

Local Plan Partial Review

Issues and Options

Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Section 1: Introduction to the Partial Review

Question 1: Are there any topics or policies in the Local Plan, other than those identified in Figure 1.2 or Appendix A, which should be reviewed as part of the Local Plan Partial Review? If so, please explain and provide reasoning?

Name	Comment	Council's Response
Charles Bezoari Elder	<p>The list of Topics may be interpreted as also listing the Priorities in order of importance. Housing should be far higher up in the list in order to be consistent with the UK Govt's priority for new Housing. There is no reason why shops etc should rank higher, and it may well give the impression that this council is more interested in the items that come above Housing on this list. This problem is replicated later when the Call for Sites shows Housing as well below other items. The single most pressing issue facing us is the shortage of housing/ need for new housing in the borough. Thus Housing should be as far up the list in each and every category.</p>	<p>Housing is already a significant component of the Local Plan Partial Review – see Issues and Options section 10 'Housing' and Draft Policies Chapter 35 'Diversity of Housing'.</p> <p>No change.</p>
Onslow Neighbourhood Association (Eva Skinner)	<p>Quietways. Are being introduced despite residents opposition, when they were not part of any previous Local Plans. Introducing such measures in South Kensington, against strong local opposition, should be one of the subjects of this Local Plan Partial Review. Resident Associations should be involved in policy making. Currently RBKC come up with ideas, put those ideas out for consultation, but are reluctant to change the ideas because of the comments of Resident Associations; whereas if the Resident Associations were involved at the initial 'ideas' stage their comments would then be incorporated into the new idea and proposed with the backing of the Resident Association.</p>	<p>Proposed Quietways are subject to separate consultation by the Mayor of London and the Council (www.rbkc.gov.uk/cyclegrid) and will not be duplicated as part of the Local Plan Partial Review. Positive as well as negative responses were received.</p> <p>Policy CT1 'Improving alternatives to car use' was reviewed as part of the Miscellaneous Matters review, adopted in December 2014 and includes the text "The Council will ensure that there are better alternatives to car use by making it easier and more attractive to walk, cycle and use public transport...".</p> <p>No change.</p>
Norland Society (Clive Wilson)	<p>How to protect local business/employment/commercial and office premises against the pressure to convert into residential? How to avoid Kensington becoming a rich dormitory with no local shops and employment? How to maintain mixed neighbourhoods? - ensuring a mix of Social Housing/Housing association/affordable housing How to avoid absentee owners, and dark/empty properties only bought for investment/capital protection: could RBKC tighten up on marketing of new developments as Westminster has done? (Not sure where to include these strategic issues/needs)</p>	<p>These issues were considered in the Issues and Options consultation document and are part of the Draft Policies: Retail: Issues and Options section 6 'Shops and Centres' and Draft Policies Chapter 31 'Fostering Vitality' Business: Issues and Options section 7 'Business Uses' and Draft Policies Chapter 31 'Fostering Vitality'</p>

