the draft policy.
- 3 of the 23 responses expressed support for the principle of the draft policy but also their concern that it would not be put into practice. Citing the 344 Old Brompton Road development and Lots Road South in particular.
- The Labour Group of Councillors submitted comments arguing that all planning applications should be required to submit a WLC assessment. They did not object to principle of the draft policy.
- One objection to draft policy G2 was received, again in a representation made on behalf of a property management group. The comments argued that WLC assessments are too onerous for small scale major development and a higher threshold should be required by policy G2.

Policy G3: Energy and Net Zero Carbon

Q.12. This policy is intended to ensure that new development reduces energy demand and that major development is net zero carbon. Please provide your comments on the Draft Policy G3 below:

- Comments on draft policy G3 were received from 30 stakeholders. Respondents included TfL, the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers, planning agents and property management groups; as well as the Labour Group of Councillors.
- Overall, all 30 responses received supported the principle and intention of draft policy G3 or made no comment.
- 11 of the 30 responses made no comment or stated their clear support for the draft policy. These were submitted by a range of residents and RAs.

- However, a number of responses (8 of 30), though stating their support for policy G3 in principle, expressed concern that the 45% on-site carbon reduction requirement for major development and 31% requirement for minor development would likely be too onerous. Arguing that it could undermine development viability and the delivery of other planning benefits such as affordable housing. These representations were submitted by planning agents, developers and property management groups.
- Again, 4 of the 30 responses submitted by individual residents and RAs expressed their support for draft policy G3 but also their concern that it would not be put into practice. Again, citing the 344 Old Brompton Road development and Lots Road South in particular. These representations were all submitted by RAs and individual residents.
- A single response submitted by a RA supported the on-site carbon reduction targets proposed in draft policy G3 but expressed concern about the impact of renewable technologies on the borough's conservation areas.
- A number of responses (4 of 30) supported the principle and aims of the draft policy but made comments suggesting changes to the wording of the policy to increase its requirements for carbon reduction further. These were submitted by RAs.
- Additionally, a number of responses, including the Labour Group of Councillors questioned how the Council would assess, enforce and monitor carbon reduction requirements.

Policy G4: Sustainable Retrofitting

Q.13. This policy is concerned with how best to ensure that historic buildings can improve their energy efficiency, without harming their special historic interest. Please provide your comments on the proposed Draft Policy G4 below:

- Comments on draft policy G4 were received from 32 stakeholders. Respondents included Historic England, TfL, the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers, planning agents and property management groups; as well as the Labour Group of Councillors.
- Again, the majority of responses (27 of 32) made no comment or were supportive of draft policy G4, at least in principle. However, most but particularly those submitted by residents and RAs, called for more guidance and clarity from the Council on retrofitting interventions, measures and projects.

- Historic England expressed their clear support for the draft policy. However, they called for more detail to be provided about the evidence the Council will require applicants to submit in order to reach sound decisions and suggested the supporting text be expanding to emphasise the risks of maladaptation.
- Finally, 5 of the 32 responses submitted by residents and RAs expressed concern that draft policy G4 will result in harm to the borough's conservation areas.

Policy G5: Overheating

Q.14. This policy is concerned with how to reduce the reliance of major development on air conditioning. Please provide your comments on the proposed Draft Policy G5 below:

- Comments on draft policy G5 were received from 23 stakeholders. Respondents included Historic England, TfL; the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers, planning agents and property management groups; as well as the Labour Group of Councillors.
- All 23 respondents expressed their support for the aims and objective of draft policy G5 or made no comment.
- 7 of the 23 responses, submitted comments suggesting additions to the draft policy, to be more restrictive of air conditioning and single aspect dwellings. These were submitted by RAs and individual residents, as well as the Labour Group of Councillors.
- Finally, representations submitted by the Woodland Trust and Environment Agency, suggested that links to natural solutions, urban greening and tree planting – i.e. draft policies G14 – 17 be added to the supporting text.

Policy G6: Air Quality

Q.15. This policy is concerned with how to ensure that development is undertaken in a way which minimises its impact on air quality. Please provide your comments on the proposed Draft Policy G6 below:

- Comments on draft policy G6 were received from 31 stakeholders. Respondents included TfL and the Mayor of London; the Environment Agency and the Woodland Trust; a number of resident's associations (RAs); individual

residents; developers, planning agents and property management groups; as well as the Labour Group of Councillors.

- 7 of the 31 responses received clearly expressed their support for draft policy G6 or made no comment. These representations were submitted by individual residents, RAs and planning agents.
- A number of RAs and the Labour Group of Councillors (7 of the 31 respondents) submitted comments arguing that draft policy G6 does not refer to or address the principal driver of air pollution in the borough – car traffic/traffic congestion and construction sites. Arguing that the policy and supporting text should be redrafted to include explicit references and requirements/actions for traffic associated pollution. They did not object to the principle and objective of the draft policy.
- TfL submitted representations expressing their support for measures to improve air quality and suggested the Council make reference to the ‘healthy streets’ approach, promotion of active/sustainable travel and the reduction of car use.
- The Environment Agency commented expressing their support for draft policy G6. However, they highlighted that the draft policy fails to refer to the Agent of Change principles regarding air quality.
- The Mayor of London submitted representations commenting that draft policy G6 is not in conformity with London Plan 2021 policy SI 1, which requires all development to be air quality neutral.
- The Woodland Trust commented suggesting draft policy G6 be strengthened by adding reference to natural solutions.
- 3 of the 31 representations submitted by individual residents highlighted North Kensington is an area with particularly poor air quality, particularly in close proximity to the Westway. They expressed concern that draft policy G6 does not consider the North Kensington community and seek to address the issue of poor air quality in this area of the borough.
- Finally, 2 of the 31 representations submitted by planning agents felt that the draft policy was too onerous with regards to requirements for dust risk assessments.

Policy G7: Construction Management

Q.16. This policy is concerned with how to ensure that developments minimise construction impacts. Please provide your comments on the proposed Draft Policy G7 below:

- Comments on draft policy G7 were received from 22 stakeholders. Respondents included TfL and the Woodland Trust; a number of resident's associations (RAs); individual residents; planning agents; and the Labour Group of Councillors.
- Just over half (12) of the 22 responses expressed their support for draft policy G7 and the Council's code of construction practice or made no comment. These were submitted by residents and RAs, as well as TfL.
- However, 6 of the responses expressed serious concerns regarding the impact of construction traffic and argued that current construction traffic management plan requirements and scrutiny are not sufficient.
- Finally, a single response submitted by a property management group called for more detail on the requirements set out in the RBKC code of construction practice to be provided in the supporting text of draft policy G7.

Policy G8: Noise and Vibration

Q.17. This policy is concerned with how to ensure that the impact of noise and vibration generating sources are minimised during both the construction and operational phases of development. Please provide your comments on the proposed Draft Policy G8 below:

- Comments on draft policy G8 were received from 22 stakeholders. Respondents included TfL, the PLA, Thames Water, the Theatre Trust and the Woodland Trust; a number of resident's associations (RAs); individual residents and planning agents.
- The majority (15) of the 22 responses received were supportive of draft policy G8 or made no comments.
- Although supportive of the draft policy and its aims, TfL, Catalyst Housing, Thames Water all suggested the Council add further reference to the health streets approach and aim to reduce car use, as well as reference to London Plan 2021 policy D13 and D14 in the supporting text.

- In their representation, the Theatre Trust, again were supportive of the draft policy but called for greater emphasis to be placed on the protection of existing noise generating uses.
- The PLA expressed their support for the reference to the agent of change principle in draft policy G8 but suggested reference be made to Cremorne Wharf in the policy.
- 3 RAs submitted comments calling for the Council to take a more restrictive approach to planning applications for balconies, hot food takeaway, al fresco hospitality and other noise generating town centre type uses.
- A number of comments received also called for the Council to be more restrictive in its approach to construction site noise management. These representations were submitted by individual residents and RAs.
- Finally, 3 respondents (individual residents and RAs) expressed concern that monitoring and enforcement of noise nuisance by the Council is not good enough.

Policy G9: Odour

Q.18. This policy is concerned with how to ensure that odour is properly taken into account in the planning process. Please provide your comments on the proposed Draft Policy G9 below:

- Comments on draft policy G9 were received from 18 stakeholders. Respondents included TfL, Thames Water and the Woodland Trust; a number of resident's associations (RAs); individual residents and planning agents.
- All responses received were supportive of the draft policy at least in principle or made no comment. These representations included individual residents and RAs, TfL and Thames Water.
- 2 of the 18 responses received were expressly supportive of draft policy G9 or made no comment.
- Although supportive of the aims of the draft policy Thames Water (in two responses) again called for reference to be made to the agent of change principle in the policy.
- Again, although supportive of the draft policy a representation submitted by Catalyst Housing called for more clarity on the requirement for an odour assessment.

