7 October 2014

Dear Mr Turner

Royal Borough of Kensington and Chelsea: Enterprise Review Sustainability Appraisal Scoping Report

Thank you for consulting English Heritage on the Royal Borough of Kensington and Chelsea’s Enterprise Review Sustainability Appraisal Scoping Report. As the Government’s statutory adviser on the historic environment, English Heritage is keen to ensure that heritage conservation and enhancement is fully considered in all aspects of the local planning process.

Accordingly, we have reviewed your consultation in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Having done this, English Heritage welcomes the identification of the Royal Borough’s local distinctiveness as one of the key sustainability issues that warrants consideration in the Sustainability Appraisal of the Enterprise Review. We recommend, however, that the issue is more clearly defined than it is currently in the table. The table identifies the ‘problem’ as the Royal Borough’s distinctiveness. We consider that the sustainability issue is: how to ensure that in protecting employment uses and enabling residential development, the Royal Borough’s local distinctiveness is still conserved and enhanced, and that its heritage assets are not harmed.

English Heritage accepts the Sustainability Appraisal Objective for cultural heritage as sufficient for assessing the impact on the Royal Borough’s heritage assets.

English Heritage wishes to advise that it has raised significant concerns about the potential impact of the Mayor of London’s proposed amendments to the Town Centres policy of the London Plan in the recent examination of the Further Alterations to the London Plan (FALP). In the evidence that we provided to the FALP, English Heritage identified Kensington High Street as a ‘town centre’ that
should be exempt from the requirement to actively enable significant high density residential development because of the potential impact on its historic environment. We also identified South Kensington, Notting Hill Gate and Portobello Road as having such a density of heritage assets as to require an area action plan for the implementation of the London Plan town centre policy as amended by the FALP.

We consider the matter of adapting the Royal Borough’s historic town centres to be relevant to its Enterprise Review. Therefore, in accordance with the questions asked in the Duty to Co-operate section of the consultation, English Heritage would welcome working with the Royal Borough on its development of policy and/or plans for these places.

Finally, for the avoidance of doubt, I must note that this advice is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise relating to this or later versions of the Local Plan, and which may have adverse effects on the historic environment.

Yours sincerely

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