

Planning and Place

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THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

8 February 2023

My reference: New Local Plan Review (NLPR)

Dear Mr McClean,

Submission of the Royal Borough of Kensington and Chelsea New Local Plan Review for examination

Section 20 of the Planning and Compulsory Purchase Act 2004 and Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

I am pleased to submit the Council's New Local Plan Review (NLPR) to the Secretary of State for examination.

This cover letter explains a number of matters under the following sub-headings relating to the NLPR and its submission for examination:

- 1) Purpose, scope and topics
- 2) Proposed Modifications
- 3) Consultation
- 4) Statement of Common Ground and Duty to Cooperate
- 5) Policy Formulation Reports
- 6) Core Documents
- 7) Contacts and Programme Officer

1) Purpose, scope and topics

The Council adopted its current Local Plan in September 2019. While adopting the current Local Plan, the Council made a commitment to undertake an early review. This was to reflect the Council's new values following the Grenfell Tower tragedy. The Council commenced work on the NLPR in September 2020 and the following consultations have taken place. The consultation has taken place in accordance with our Statement of

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Community Involvement, February 2020 **(CD2/04)** and the programme has been aligned with the latest Local Development Scheme, January 2022 **(CD2/05)**.

- [Issues, September 2020](#) (early engagement)
- [Issues and Options, July 2021](#) (early engagement)
- [Draft Policies \(Regulation 18\), February 2022](#)
- [Publication Policies \(Regulation 19\), October 2022](#)

Some policies in the current Local Plan 2019 are considered to continue to be effective and not requiring a review. These policies have been saved and are listed in Appendix 2 of the Publication Policies (Regulation 19) document **(CD1/01)**. These are also listed within the chapters at the relevant location.

The topics included in the NLPR are:

- Chapter 1 – Introduction
- Chapter 2 – Green-Blue Future
- Chapter 3 – Homes
- Chapter 4 – Conservation and Design
- Chapter 5 – Town Centres
- Chapter 6 – Business
- Chapter 7 – Social Infrastructure
- Chapter 8 – Streets and Transport
- Chapter 9 – Places – Areas for growth and change
- Chapter 10 – Site Allocations
- Chapter 11 – Infrastructure and Planning Contributions
- Glossary
- Appendix 1: Sites within the Housing Trajectory
- Appendix 2: Schedule of Saved and Superseded policies
- Appendix 3: Strategic Policies

2) Proposed Modifications

Following consultation on Publication Policies (Regulation 19) the Council has proposed Main and Minor modifications. The Main Modifications are proposed where the Council considered the representations received made a valid point and making the proposed modifications would make the Plan more effective. The justification for proposing the modifications can be seen in the Council's responses to the comments received as set out in Appendix 1.2 of the Consultation Statement **(CD3/01/1.2)**. They are also set out within the Proposed Main Modifications document **(CD1/02)**.

Main Modifications to Policy GB4: Energy and Net Zero Carbon are also proposed because the Council received extracts of a new evidence base document – the Draft Towards Net Zero Carbon Study, January 2023 **(CD7/06)**. This study is being undertaken by a consortium of consultants jointly for 19 London Boroughs. This evidence is not yet finalised and is in a draft form, as a result further modifications in addition to those suggested may emerge during the examination.

Minor modifications are proposed simply to correct typos or to aid clarity.

3) Consultation

The Consultation Statement (**CD3/01**) sets out details of all the consultation (including early engagement) undertaken in formulating the NLPR.

The Mayor of London has provided a letter of General Conformity with the London Plan (**CD3/02**).

The Council received responses from 100 stakeholders to the Publication Policies (Regulation 19) consultation. An electronic database of responses received at Regulation 19 is available [on-line](#). Many respondents directly input their responses on-line and as such the Council does not have pdf/email responses to these. All responses received by email have also been manually added by the Council to this database. However, some respondents submitted detailed pdf attachments and due to the length of these documents the Council could not add them to our system. Document **CD3/03** [List of Respondents, Publication Policies \(Regulation 19\)](#) provides a comprehensive list of respondents and also indicates where additional information was provided in pdfs (these have all been submitted).

The Council has considered all responses received and has provided its own comments to assist the Inspector in Appendix 1.2 of the Consultation Statement (**CD3/01/1.2**).

A full list of stakeholders who responded to the Publication Policies (Regulation 19) consultation has been provided with contact details to the Programme Officer, in-line with GDPR requirements.

4) Statement of Common Ground and Duty to Co-operate

The Council is submitting a Statement of Common Ground (SoCG) (**CD4/02**) on strategic cross-boundary matters being addressed in the NLPR and progress in cooperating to address them. It also forms part of the evidence base demonstrating compliance with the 'duty to cooperate'. The SoCG is with adjoining boroughs, namely London Borough of Brent, Westminster City Council, London Borough of Wandsworth and the Old Oak and Park Royal Development Corporation (OPDC).

The London Borough of Hammersmith and Fulham (LBHF) has provided a separate position statement where they have agreed to the majority of the SoCG but do not agree to the inclusion, within the SoCG, to the 20 storey maximum buildings height to be applied to the RBKC's side of the Earl's Court site allocation (**CD4/04**).

A separate SoCG has been prepared on the topic of waste with LBHF and OPDC as they have agreed to take a proportion of the Borough's London Plan waste apportionment.

In addition, a detailed Duty to Co-operate (DtC) Statement (**CD4/01**) has been prepared outlining the engagement undertaken by the Council with neighbouring boroughs, the GLA, OPDC and other statutory stakeholders. Appendix 7 sets out the Council's concerted efforts to positively engage with LBHF, in particular on the Earl's Court Opportunity Area, including requests and follow up emails to undertake a joint Placemaking Framework.

5) Policy Formulation Reports (PFRs)

Policy Formulation Reports have been submitted to cover each policy being reviewed, as set out in the core documents list. These are structured to set out the relevant legislative background, national and London Plan policies, provide a summary of the evidence

behind the policy, setting out the options considered as well as the engagement undertaken under the Duty to Co-operate.

6) Core Documents

The Council has attached a Core Documents Index, February 2023 alongside this covering letter. This includes a unique reference number for each document being submitted which corresponds with the documents published on the examination webpage.

In addition to the pdf of the Publication Policies (Regulation 19) document, a Word file has also been provided to PINS (this will not be published on-line).

7) Contacts and Programme Officer

The Council has appointed a Programme Officer whose contact details are as follows:

Name	Title and Address	Email	Phone
Helen Wilson	Programme Officer	progofficer@aol.com	0151 352 3863 07879 443035

The contact details for the lead Council officers on the NLPR are:

Name	Title	Email	Phone
Preeti Gulati Tyagi	Planning Policy Team Leader	preeti.gulati@rbkc.gov.uk	07739 314997
Jonathan Wade	Head of Spatial Planning	jonathan.wade@rbkc.gov.uk	07739 313758

I would be grateful for confirmation of receipt of this submission.

Please do not hesitate to contact me should you require further information or clarification.

Yours sincerely,

Preeti Gulati Tyagi
Planning Policy Team Leader