- Finally, two responses from individual residents expressed concern about how the Council can apply the draft policy in light of permitted development rules for town centre uses introduced with Use Class E. They were supportive of the principle of the policy however.

Policy G10: Light Pollution

Q.19. This policy is concerned with how to ensure that light pollution is properly taken into account in the planning process. Please provide your comments on the proposed Draft Policy G10 below:

- Comments on draft policy G10 were received from 19 stakeholders. Respondents included TfL, the PLA Thames Water and the Woodland Trust; a number of resident's associations (RAs); individual residents and planning agents.
- All of the responses received were supportive of the draft policy at least in principle or made no comment. These representations included individual residents and RAs, TfL, the PLA, Thames Water and Swifts Local Network.
- 3 of the 19 responses highlighted the negative impact of illuminated facias and signage on residential amenity. This were submitted by individual residents and RAs.
- Again, although supportive of the aims of the draft policy Thames Water (in two responses) again called for reference to be made to the agent of change principle in the policy.

Policy G11: Flood Risk

Q.20. This policy requires flooding, flood risk and safety to be considered for any relevant planning application. Please provide your comments on the proposed Draft Policy G11 below:

- Comments on draft policy G11 were received from 27 stakeholders. Respondents included the Environment Agency, Port of London Authority, TfL, Thames Water and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents, developers and property management groups.
- Most responses received were supportive of the draft policy at least in principle or made no comment. These representations included individual residents and RAs, TfL, the PLA, Thames Water and Environment Agency.

- In their representation, the Environment Agency were supportive of the draft policy and the accompanying Strategic Flood Risk Assessment and Sequential Test Assessment but called for greater emphasis on development to secure the objectives of the Thames Estuary 2100 (TE2100) Plan.
- Although supportive of the aims of the draft policy, Thames Water (in two responses) called for a strengthening of Policy G11 to include the requirement for sewer flooding protection measures for all subterranean development and not just those below the sewer level. This comment was also presented by representatives of the Ladbroke Association on behalf of the Kensington Society.

Policy G12: Surface Water Run-off

Q.21. This policy is concerned with surface water flooding and Sustainable Drainage Systems. Please provide your comments on the proposed Draft Policy G12 below:

- Comments on draft policy G12 were received from 23 stakeholders. Respondents included the Environment Agency, TfL, Thames Water and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents, developers and property management groups.
- Most responses received were supportive of the draft policy at least in principle or made no comment. These representations included individual residents and RAs, TfL, Thames Water and Environment Agency.
- In their representation, the Environment Agency were supportive of the draft policy but recommended that the wider benefits to flood risk management and biodiversity are highlighted.
- Thames Water (in two responses) supported the content of the draft policy but called for the text to be strengthened to promote green infrastructure over below-ground attenuation tanks.
- There were some concerns, primarily from developers and architects, over the inclusion of runoff rates that go further than the London Plan 2021, including for major and minor development.
- Thames Water, along with other representations from developers, recommended that the Policy be updated to include a mechanism through which an off-set payment could be calculated should the proposed drainage strategy not accord with planning policy.

- Some responses from resident's associations and individual residents noted the need for the Council to control through planning policy the increase in impermeable surfaces through the provision of an Article 4 direction.

Policy G13: Water Infrastructure

Q.22. This policy is concerned with the provision of water and sewage infrastructure, waterways and residential moorings. Please provide your comments on the proposed Draft Policy G13 below:

- Comments on draft policy G12 were received from 25 stakeholders. Respondents included the Environment Agency, Marine Management Organisations, Port of London Authority, TfL, Thames Water and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents, developers and property management groups.
- Most responses received were supportive of the draft policy at least in principle or made no comment. These representations included individual residents and RAs, TfL, Thames Water and Environment Agency.
- In their representation, the Environment Agency requested a greater emphasis on the requirement for developers to consult Thames Water on the available sewer and water supply capacity to support the development. This was echoed by Thames Water, which called for a strengthening of the policy and for any local capacity improvements to be delivered ahead of any occupation of the development.
- The Environment Agency called for the Council to undertake a high-level Integrated Water Management Strategy to identify the constraints to water and wastewater infrastructure across the Borough outside the Opportunity Areas.
- Some responses, including the Environment Agency, Thames Water and the Kensington Society, noted the need for the policy to provide a stronger emphasis on water consumption associated with new development.
- Regarding Waterways, the representations were generally supportive of the draft policy, with the Port of London Authority and Environment Agency calling for more emphasis on the multi-functional opportunities of the River Thames and Grand Union Canal. The Environment Agency also called for the Council to undertake a Riverside Strategy.

Policy G14: Green Infrastructure

Q.23. This policy is concerned with the provision of green infrastructure, or parks, grassed areas, street trees and physical greening. It is also concerned with the quality of the green infrastructure being provided. Please provide your comments on the proposed Draft Policy G14 below:

- Comments on draft policy G14 were received from 27 stakeholders. Respondents included the Environment Agency, Imperial College London, TfL, Thames Water and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents, developers and property management groups.
- All responses received expressed support for draft policy G14, at least in principle or made no comment.
- However, 3 of the 27 responses, submitted by a planning agent, property management group and TfL. Although supportive of the principle and aim of the draft policy, called for it to be relaxed by replace 'required' with 'should' to allow for more flexibility. Citing concern that many sites may not be able to achieve the target UGF scores.
- A number of responses received from RAs and individual residents suggested that the policy or supporting text be amended to add a cross reference to SuDs requirements set out in draft policy G12.
- RAs and individual residents (4 of the 27 responses) also suggested that the addition of explicit policy text regarding the protection of existing green infrastructure and connectivity of green infrastructure be added to the draft policy.
- Two responses from individual residents highlighted the importance of delivering urban greening in North Kensington where residents have less access to green open space and there is far less green infrastructure.
- The EA commented indicating their support for the draft policy but suggesting the supporting text be amended to align better with the NPPF by adding blue infrastructure to the definition and impacts of green infrastructure.
- Finally, a representation submitted on behalf of a property management group objected to draft policy G14. Citing a lack of an evidence base supporting the application of the London Plan UGF target scores in the RBKC context.

Policy G15: Parks, Gardens and Open Spaces

Q.24. This policy is concerned with the provision of new and protection of existing parks, gardens and open spaces. Please provide your comments on the proposed Draft Policy G15 below:

- Comments were received from 25 respondents including the Friends of Holland Park, Woodland Trust, TfL, Sport England, Thames Water, CPRE; a number of resident's associations (RAs) and individual residents; planning agents and developers.
- Six respondents explicitly expressed their support for the draft policy, others have suggested further improvements or made other comments related to green spaces in the Borough.
- Chelsea Society noted that Thames Conservation Area should be mentioned and given more emphasis in the chapter.
- One respondent noted that Part F of the policy sets out an unrealistic requirement on all major developments to deliver "on-site" external play space. The policy should include some flexibility to reflect other circumstances and clarify that it applies to residential development only.
- Friends of Holland Park noted that it is essential that the new open spaces provided as part of the development are meaningful and not a token space.
- West Holland Park Forum objected to the intent to allocate Holland Road Triangle as a site allocation for residential development and instead requested it to be listed as Local Green Space.
- Thames Water requested that the completion date for Thames Tideway Tunnel to be amended to 2025, remove reference to Counter Creek Project and to recognise the Chelsea Embankment site as having the potential to deliver public open space in accordance with the DCO.
- Three respondents suggested that green spaces on housing estates must be designated as protected spaces so any loss would be resisted with policy expanded to ensure "infill" or other development will provide enough green and communal open space. If green space is lost it will be replaced and preferably enlarged by turning nearby streets / grey space into parks.
- Two respondents suggested that private garden squares must be opened to general public as they are otherwise discriminatory. Options to build a small number of community housing in some of these gardens should be explored via a feasibility study.

- Sport England suggested developing a specific policy for playing fields and sport facilities to ensure that those facilities are protected.
- CPRE suggested that the Council should actively seek to designate as many open green spaces within the Borough as possible as Local Green Space, so they are protected. Green space deficiency can be tackled by transforming a minimum of 30 streets into 'streetparks' like the recently completed Alfred Place in Camden.

Policy G16: Biodiversity

Q.25. This policy is concerned with the protection of existing, and provision/enhancement of new features to support biodiversity. Please provide your comments on the proposed Draft Policy G16 below:

- Comments on draft policy G16 were received from 26 stakeholders. Respondents included the Environment Agency, TfL and Mayor of London; Swifts Local Network, and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents, developers, property management groups and LBHF.
- All 26 respondents agreed with the aim of draft policy G16, with 7 expressing clear support for the draft policy or making no comment. These were submitted by a number of individual residents, RAs and TfL.
- 5 of the 26 responses received expressed support for the draft policy but also suggested the policy be amended to say that the 10% net gain requirement is a minimum. These included the Environment Agency, Woodland Trust, a RA and LBHF. The EA comments indicated that this amendment would bring the policy in conformity with national legislation and policy.
- 2 of 26 submitted by a developer and property management group. Comments expressing their concern that the 10% net gain requirement could be too onerous for all sites in the borough and suggested relaxing the wording of the policy so that 10% isn't a strict requirement.
- The Mayor of London comments suggesting a link/cross reference to the UGF and London Plan policy G5 be added to the draft policy and supporting text.
- The Swift Local Network and Brent and Westminster Swifts Group comments suggested added specific guidance in the policy and/or supporting text to support the delivery and protection of artificial nest and roost sites in development. Stating that this amendment would ensure the draft is in conformity with national and London Plan policy.