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		Housing: Issues and Options section 10 'Housing' and Draft Policies Chapter 35 'Diversity of Housing'
NTA Planning (Nicholas Taylor)	<p>I am sending this message as there is not a space on the form for the type of comment I wish to make.</p> <p>In summary, I find the Local Plan Review document quite overwhelming. There are three features that stand out:</p> <p>It is far too long; at over 300 pages how can you expect any but the most dogged person to go through it, and then comment? It is very badly written; there is far too much jargon; far too many long sentences and far too much use of the passive rather than active voice.</p> <p>As a result of these features there are many paragraphs in the document which are, frankly, unintelligible. To give you some examples of what I mean I refer you to the following:</p> <ul style="list-style-type: none"> • Jargon- Para 3.1.9 • Long sentences-Para 10.5.17, last sentence; Para 1.3.1 • Excessive use of passive voice- Paras. 1.1.1; 1.1.2; 1.2.1; 1.2.2; 1.4.2 • Dreadful English-Para 10.5.14 <p>Does this matter, I hear you ask. I believe it does because if a report is badly written people will either not understand it or they will lose interest. This defeats the purpose of consultation</p> <p>Please do not take these comments as negative criticism. I feel sure that there is scope for great improvement in the document</p>	<p>The Council is grateful to all those that took the time to read the consultation documents, attend Discussion Groups and submit responses.</p> <p>Noted for future consultations.</p>
John Eagle	<p>The Local Plan is so large a document that it is completely unreasonable to expect individual residents to wade through all of it to try to find the parts which affect them, and on which they would like to comment.</p> <p>I strongly suggest that the whole consultation process is deeply flawed</p> <p>...</p> <p>What does this mean - see my previous comments. If you wish to engage and consult with ratepayers, then a document as obtuse as this is entirely and completely the wrong way to go about it, unless you merely wish to have a "pretend" consultation</p>	<p>The Council is grateful to all those that took the time to read the consultation documents, attend Discussion Groups and submit responses.</p> <p>Noted for future consultations.</p>
Natural England (Susie Murray)	<p>Section 1. Introduction to the partial review</p> <p>Question 1 – Natural England notes that existing Local Plan Policy CE4 is not proposed for alteration. Whilst we have no particular objection to this we do wish to make the following comments in support of the inclusion of a specific green infrastructure (GI) Local Plan Policy.</p> <p>The provision of multi-functional green infrastructure (GI) offers benefits to the community, leisure, health and well-being. Multi-functional GI ensures open spaces are able to provide for both people and wildlife, able to provide a wide range of functions of benefit to the development and community. Such functions include improved flood risk management, provision of accessible green spaces, climate change adaptation, biodiversity and landscape enhancement (including better functionality of local ecological networks) as well as quality of life benefits for the local community (including health and economic well-being and access to wildlife).</p> <p>The provision of GI is supported by the National Planning Policy Framework (NPPF, DCLG March 2012), London Plan Policy 2.18 and The Mayor's All London Green Grid (ALGG) SPG.</p>	<p>Policy CE4 'Biodiversity' was reviewed as part of the Miscellaneous Matters review, adopted in December 2014. Infrastructure, including green infrastructure, is already part of the scope of the Local Plan Partial Review – see Issues and Options section 5 'Infrastructure and planning contributions' and Draft Policies Chapter 29 'Policies and Actions' and Chapter 37 'Infrastructure'.</p> <p>No change.</p>
Kensington Society (Michael Bach)	<p>UDP Policy TR44 is not covered by CT1 (b). This is about the net loss of on-street parking spaces which is much clearer test than a material increase in traffic congestion or on-street parking pressure. It also has to be related to the need to demolish front walls/railings and the need to pave over forecourts.</p> <p>Since we do not regard TR44 as being superseded by CT1(b) it remains to be incorporated in the consolidation of Saved UDP policies. There needs to be recognition, as in the UDP, that off-street parking often reduces the amount and flexibility of use of on-street parking whilst producing a smaller amount of private car parking. In addition it can result in the loss of front boundaries, which is damaging to conservation areas (CL9 is silent on this matter), whilst the issue of front gardens (33.3.19) and the policy on pavement crossovers and forecourt parking (CR4(g) on streetscape) does not deal with net loss of parking as a reason for resisting them. This is an unresolved issue and the Replacement Schedule is totally unsatisfactory.</p> <p>We would, therefore, like to maintain this representation. Please do not reject this representation on the basis that the Schedule says you have</p>	<p>UDP Policy TR44 has already been superseded by Local Plan Policy CT1(b):</p> <p>UDP Policy TR44 said: "Normally to resist development which would result in the net loss of on-street residents' parking. Proposals for additional residential off-street parking which result in a net increase in the number of spaces, may be permitted. Off-street parking must be</p>