- Finally, 2 comments made by an individual resident and the Earl's Court Society highlighted the importance of protecting West Brompton Wetlands.

Policy G17: Trees and Landscape

Q.26. This policy is concerned with the protection and provision of trees and landscape design. Please provide your comments on the proposed Draft Policy G17 below:

- Comments on draft policy G17 were received from 23 stakeholders. Respondents included the Environment Agency, TfL and the Woodland Trust; a number of resident's associations (RAs) and individual residents; planning agents and property management groups.
- Again, all responses received expressed their support, at least generally for the draft policy or its aims. 5 of the 23 responses clearly stated their support for the draft policy or made no comment. These were submitted by a number of individual residents, and a planning agent.
- A number of responses (5 of 23) submitted by residents and RAs highlighted the important of tree planting in new development, the protection of existing trees, and the importance of ensuring that when trees are planted, they are of value and given the best chance to grow to maturity.
- The Woodland Trust and a RA indicated their support for the draft policy but also suggested that the wording could be strengthened in part A to avoid using amenity, historic and ecological value and suggested changing this to simply say of value. The Woodland Trust also suggested a number of amendments to strengthen the draft policy.
- The Environment Agency expressed their support for the draft policy but also suggested that part I. could be strengthened to proactively encourage tree planting.
- Conversely TfL, though supportive of the overall aim of the draft policy, commented that it is too restrictive and expressed concern that this could lead to a failure to secure other important planning benefits. They suggest some amendments to part B of the policy to relax the policy to allow for the loss of trees if other planning benefits would be realised.
- 2 responses submitted by individual residents highlighted the importance of ensuring trees are planted and protected in North Kensington, citing the Wornington Green development as an example where development has result in the loss of importance mature trees in the area.

- In addition, 2 comments submitted by RAs highlighted a typo in the supporting text.
- Finally, the West Holland Park Forum responded with an objection to the Holland Park Triangle site allocation.

Policy G18: Waste Management

Q.27. This policy is concerned with the Borough's strategic waste targets and local site specific waste management principles. Please provide your comments on the proposed Draft Policy G18 below:

- 25 responses received from stakeholders. Responses were received from Port of London Authority, Environment Agency, GLA/ Mayor of London, Marine Management Organisation and Thames Water; LBHF and OPDC; residents associations and residents. 1 respondent clearly supported the policy, 8 did not comment and 1 stated they did not understand the question.
- LBHF acknowledge working with RBKC to explore the potential for sharing surplus capacity.
- OPDC suggest policy is reworded to clarify that OPDC/LBHF are not meeting RBKC's full needs (for all waste streams) and that the contents of any agreed Statement of Common Ground is reflected in the supporting text. They also seek all references to Cremorne Wharf to reflect its prioritisation for waste management and freight purposes.
- GLA seek further detail on a strategy to achieve zero waste for recyclables and biodegradables to landfill by 2026, how strategic sites can manage their own waste and the capacity assigned to Cremorne wharf given that the Thames Tideway Tunnel will not be complete until 2025.
- The EA, PLA and Thames Water are generally supportive of G18.
- 2 respondents raise concerns over odour, noise and traffic issues relating to any future potential waste management facility at Cremorne wharf. A further 2 respondents are critical of the safeguarding of Cremorne wharf for waste management purposes as their understanding is that a permanent riverside park would be created as indicated in the Draft Lots Road South Design Brief.
- Developers sought for Part E to be more flexible, this is to allow compliance where it can be demonstrated that co-location of waste management facilities as part of mixed use development is not feasible.

Policy G19: Contaminated Land

Q.28. This policy is concerned with how new development must address the issue of contaminated land and water pollution. Please provide your comments on the proposed Draft Policy G19 below:

- Comments on draft policy G19 were received from 14 stakeholders. Respondents included the Environment Agency, TfL and the Woodland Trust; a number of resident's associations (RAs), individual residents and a planning agent.
- Again, all respondents supported the principle of draft policy G19. With 9 of the 14 responses received expressing clear support for the draft policy or making no comment. These representations included TfL, the Woodland Trust and a number of residents and RAs.
- A resident submitted a comment expressing concern about large scale basement excavations at Lots Road South and concern about the impact of renewable technologies on residential amenity in historic residential areas.
- The Earl's Court Society commented highlighting the importance of applying this draft policy to any application at Earl's Court.
- The Environment Agency expressed their general support for the draft policy but also made a number of suggestions to further strengthen it.

Q.29. Do you have any other comments on Chapter 4?

- 18 stakeholders responded to question 29 which asked if they had any further comments to make on chapter 4 of the NLPR. Respondents included the Environment Agency, TfL, the Mayor of London and the Woodland Trust; a number of resident's associations (RAs), individual residents as well as the Westway Trust.
- A number of responses (8 of 18) made no further comments.
- The Environment Agency and the Westway Trust responded expressing their support for the aims of chapter 4 of the NLPR.
- TfL responded reiterating that greater emphasis should be given to the reduction of car use as outlined in their response to draft policy G6 – air quality.
- The response submitted on behalf of the Mayor of London reiterated that the Mayor's carbon neutral target has moved from 2050 to 2030 in light of the climate emergency as set out in their response to draft policy G1.

- Two responses submitted by individual residents highlighted the environmental inequality present in North Kensington and the importance of improving this through new development.
- A single response from a residents questioned how the Council plans to address the increase in recycling waste such as cardboard due to an increase in delivery brought about by the covid-19 pandemic.
- Finally, the Woodland Trust reiterated their response to draft policy G14 regarding encouraging tree planting in the borough.

5. Homes

Policy HO1: Delivery and Protection of Homes

Q.30. This policy is concerned with how the Council will support the delivery of new homes, protect the homes that we have, but also set out those circumstances where the loss of a home may be appropriate. Please provide your comments on the proposed Draft Policy HO1 below:

- Comments on draft policy HO1 were received from 48 stakeholders. Respondents included the DfT, TfL, the Mayor of London; Citizens Advice; a number of resident's associations (RAs) and individual residents; Councillors, developers, planning agents and property management groups.

Delivery of new homes (Policy HO1 Part A)

- Support for draft policy HO1 was mixed, 14 of the 48 responses expressed clear support for the Council's commitment to meet and exceed its housing target (i.e. part A). These representations included the Mayor of London, TfL, the DfT, and a range of RAs, developers, planning agents and property management groups.
- However, the largest number of number of responses (19 of 48), submitted by a range of residents, RAs and Councillors, as well as Citizen's Advice Bureau questioned why there is a difference between the local housing need figure of circa 1000 homes per annum identified in the LHNA and the 448 per annum target. These representations considered the target to be too low and questioned the evidence that the Council can deliver the required homes to meet its housing target and a 20% buffer, whilst also calling for the provision of social rented housing to be enforced in private development. The same group also questioned infill development and to reduce the development on some of the council owned sites such as land at Edenham Way.
- Conversely, 7 of the 48 responses submitted by residents, RAs and Councillors raised concerns about the borough's housing target and its ability to accommodate the densities of development that will be required to deliver it. Citing particular concern about the proposed heights and densities at the borough's opportunity area sites and large site allocations such as Lots Road South, with a RA and individual resident calling for a specific policy on housing density to be introduced in the NLPR.
- In addition, 2 responses made comments specific to Earl's Court, arguing that draft policy HO1 and the encouragement of site optimisation would lead to an overprovision of smaller homes such as 1 bed units, which does not meet the need for more family sized homes in the area. These representations were

submitted by a Councillor and RA. A similar comment was made by a developer regarding the Kensal Canalside opportunity area, calling for more flexibility to allow for the delivery of a range of housing at the site.

- Finally, a number of comments were also made, by a range of residents, calling for the Council to address the issue of under-occupancy in the borough to help alleviate the housing crisis.

Protection of existing homes (Policy HO1 Parts B and C)

- Most responses submitted stated their support for the approach to the protection of existing homes set out in parts B and C of draft policy HO1 or made no comment on this aspect of the draft policy. These included the DfT, TfL and the Mayor of London, as well as a range of residents and resident associations.
- 7 of 48 responses submitted by a number of residents, a Councillor, planning agent and the Welcome Trust objected to Parts B and C of draft policy HO1. They call for a more flexible approach to allow amalgamations and the loss of HMOs in some circumstances. Two of these representations specifically called for an exemption at Earl's Court.
- Catalyst Housing did question however why draft policy HO1 only states market housing will be protected, querying why the protection of affordable housing is not mentioned. (NB this is included within the affordable housing policy)

Policy HO2: Small sites

Q.31. This policy is concerned with how the Council will support the delivery of new homes on small sites. Please provide your comments on the proposed Draft Policy HO2 below:

- Comments on draft policy HO2 were received from 34 stakeholders. Respondents included TfL, and the Mayor of London; Citizens Advice Bureau; a number of resident's associations (RAs) and individual residents; developers, planning agents and property management groups.
- Support for draft policy HO2 was very mixed. 13 of the 34 responses received expressed clear support for draft policy HO2 or made no comment. These were submitted by a range of residents, planning agents, property management groups, developers, RAs, TfL and the Mayor of London.

- However, a large number of responses (16 of 34) asked for more clarity about the difference between infill and regeneration, expressing concern that the support for infill development set out in draft policy HO2 will result in infill development concentrated in the north of borough and lead to densities that will exacerbate overcrowding problems. These were submitted by a range of residents.
- In addition, 3 responses submitted by residents and RAs expressed concern about the impact of draft policy HO2, arguing that it will lead to overcrowding and/or harm to conservation areas, with two responses calling for a conservation area exemption to be added.
- Finally, Citizens Advice Bureau submitted comments highlighting resident's concerns that not enough sites for new housing development had been identified in the site allocations of the NLPR and calling for more public land to be brought forward for social housing. They also raised concern that the 650 sq. m threshold approach for affordable housing would result in the loss of opportunities for affordable housing provision compared to the national policy approach.

Policy HO3: Community Housing

Q.32. This policy is concerned with the nature and quantum of RBKC community housing which will be required on relevant sites. Please provide your comments on the proposed Draft Policy HO3 below:

- Comments on draft policy HO3 were received from 32 stakeholders. Respondents included the DfT, TfL and Mayor of London; Citizens Advice; a number of resident's associations (RAs) and individual residents; developers, planning agents and property management groups. Again, the response to draft policy HO3 was highly variable.

Threshold Approach and affordable housing provision

- Most respondents including the Mayor of London, TfL, DfT and a range of planning agents, developers, resident and resident associations in principle supported a threshold approach in line with the London Plan and the % requirements for affordable housing set out in draft policy HO3 or made no comment.
- However, 5 of the 32 respondents objected to the 650 sq. m threshold. Calling for an approach that aligns with the national policy and arguing that the 650 sq. m approach set out in draft policy HO3 would negatively impact

development viability. These representations included a range of residents and RAs, Citizens Advice, developers, planning agents and property management groups.

- 3 respondents including TfL commented indicating that the use of Community Housing rather than affordable housing was confusing and a more detailed definition on the term needed to be provided.
- In addition, TfL and Catalyst Housing highlighted that at present draft policy HO3 does not acknowledge the portfolio approach to providing 50% affordable housing on public land.
- Finally, TfL and two other respondents questioned the use of floorspace rather than habitable room in line with the London Plan.

Tenure Mix

- Again, most responses were supportive of the 70/30 tenure mix proposed in draft policy HO3 or made no comment. However, TfL, the Mayor of London, Labour Group of Councillors, Catalyst Housing, Citizens Advice and a number of individual residents commented expressing their concern about the support for First Homes in North Kensington specifically and questioned whether First Homes is genuinely affordable in the borough. Example is quoted of Camden Council issuing guidance opting out of this policy.
- The responses submitted by two individual residents and Citizens Advice also argued that 100% social rented housing was needed in the North of the Borough, citing data from the borough's housing register to support the argument.
- In addition, 4 responses submitted by developers, property management groups and planning agents called for more flexibility on the 70/30 tenure mix to acknowledge constraints that may impact on affordable housing provision on certain sites.
- Finally, 2 of the 32 responses submitted by a Councillor and a resident referred specifically to the application of the draft policy to the Earl's Court opportunity area. Asking for clarity on how the policy would be applied to the site.

Policy HO4: Housing Size and Standards

Q.33. This policy is concerned with the mix of types and sizes of homes which will be required on a site. Please provide your comments on the proposed Draft Policy HO4 below:

- Comments on draft policy HO4 were received from 32 stakeholders. Respondents included TfL, Citizens Advice, a number of resident's associations (RAs), individual residents and planning agents.
- 8 of 32 stakeholders clearly stated their support for draft policy HO4 or made no comment. These were submitted by TfL, a number of individual residents and RAs.
- 20 of the 32 responses received expressed concern that the bed size mix set out under draft policy HO4 and in the LHNA does not reflect the actual need in the borough, which is more concentrated toward larger, family sized homes. Respondents also commented questioning why the Council seeks to resist very large homes and were concerned that this means the Council will resist family sized homes. These representations were submitted by a range of residents, the Labour Group of Councillors and Citizen's Advice.
- In addition, representations submitted with regard to the Earl's Court and Kensal Canalside Opportunity Areas called for more flexibility in the draft policy so that housing can be delivered on the site that doesn't necessarily meet the bed size mix set out in the LHNA and draft policy.

Policy HO5: Specialist Housing

Q.34. This policy is concerned with how the Council will protect and support the delivery of homes for older people and other forms of supported housing. Please provide your comments on the proposed Draft Policy HO5 below:

- Comments on draft policy HO5 were received from 29 stakeholders. Respondents included TfL and the Mayor of London; a number of resident's associations (RAs) and individual residents.
- 8 of 29 stakeholders clearly stated their support for draft policy HO5 or made no comment. These were submitted by TfL, a number of individual residents and RAs.
- However, 13 of the 29 responses received expressed concern parts E and F of the draft policy only state that the Council will resist the loss of supported housing. Calling for the Council to actively promote an increase in supported housing. These comments were submitted by a range of residents and RAs.

- In addition, a number of responses submitted by RAs and residents highlighted the need to care home accommodation and homes of older people in the borough, particularly at Lots Road.
- Finally, the Mayor of London commented that the draft policy should take account of the indicative annual borough benchmark for specialist older persons housing set out in the London Plan.

Policy HO6: Other Housing Products

Q.35. This policy sets out how the Council will consider proposals which include “build to rent” and “co-living” forms of housing as well as how we will protect existing student accommodation/ will consider applications for the provision of new. Please provide your comments on the proposed Draft Policy HO6 below:

- Comments on draft policy HO6 were received from 21 stakeholders. Respondents included TfL and the Mayor of London; a number of resident’s associations (RAs) and individual residents, planning agents and developers.
- 10 of the 21 stakeholders expressed clear support for draft policy HO6 or made no comment. These were submitted by a number of residents and resident associations.
- However, 8 of the 21 responses received set out objections to the draft policy position on BtR, co-living and PBSA. These included TfL, the Mayor of London, a number of planning agents and developers, including representations submitted in respect of the Earl’s Court and Kensal Canalside OAs. The representations called for support for BtR, co-living and PBSA schemes, arguing that the evidence does not support the draft policy.

Policy HO7: Estate Renewal

Q.36. This policy sets out how the Council will consider proposals which involve the renewal of existing housing estates. This relates to estates owned by registered providers rather than the Council, as the Council has made a commitment not to carry out any wholesale estate regeneration on Council owned estates. Please provide your comments on the proposed Draft Policy HO7 below:

- Comments on draft policy HO7 were received from 18 stakeholders. Respondents included citizen’s advice, a number of resident’s associations (RAs) and individual residents and planning agents.

- 8 of the 18 stakeholders expressed support for draft policy HO7 or made no comment. Respondents included a number of residents and RAs, Catalyst Housing and planning agents.
- 3 responses submitted by RAs highlighted concern that draft policy HO7 does not acknowledge the need to renovate existing estates, citing particular estates in the north of the borough.
- The Woodland Trust and CPRE London submitted comments expressing concern that the draft policies do not protect green space on housing estates as they are not considered green space in planning terms, which creates inequity between streets and estates.

Policy HO8: Gypsies and Traveller Accommodation

Q.37. This policy sets out how the Council to seek to protect, improve and if possible, increase Gypsy and Traveller accommodation in the Borough. Please provide your comments on the proposed Draft Policy HO8 below:

- 13 responses were received to Draft Policy HO8. Respondents included TfL, the GLA and Mayor of London, Westway Trust, a number of resident's associations (RAs) and individual residents; Councillors, developers and planning agents and property management groups.
- 7 of the respondents made no comments, 1 supported the policy approach.
- One disagreed commenting that an alternative solution should be found and that integration should be fostered.
- The remaining responses provided general comments. Two respondents suggested amendments to the supporting text and draft policy, one (an RA) suggested referencing London Plan Policy at para 5.70 of the NLPR.
- The other respondent was LBHF who acknowledge the continued work with RBKC on updating the joint Gypsy and Traveller Needs Assessment. As joint work is ongoing, LBHF suggest a change to the Draft Policy HO8 to emphasise that capacity at stable way is increased "where necessary".
- One respondent commented that the search for an alternative site has been ongoing for four decades.
- The Westway Trust agree that the Stable Way area needs to be protected and refer specifically to the diversity of footfall and improving drainage.
- The GLA provided a general comment and highlighted that a London-wide Gypsy and Traveller accommodation needs assessment is being

commissioned. GLA also highlighted funding available to boroughs to make new provision and refurbish existing pitches.

Q.38. Do you have any other comments on Chapter 5?

- 14 stakeholders responded to question 38, 11 of which made no comment.
- A response submitted by the Cheyne Walk Trust echoed comments made under previous questions calling for the borough's housing target to be reviewed.
- Citizens Advice responded reiterating comments made under previous questions with regard to the difference between the local housing need identified in the LHNA and the borough's housing target.
- Finally, a response submitted by Kensington Against Dirty Money Campaign expressed concerns that the draft policies in chapter 5 do not address the issue of empty properties in the borough,

6. Conservation and Design

Policy CD1: Context and character

Q.39. This policy sets out how the Council requires new development to respect the existing context, character and appearance of an area.

- 28 responses were received for this policy. Respondents included TfL and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers and planning agents and property management groups; as well as the Labour Group of Councillors.
- Respondents were generally supportive of the overall objectives and wording of the policy, with particular interest on ensuring they seek to protect and enhance the borough's historic environment and assets. However, there are also respondents who are concerned about the implementation of these policies and have pointed toward examples of current and emerging proposals including Lots Road, Cheyne Nursery.
- Positive comments were made regarding the overall tone of the chapter, which has been simplified from the current Local Plan to be more concise. 3 respondents asked for the chapter opening to be amended to be more factual and more representative of all of the borough and its diverse character.
- A number of comments requested the specific inclusion of the typology 'villa' within the paragraphs/indents where typologies are discussed.
- Another common theme is the request for providing more emphasis and recognition of the role of green infrastructure, trees and planting to the character and that these should be protected on this basis and not just for their environmental value. One respondent raised a concern that the policy does not go far enough in addressing issues related to the climate emergency.

Policy CD2: Design quality, character, and growth

Q.40. This policy sets out how the Council is concerned with the quality of the design of new development

- 25 responses were received for this policy. Respondents included TfL, the GLA and the Mayor of London; Historic England and the Woodland Trust; a number of resident's associations (RAs); individual residents; developers and planning agents and property management groups; as well as the Labour Group of Councillors.

- Respondents were generally supportive of the overall objectives and wording of the policy.
- A number of respondents requested the use of the word 'legible' is clarified or removed as it is jargon that most people find meaningless.
- Further requests to specifically include the word 'villa' when listing typologies within the borough are made by respondents.
- Another common theme is the request for providing more emphasis and recognition of the role of green infrastructure, trees and planting to the character and that these should be protected on this basis and not just for their environmental value.
- The GLA and the Mayor of London point the council toward emerging London Plan Guidance in the context of further design guidance that will follow the Character Study.

Policy CD3: Heritage Assets – Conservation Areas

Q.41. This policy sets out how the Council will ensure that development will preserve or enhance the character or appearance of conservation areas.

- 23 responses were received for this policy. Respondents included Historic England and the GLA. There was general support for the policy overall. Negative comments were received but related to developments previously approved and implemented. A further respondent sought the complete rewriting of the policy on the grounds that it did not take adequate heed of sustainability concerns.
- Clarity was sought in regard to 'substantial' and 'less than substantial harm', which were felt to be technical terms not clear to the lay person and requiring further amplification in relation to the cumulative effects of less than substantial harm. The desire was expressed to see individual buildings and features within conservation areas given greater consideration. Other issues raised were the special nature of the Thames Conservation Area and the need to protect gaps within the townscape of CAs.
- Historic England focused on the Heritage Impact Assessments produced in relation to the Opportunity Areas and sought alterations to take into account the findings of the report commissioned by the Council from Urban Initiatives in relation to Kensal Green and Earls Court, a separate piece of supporting evidence.

- Two respondents sought minor amendments in relation uses in conservation areas, raising the issues of viability and the potential for introducing beneficial new uses.

Policy CD4: Designated Heritage Assets – Listed Buildings

Q.42. This policy sets out how the Council will ensure that development will protect the heritage significance of listed buildings and their setting.

- 31 responses were received for this policy. Respondents included Historic England and the Natural History Museum.
- The timbre of the responses overall was slightly ambivalent but generally supportive. A significant number, 15, had responded to make points about protecting the setting of listed buildings in the case of approved or prospective development schemes, which are issues of policy implementation rather than formulation.
- A minor number of changes were proposed on the basis that the policy was perceived as too weak. Some references were made to the issue of sustainability. One respondent suggested that the requirements of the policy in relation to demolition were unduly onerous.
- Historic England focused on the Heritage Impact Assessments produced in relation to the Opportunity Areas and sought alterations to take into account the findings of the report commissioned by the Council from Urban Initiatives in relation to Kensal Green and Earls Court, a separate piece of supporting evidence.

Policy CD5: Scheduled Ancient Monuments and Archaeology

Q.43. This policy sets out how the Council will ensure that development in the setting of a Scheduled Ancient Monument will protect its heritage significance.

- This is a fairly specialised area of interest, and the response was low, with 12 responses received. Comments were limited to small matters of detail, while 12 respondents supported the policy.

Policy CD6: Registered Parks and Gardens

Q.44. This policy sets out how the Council will consider planning applications within, or in the setting of a Registered Park and Garden.

- 19 responses were received for this policy. Although the policy is focused on registered parks and gardens as historic assets, a number of respondents commented on open space and ecology issues, and one sought greater recognition of sustainability issues. Better recognition of London Squares was sought by another respondent. Development on a number of gardens, some Registered, was proposed in two responses, but this is a matter of policy implementation rather than formulation.

Policy CD7: Tall Buildings

Q.47. This policy defines what the Council considers to be a tall building, appropriate locations for such buildings and the way any applications for tall buildings will be assessed.

- 43 respondents commented on this policy, with wide ranging focus to the responses. Generally, consultees are either concerned that the policy is either not restrictive enough and will result in an increase in the number of tall buildings (for their context) within the Borough, or, in contrast, consider the policy is overly restrictive and request further flexibility is included.
- 3 respondents have highlighted the use of the word 'appropriate' is not in line with the London Plan's 'suitable' when referring to locations for tall buildings.
- 3 respondents have specific concerns with the clarity of the maps which define the different thresholds for the two proposed tall building definitions. The GLA have requested that the strategic view from King Henry VIII's Mound in Richmond Park to St Paul's Cathedral is included in the map indicating tall building thresholds.
- The Mayor of London suggests more clarity is required in the policy for the location of tall buildings within opportunity areas, emphasising the need to ensure the capacity of the sites is optimised through the Design led Approach, as well as the need to avoid the use of the word 'indicative', which also applies to the Lots Road and Edenham Way sites. They are also concerned about the proposed exemption of single storey roof extensions within the policy, and have therefore suggested a higher threshold is proposed for areas where this issue may be applicable.
- Regarding the location of tall buildings within Opportunity Areas, respondents have suggested further clarity is needed with regards to the specific locations

of tall buildings, especially in the case of Kensal Canalside – these comments relate both to further restricting where tall buildings might be located and to allowing for further flexibility. Some specific comments which are relevant to the site allocations, and repeated there are also included.

- 5 respondents refer specifically to Lots Road as a location which should not be included as a location for tall buildings.
- A number of respondents have raised the issue of fire in relation to tall buildings and that this should be a key consideration within the borough, including one respondent who suggests policy should include the requirement for tall buildings to have more than one staircase.
- Historic England commend the character based, context led approach to defining tall buildings, however, they are concerned some of the diagrams defining their location are ambiguous, specifically mentioning Kensal Canalside. Furthermore, concerns are raised about the OA Building Heights Guidance evidence base document structure, clarity and conclusions, the latter which are not definitive. HE also recommends their updated advice note on tall buildings might be a useful reference for this policy.
- One respondent requested that a further definition of a tall building which is below 21 meter and might apply to areas where the housing is low built terraces is included.

Policy CD11: Existing Buildings - Roof Alterations/ Additional Storeys

- 14 responses were received in relation to this policy. They were generally neutral. One respondent felt that the policy was unduly restrictive and would make it harder to achieve small scale extensions within existing roofs, using dormers. The need to protect symmetrical facades were raised, as was the issue of protecting surviving historic dormers. The issue of plant and equipment was also raised.

Policy CD14: Views

- 32 Responses were received in relation to this policy. Those who expressed a preference were supportive. A significant number, 17, had responded to make points about approved or prospective developments where the views of various landmarks or areas would be affected, issues of policy implementation rather than formulation.

- Two respondents found the policy unduly restrictive and likely to inhibit development. One sought clarification of the interest of local views identified in the map, 6.5, accompanying the explanatory text.

Policy CD15: Fire Safety

Q.50. This policy is concerned with fire safety and when a Planning Fire Safety Strategy document must be submitted. Please provide your comments on the proposed Draft Policy DC15 below:

- 9 responses were received.
- Concerns were raised regarding the tall buildings with a single staircase, and that those should be refused.
- It was also highlighted that the 18 metres guideline is too vague, and more clarity should be brought into the policy explaining how those 18 meters are measured and what will be counted in and what will be omitted (rooftop machinery, plant rooms, lower ground storeys etc).
- On a more general note, it was noted that the policy overall is worded too vaguely at the moment and needs more work.
- People’s mobility and disability should also be accounted when considering fire safety risks.
- Mayor of London welcomed the draft policy and the requirement for Planning Fire Safety Strategy documents to be submitted for “minor” and “other” applications. It was suggested for the avoidance of doubt to make it clear that this requirement also applies to “major” developments in accordance with LP2021 Policy D12 Part B. It was also recommended to include reference to the Mayor’s Fire Statements Guidance and the Mayor’s Fire Safety LPG.

Q.51. Do you have any other comments on chapter 6?

- 22 responses were received.
- St Quintin and Woodlands Neighbourhood Forum, Kensington Society and Ladbrooke Association have commented and suggested amendments to the following saved policies:
 - CD8: Living Conditions
 - CD9: Small Scale Alterations and Additions
 - CD10: Basements

- CD12: Existing Buildings - Extensions and Modifications
- CD13: Shopfronts

The reasoning behind the proposed amendments is that due to the new policies introduced under Green/Blue Chapter there are instances where the wording of these saved policies on design and heritage will pull in a different direction to proposed new policies on green-blue futures.

7. Town Centres

Policy TC1: Location of town centre uses

Q.52 This policy is concerned with where new town centre uses should generally be directed to and the tests which must be satisfied when new large scale commercial uses are proposed.

- Responses were received from 10 stakeholders.
- Of those who offered a view, there was general support for the principle of “town centre first” and the associated sequential test. This included the GLA. However, this was not universal with the SQWNP suggesting that this may be overly restrictive, questioning both the appropriateness of the hierarchy of town centres itself, and the accuracy of the Council’s evidence in a post Covid world.
- In addition additional flexibility was supported by some others where:
 - near public transport interchanges (1)
 - other sites where need a viable active use (1)
 - beneath railway arches (2)
 - in other areas where these support local economies (2)
- One stakeholder noted the need to recognise the dual role of our larger town centres as places which meet day-to-day needs as well as attracting people from further afield.
- Bodies associated with Earl’s Court raised concern about the decline of the Earl’s Court Town Centre since the closure of Exhibition Centre. There is a need for a recognition of the importance of the redevelopment of the OA and a cross-department strategic view and with engagement with freeholders if the area is to improve.
- Representatives for Earl’s Court OA confirmed their support for a new town centre at Earl’s Court.
- Representatives for Kensal Canalside OA site confirmed their support for a new neighbourhood centre at Kensal, although greater flexibility is required in the associated site allocation to allow the neighbourhood centre to evolve and remain successful in the future.
- GLA supported our general approach but:
 - edge of centre town centre uses should only supported when have easy access to the town centre;

- need additional evidence if to support new retail floorspace (less than 400 sq m) outside/ not edge of centre;
 - need to recognise role of night-time economy (as per the London Plan) in South Kensington, King's Road and Kensington High Street; and
 - need to refer to embedding Healthy Streets Approach to create walkable neighbourhoods.
- One responder stated that centres must keep community feel and to this end the Council should not allow new large developments within our centres.

Policy TC2: Nature of Development within Town Centres

Q.53. This policy is concerned with the scale and nature of new development within town centres.

- Responses were received from 7 stakeholders.
- Most who responded were in general agreement with the approach suggested, that new development should reflect the scale and nature of the centre in which it is proposed.
- However, the follow points were also made:
 - Requiring the scale of development to reflect the function of the centre is overly prescriptive. (1)
 - More detail must be set out as to the role the council can take in implementing the strategy for its town centres (1)
 - An interdependent strategy (for both the Earl's Court Town Centre and OA) of the town centre is to thrive (3)
 - The council should not seek to restrict future amalgamation of small retail units. (2)

Policy TC3: Diversity of uses within Town Centres

Q.54. This policy is concerned with the range of uses within our town centres.

- Responses were received from 18 stakeholders.
- Most of those who responded were generally supportive of the approach that the Council is promoting, recognising the need to be flexible, be this as simply as a reflection of the freedoms offered under class E, or as a way to address

the rapidly changing nature of our town centres. There was also some specific support for a more proactive approach being taken to the evening economy (3), for the greater use of meanwhile uses. Medical/ Health care uses were noted as an appropriate town centre use. (1)

- However, a number of changes were proposed.
- In particular:
 - Widen support for meanwhile uses include all non-residential uses across the borough and not merely within town centres. This should include used by Imperial College. (1)
 - Council to provide subsidies for meanwhile uses to promote rehearsal spaces etc. (1)
 - Need to protect public houses (1)
 - Need more public realm improvements/ improvements to shopfronts. (1)
 - Support for protection of offices on upper floors, although wording to be amended to ensure that this can be achieved. (1)
- In addition 4 responses were received from stakeholders suggesting that hot food takeaways should be use which should be restricted in the same way as other “un neighbourly uses”. This is necessary if their potential impact upon amenity is to be recognised. 2 consultees suggested that this may particular appropriate near the borough’s schools.
- 3 consultees suggested that the percentage of betting shops etc in a given parade should be reduced, from the 25%/ 50% suggested. This included representations received from those with an interest in Earl’s Court.
- In this vein 3 comments were received suggesting that should be a total ban within Earl’s Court on any new alcohol licences, and on uses requiring a special licence, uses including massage parlours, tanning shops, nail bars and sex shops. Where such uses vacant premises, their replaced with a similar use should be resisted.
- Responses were received from 3 land owners who objected to the use of conditions to restrict the use of conditions to restrict uses within the E class for new developments.

Policy TC4: The evening economy

Q.55. This policy is concerned with uses which contribute to the evening economy.

- Comments were received from 15 stakeholders.
- There was general support for a policy which allows new uses which encourage the evening economy. It was generally recognised that these uses will help support our town centres, provide a use valued by residential and will support the borough's cultural offer.
- The majority of those who commented were of the view that it was essential that the potential impact of such uses upon the amenity of those who lived nearby must be strongly controlled. This should be done through a robust and joined up licencing regime. This must address opening hours, deliveries, noise and odour.
- Other comments were received which noted:
 - The need to resist late night entertainment uses near residential areas, and to introduce last entry time to prevent club hopping (1)
 - Need to make reference to agent of change principle (1)
 - Need for "affordable community values" in North Kensington (1)
- A comment was received from TFL who considered that support for new evening uses in large town centres only as being overly restrictive, and that the policy should encourage new evening uses across the borough, including in neighbourhood centres and beneath railway arches.
- The developer of the Earl's Court Opportunity Area asked that the allocation be amended to note that the OA is an appropriate location for evening uses.

Policy TC5: Local Shopping and other facilities which support day-to-day needs

Q.56. This policy is concerned with the protection of the commercial uses which meet the day-to-day needs of our residents.

- Comments were received from 11 stakeholders.
- Of those who responded, there was general support for a policy which seeks to protect local shops and other uses which meet day to day needs. However, the efficacy of the policy was questioned buy some (2) given the freedoms available under class E.
- In addition the following comments were received:
 - Policy should be amended to allow loss of these uses where shown to no longer served a local need (1)

- Need for a bespoke policy for Earl's Court Town Centre to address the changes associated with the closure of the Exhibition Centre and Covid-19. (1)
- Need for more affordable community run facilities. (1)

Policy TC8: Hotels

Q.57. This policy is concerned with the hotels, where they should be protected and where new hotels/ expansion of existing will be supported.

- Comments were received from 12 stakeholders.

New hotels

- The provision of new hotels in the areas named was generally supported. However, 2 stakeholders did question whether the provision of a new hotel in the Earl's Court OA was appropriate, or merely add further competition to the other hotels in the area.
- One land owner sought clarification as to the meaning of "immediate adjoining," and suggested that new hotels should be supported where in "close proximity" to a centre. Hotels should also be supported when "close to major tourist attractions."
- One stakeholder also noted that new hotel (and extensions to existing) should only be supported where residential amenity is protected.

Protection of hotels

- General support, with no objections received to loss of hotels in SW5 postcode area.
- However, one stakeholder wanted this to go further, suggesting that hotels should not be protected – throughout the borough- where there is no long term future as a hotel and when they lie within a predominantly residential area.
- LBHF supported the Council's draft policy.

Upgrading and expansion

- Support for the proposed approach from those who commented.

Short Term Lets

- Support for this approach. This included the need to protect both existing homes and residential amenity. STL need careful control, enforcement and monitoring.

8. Business

Policy BC1: Business uses

Q.59. This policy is concerned with the offices, industrial and warehouse uses, where these will be protected and where new uses will be supported.

Comments were received from 12 stakeholders.

General comments

- Some consultees questioned the office future need figures, and whether it really reflected the post covid-19 world. (4)
- Two consultees noted the need to recognise the freedoms offered under Class E, and that planning permission is no longer required for offices to change to other E class uses.
- Welcome recognition of home working
- Opposition to A4D for Latimer Road area (north of Westway)

Protect existing offices

- The majority of those who responded supported the general protection of offices across the borough. This includes the GLA.
- However, this view was not universal with some consultees suggesting:
 - Loss to housing should be allowed when allowing conversion back to residential. (1)
 - Housing should be prioritised over offices in most circumstances, given the need for new homes in the borough (2)
 - The Council should allow the loss of outdated poorly located small offices, to housing (1)
 - Loss of small offices should be allowed when more than a certain distance from an underground station (1)
 - Some net loss should be allowed when better quality more lettable space is provided.
 - It would be helpful to provide criteria when loss of offices may be acceptable.
 - The council should include those circumstances when the loss of offices will be acceptable. Marketing details, time vacant etc.

New offices

- General support for allowing new smaller offices across the borough, but directing larger offices to town centres, accessible locations and to the Employment Zones.
- This included support from the GLA, who noted that new offices outside centres need to be supported by improvements to walking, cycling and public transport connectivity and capacity.
- This was at odds with the comments received from TFL who supported new E class uses across the borough.
- One stakeholder pointed to the changes in the nature of the office market and that small offices in less than prime locations were no longer needed, with new offices being subdivided into shared workspaces. The distinction between large and smaller office buildings is no longer relevant.

Earl's Court

- The 20,000 sq m E class allocation for ECOA was too high (2)

Kensal

- New large scale offices in OA should only be supported if highly assessable (1)
- Kensal is not an appropriate location for new large scale offices (1)
- The Department of Transport (a landowner in Kensal) supported the 10,000 sq m allocation for E class uses on the Kensal site but stated that this should not be subject to a viability assessment.

Industrial and warehousing

- Few comments were received on this section of the policy, although comments were received from the GLA. They supported the Council's position and the need to protect light industrial and storage uses.
- The GLA also suggested that the policy be amended so that corresponds with London Plan Policy E7 (c), considering mixed use or residential development on non-designated industrial sites. Industrial floorspace can only be lost when shown to be no need. In a follow up letter the GLA asked the Council to

demonstrate how the need for 8,000 sqm of industrial floorspace will be addressed.

- The GLA initially suggested that the Employment Zones are categorised as Locally Significant Industrial Sites. (LSIS). However, they have amended this classification following further discussions with the Council when they were satisfied that the primary use within the Employment Zones are offices rather than industrial uses.
- The plan should recognise the borough being in the central service area, and therefore support the provision of a range of “essential services” associated with serving the CAZ.
- TfL noted that the Council should support E class uses beneath railway arches and not merely in town centres and Employment Zones.
- Other response from outside the GLA family included:
 - Light industrial uses should be allowed as part of the mix of E class uses in Opportunity Areas (1)
 - Some loss of light industrial uses should be allowed if an applicant can demonstrate that there is no demand and that the use has no long term future (1)
 - Need to retain B8 storage space (1)

Employment Zones

Latimer Road

- The SQWNF have requested that the Council de-designate the Latimer Road Employment Zone north of the Westway as Latimer Road is no longer a viable office location.
- Resisting the loss of E class uses will result in COU to other E class uses – such as dark kitchens, rather than a valued residential use. These uses may be unneighbourly.
- Support for allowing mixed uses in Latimer Employment Zone – but uplift in quality and quantity of existing business floorspace not possible.

In addition, the following comments were received.

- Need clarify what new town centre uses appropriate in Employment Zones. (1)

- Support agent of change principle in Employment Zones and need to recognise that business and residential uses are not always a happy mix. (2)
- Support retention of our Employment Zones and recognise the role that they have in providing for employment opportunities for residents (1)
- Residential uses should be allowed in Employment Zones when they support an enhancement of business uses. This should not necessarily equate to an uplift in quantity of floorspace.
- We should explicitly support new and intensified industrial uses in our Employment Zones.

Policy BC3: Affordable workspace

Q.60. This policy is concerned with how large commercial developments should provide affordable workspaces.

- Comments were received from 22 stakeholders.
- The majority of those who responded were generally supportive of the principle of the provision of affordable workspace (16). This included support from the GLA.
- It was noted that:
 - The provision of affordable workspaces could help meet the employment needs of residents
 - The Westway Trust could support the provision of the premises needed to add social value
 - The Guy's and St Thomas' NHS Trust should be eligible to occupy these spaces.
 - Particular benefit in providing a range of unit types and sizes
- A few respondents (6) were opposed to the principle of affordable workspace. They were concerned that the provision of affordable workspace was either not necessary and/or would jeopardise the viability of proposals and as such hinder delivery. This would result in a reduction in the commercial floorspace needed across the borough. There was also concern (1) that the AWS does not directly compete with stand alone providers.

- Many of those who did not object to the principle of AWSs did have reservations. It should be noted that these comments were largely made by landowners in the borough. These reservations/ caveats included:
 - Viability must be taken into account so that the requirement does not jeopardise delivery. Flexibility is important. (5)
 - Affordable workspace must not be a factor of reduced rent only, but must consider other needs, such as local employment, support for start-ups etc. (2)
 - There should be no requirement in town centre locations, as it may jeopardise investment in these areas
 - Must recognise that the Iceni evidence base was borough wide rather than site specific. The viability at scheme level must also be considered.
 - At lease rather than 20 years/ indefinite may be appropriate.
 - The quantum should be calculated through an evidenced need assessment

- On the practicalities of the policy:
 - It should be clear that the proposal relates to new floorspace only, and not to refurbishment of existing floorspace.
 - Details of how a payment in lieu contribution would be calculated.

- In addition, whilst the land owners for the larger strategic sites/ OA did not object to the principle of provision they welcomed delivery through a wider master plan.

9. Social Infrastructure

Policy SI1: Social Infrastructure

Q.62. This policy is concerned with the protection of existing, and support for the provision of new, social and community facilities. Please provide your comments on the proposed Draft Policy SI1 below.

- Comments on draft policy SI1 were received from 18 stakeholders. Respondents included the NHS North West London CCG, Guy's and St Thomas's NHS Foundation Trust, Imperial College London, TfL; a number of resident's associations (RAs) and individual residents; planning agents and developers.
- Six respondents explicitly expressed their support for the draft policy, others have suggested further improvements or made other comments related to social infrastructure in the Borough.
- One respondent noted that although the policy on protecting the existing social infrastructure is well written, it is less clear is how the Local Plan will actively encourage the filling of gaps in provision, especially at the local, 5-minute walkable community level. It was suggested that the Council would take a more proactive approach and make sure that the policy is in conformity with London Plan Policies S1-S6.
- Two comments brought to the attention the lack of social and community infrastructure in Earl's Court ward and suggested that more should be done to tackle this.
- One respondent suggested that the policy should explicitly state that planning contributions will be sought, where necessary, towards new and improved social infrastructure based on local needs assessment and requirements in IDP.
- NHS North West and Guy's and St Thomas's NHS Foundation Trust both called for amending the policy wording to allow further flexibility to allow the loss of a health facility, or part disposal of a site, where declared surplus to requirements in accordance with service transformation and estate strategies.
- Imperial College expressed their disappointment caused by the lack of attention given to education in draft policy SI1 and important role in plays in reducing inequalities. As such, it was suggested that draft policy SI1 and the supporting text be expanded upon significantly, to include a separate sub-section focusing exclusively on education.

Q.63. Do you have any other comments on chapter 9?

- Comments were received from two stakeholders: Imperial College London and Catalyst Housing Ltd.
- Imperial College London requested for the policy to overcome the inherent barriers and limitations arising from the separation of Commercial, Research & Development and Medical land uses (Use Class E) from Educational (Use Class F1a) within the Use Classes Order. Separate draft policy should seek to bridge this disconnect to allow for the provision of new and adaption of existing spaces for innovation centres or incubators where education, research, start-ups and SMEs can flexibly mix within the same building.
- It was also proposed to include a specific policy within the Local Plan, which would reflect Imperial College London as a key stakeholder within the borough and ties in their interests, which would seek to accomplish the following:
 - *Emphasising and acknowledging the status of Imperial College London as a key stakeholder within the borough and the role which this plays in South Kensington;*
 - *Address the barriers placed upon the University by the lack of flexibility in changing easily between Class E and F uses, allowing Imperial College London the freedom to bring forward change of use easily where required;*
 - *Acknowledging Imperial College London's student accommodation requirements and ensuring that this is included within the borough's projected housing requirements; and*
 - *Recognising and allowing for the change of use of the University's student accommodation developments where the change of use leads to educational or wider public benefit to the Borough.*

10. Streets and Transport

Policy T1: Street network

Qu 64. This policy is concerned with the provision of well-connected, inclusive and legible streets.

Comments were received from 18 stakeholders. This included comments from both TfL and the GLA.

TfL

- Suggest lack of evidence base
- Need to ensure that the Council secures land for transport. All land required for transport (including bus garages and rail infrastructure) is protected from development. This includes safeguarding for Crossrail 2
- Need to identify cycling networks and any gaps or potential improvements
- Need to incorporate Mayor's objectives for transport, including target for 80% of all trips to be by public transport, or 90% for inner London.
- Need to include comprehensive planning cycle routes
- Need reference to Healthy Streets and Vision Zero

GLA

- Plan lacks robust strategy to achieve vision to encourage active travel
- Needs to be stronger in discouraging car use and encouraging active travel
- Need to be explicit in need to secure land for transport.
- Need to identify cycling networks and any gaps or potential improvements
- Development to provide cycle parking at above minimum levels
- Further expansion for cycle hire facilities
- Support for seeking step free access welcomed

Other comments included:

- The policy is of no relevance for Chelsea as there will be little or no development in the area which will affect the street from.
- There should not be a "in principle" objection to the creation of gated developments, with each such proposal to be assessed on its merits. (2)
- Policy should set a zero pedestrian deaths target (3)
- New street should be assessed on merits rather than reflect the historic street pattern (2)
- Need to include latest PTAL map
- Need to improve waymarking/ improve pedestrian environment.

- Need to ensure high levels of accessibility on streets and pavements
- Support for designing out crime. Need a dedicated officer to assist in this regard
- Need to incorporate existing trees and maximise potential for new tree planting sites
- Need reference to Healthy Streets approach (3)
- Need to ensure that a balance reached and that motorists are not being penalised.
- Need to enhance provision for cycling (3)

Policy T3: Living Streets and outdoor life

Qu 65: This policy is concerned with the use of our streets, to create places which support outdoor life. This includes places for outdoor hospitality, for markets and for special events.

Comments were received from 12 stakeholders.

There was a high level of support for the policy and initiatives to encourage outdoor hospitality (9)

However, this was caveated:

- Need for high quality design and no unnecessary clutter.
- Need to safeguard resident's amenity
- Need for safe and clean streets

Other comments included the need for more open space and a need to recognise the potential environmental benefits of temporary spaces. One RA close to the Royal Hospital asked that outdoor events with amplified sound be limited to 9:00 pm.

Policy T4: Streetscape

Qu 66. This policy is concerned with streetscape, or the nature of signs, street furniture and other structures and features on our streets.

Comments were received from 17 stakeholders.

There was a high level of support for the Policy. A number of specific comments were received:

- Resist opaque/ high garden walls (2)
- Need to holistically address streetscape policy, include cycle parking. (TfL)

- Need to reference Healthy Streets and Vision Zero (TfL)
- Promote more street trees
- Remove clutter
- More bins and signage
- Be more robust on the ambition to resist advertisements. In particular resist new large illuminated hoardings and ensure that only support adverts in residential areas when essential and “in character”.
- Support large developments providing public art, but the policy must allow for viability testing.

Policy T5: Land Use and Transport

Q.67. This policy is concerned with the provision of well-connected, inclusive and legible streets.

Comments were received from 12 stakeholders.

- Why only refer to development management eg on encouraging active travel
- Scepticism re PT improvements at Kensal
- Travel plans not monitored
- List of transport requirements at Earl’s Ct
- Explicit reference to car free development in A.
- Interesting rejection by TfL of using “good” in relation to PTAL, and it even says that PTAL 2 can be good in some contexts. I think we should push back on this. PTALs have long had qualitative terms attached to them

Policy T6: Active Travel

Q.68. This policy is concerned with supporting active travel, or improving the walking and cycling environment.

Comments were received from 18 stakeholders.

- Again, rejects limiting transport improvements to development
- Thames Path not complete
- Request to add reference to avoid the removal of street trees

- TfL seek reference to Healthy Streets approach – are we comfortable with this?
- Request to add cycle parking standards to policy document
- KEY issue is requirement to set out map of gaps in our cycling infrastructure with a plan to address these.
- TfL also request that we acknowledge our “local networks are unsafe for cycling” and “not attractive for walking”.
- TfL seeks addition of reference to seeking expansion of cycle hire – we should support this
- TfL request that we have a traffic reduction policy
- As with TfL, GLA asks for plans of our cycling network including new proposed route. A map of back-street Quietways will not satisfy this requirement.
- GLA also asks to identify walking networks; officers prefer to focus on locations where there are barriers to pedestrian movements – usually busy roads with no ped crossings, sometimes rail lines

Policy T7: Public Transport

Q 69 This policy is concerned with supporting improvements to public transport/public transport infrastructure.

Comments were received from 18 stakeholders.

- Chelsea Soc asking us to state opposition to Crossrail 2 and require removal of safeguarding
- Kensington Society want us to remove reference to the potential Elizabeth Line station at Kensal given our acceptance that no further work on a station will happen during lifetime of this Local Plan.
- Request to recognise the river bus services at Cadogan Pier

Policy T8: Parking and Access

Q.70. This policy is concerned with supporting improvements to public transport/public transport infrastructure.

Comments were received from 14 stakeholders.

- Kensington Society say there is no need to resist reductions in on-street parking, noting the success of parklet terraces. There is no formal policy within T8 to resist loss of on-street parking but there is text in para 10.34
- TfL want direct reference to London Plan parking standards included in our policy.
- Chelsea Society and TfL both say all new development increases congestion, but our policy T8B refers only to “material” increases in congestion. To consider request for a mitigation approach to minimise traffic demand even in car-free developments, (eg to minimise servicing trips)
- Conversely, EC development Company refer to the NPPF’s position that development should be resisted on highways grounds if the transport impacts are “severe”.
- TfL want tougher wording on new public car parks “not allow” instead of “resist” and to avoid referring to new off-street parking (even in the context of minimising such parking).
- Kensal developers pushing back against 100% EV charging point provision – suggesting 20% active, 80% passive.

Policy T9: Servicing

Q.71. This policy is concerned with supporting improvements to public transport/public transport infrastructure.

Comments were received from 18 stakeholders.

- WLLG seek addition to text of support for servicing by rail and water.
- A comment on T9B being unrealistic in expecting all servicing for new development to be on-site.
- We should add some level of support for using cargo bikes to mitigate servicing impacts

11. Infrastructure and Planning Contributions

Policy IP1: Infrastructure and Planning Contributions

Q.73. This policy is concerned with how new developments address the needs they put upon infrastructure. Please provide your comments on the proposed Draft Policy IP1 below:

- 19 responses were received to Draft Policy IP1. Respondents included TfL, Environment Agency, Sport England, Met Police, NHS, LBHF; a neighbourhood forum, a number of resident's associations (RAs) and individual residents; developers and planning agents.
- 7 responses made no comments and 2 clearly support the draft policy.
- Both the Environment agency and Met Police are seeking reference to planning contributions for infrastructure that relates to them in the draft policy.
- TFL suggest that the detailed transport infrastructure set out in the London Plan be referenced and that the planning contributions SPD also be updated.
- Sport England highlighted that updated evidence relating to playing pitches and built sports facilities is required to support the NLPR.
- LBHF Support Draft Policy IP1 D. and suggest including a reference to its application to Opportunity Areas / Strategic Development Sites that impact on neighbouring boroughs or cross borough boundaries.
- Other comments received were:
- Improve readability of the IDP
- Areas that have been impacted by past development should receive some gain in amenity.

Potential Changes to Policy IP1 as result of consultation comments

- Consider including a non-exhaustive list of the likely planning obligations/contributions that may be required, similar to existing paragraph 17.2.6 of the adopted Local Plan.
- Review NLPR policies and consider if additional references to planning obligations/contributions are required.

12. Appendices and Glossary

- 14 stakeholders responded to question 75 which asked if they had any comments to make on the appendices and glossary sections of the NLPR. Respondents included the PLA, TfL and the Woodland Trust; a number of resident's associations (RAs), individual residents; and planning agents.
- 8 of the 12 responses made no comment.
- The 4 other responses commented making suggestions for additions to the glossary.

13. IIA

- 11 stakeholders responded to question 77 which asked if they had any comments to make on the IIA published alongside the NLPR.
- 9 of the 10 responses made no comment.
- 1 respondent expressed their support for the IIA.
- And 1 respondent commented arguing that development at the Kensal Canalside and Earl's Court opportunity areas should be put on hold due to insufficient capacity for sewage/waste removal.

14. HRA

- 10 stakeholders responded to question 78 which asked if they had any comments to make on the HRA published alongside the NLPR. All of which made no comment.