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	<p>resolved the issue – it has not been resolved. It is further ground for refusal and is in line the NPPF which seeks to balance private gain against public losses.</p>	<p>able to accommodate all sizes of car and meet planning requirements”.</p> <p>Local Plan Policy CT1(b) says “require it to be demonstrated that development will not result in any material increase in traffic congestion or on-street parking pressure”.</p> <p>The existing Local Plan’s Policy Replacement Schedule (Chapter 41) made clear that TR44 was superseded by CT1(b).</p> <p>No change.</p>
<p>Bina Gardens (West) Garden Committee (Ms C Flanagan)</p>	<p>Further to the comments made by Michael Bach below, please could I offer my support for his views.</p> <p>I am a resident of Wetherby Gardens and am well aware of how much developers like cross overs to achieve off street parking. This is particularly true where new parking permits are no longer available.</p> <p>We have seen two crossovers granted in the immediate area, both of which designed in the off street parking space and then applied for the permission for a cross over in retrospect (Ashburn Place and Drayton Gardens.) We are aware that a major planning application is due to be submitted for 4 Wetherby Gardens, where there is no off street parking and, I gather, where they will not be granted a parking permit. Additionally, the developers of 25 Wetherby Gardens also applied for off street parking (which was refused, though a tree felling application suggests they may try again). These are 4 examples within 2 minutes walk of my front door, 3 of which would involve residents parking spaces being lost and the one which does not, is because it is on a corner. If this rate is replicated across the Borough, there will be few boundary walls or residents parking spaces left.</p> <p>We have to try and protect the integrity of our area: demolishing walls, removing railings and tarmac over front gardens will not in any way add to the local facilities or the beauty of our environment and it will inevitably lead to the loss of essential residents parking spaces, which presumably in turn will cause more congestion.</p>	<p>See above.</p>
<p>Alpha Plus Ltd (Richard Jones)</p>	<p>I write on behalf of my clients Delancey and Alpha Plus and in response the Royal Borough’s Local Plan Partial Review – Issues and Options consultation, which expires on the 9th February 2016.</p> <p>The consultation is the first stage of a review of the local plan and considers policy in the following topic areas: vision and strategic objectives; 'places'; site allocations; infrastructure and planning contributions; shops and centres; business uses and hotels; arts and cultural uses; rail infrastructure; housing; gypsy and traveller accommodation; housing standards; flooding; drainage and waste.</p> <p>As noted, excluded from the review are policies that relate to social and community uses and we consider represents a missed opportunity to evaluate the effectiveness of existing policy and in particular whether it is capable of accommodating all types of education needs in a way which is balanced against the competing needs for more residential and commercial floor space.</p>	<p>Policy CK1 ‘Social and Community Uses’ is not part of the Local Plan Partial Review. Infrastructure, including education infrastructure, is already part of the scope of the Local Plan Partial Review – see Issues and Options section 5 ‘Infrastructure and planning contributions’ and Draft Policies Chapter 29 ‘Policies and Actions’ and Chapter 37 ‘Infrastructure’.</p> <p>No change.</p>
<p>Historic England (Katharine Fletcher)</p>	<p>- Historic Environment evidence base</p> <p>Historic England welcomes Council's programme of updating the Conservation Area Appraisals and Management Plans across the borough. We suggest that once updated these will provide an essential source of information for identifying local heritage issues, as part of a positive heritage strategy. The appraisals provide an invaluable dimension for local plan policies ensuring that they are locally distinctive. Although principally addressing the 'architectural and historic interest' of each area, we have recommended that these encompass some archaeological content, as this will assist in identifying greater time depth in features such as plot boundaries.</p> <p>The review of the borough's Archaeological Priority Areas (APAs) is progressing and the Greater London Archaeological Advisory Service (GLAAS) will be able to keep you informed as to when the draft areas will be available for your consideration. Once settled, they should be referred</p>	<p>The ‘Renewing the Legacy’ policies were reviewed as part of the Conservation and Design review, adopted in December 2014.</p> <p>Policy CL4 Heritage Assets – Listed Buildings, Scheduled Ancient Monuments and Archaeology and its supporting reasoned justification text</p>

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	<p>to in the relevant local plan policy and the areas shown, either on a map within the local plan, or accessed through a link in the plan.</p> <p>The NPPF requires local plans to set out a positive strategy for the historic environment (paras 126 and 158). It would be appropriate to consider providing an overview of the Borough's heritage to build on the information already assembled. Many boroughs have prepared borough-wide characterisation reports and this would be extremely valuable, based on defined 'character areas'. This type of approach could provide a rationale for the place-based policies in the plan. It also would provide a clear opportunity to set out the relationships with adjoining boroughs, especially where there may be potential cross-boundary impacts on the settings of heritage assets. Borough-wide characterisation reports also provide a framework within which to consider possible approaches to tall buildings. We would be pleased to discuss this further with you.</p>	<p>has been updated to reflect the latest APAs. Other elements of Chapter 34 'Renewing the Legacy' remain outside the scope of the Local Plan Partial Review.</p>
Cllr Judith Blakeman	<p>Introduction</p> <p>We are unhappy that this consultation document was issued in the two week run up to Christmas 2015 which effectively removed four weeks from the consultation period. The discussion groups and presentations were held at the very end of the consultation period, which was not an effective way of doing things. It meant residents had no time in which to reflect about the presentations or comments made at those meetings.</p> <p>We are also concerned that the presentations at some of the discussion groups were overly technical and inaccessible to lay people. Furthermore, some of the questions in the consultation document are incomprehensible to lay members of the public (including us). Much of our response here consequently does not fit neatly into the questions as they are posed.</p>	<p>The Issues and Options consultation was not required by the Regulations but the Council undertook it in accordance with its Statement of Community Involvement (SCI) and desire for effective public consultation.</p> <p>Statutory timescales for consultations are normally 4-6 weeks but the Council consulted for 8 weeks to take into account the Christmas break.</p> <p>Noted for future consultations.</p>
Cllr E Dent Coad	<p>This note includes comments which are in addition to the separate responses on neighbourhoods and borough-wide issues below. We have deleted sections that we do not understand or have specific comments on.</p> <p>We have heard from a number of residents that they feel the timescale for this consultation was inconsiderate. Opening a consultation just before Christmas, when many of us are away or occupied with family, effectively loses at least three weeks, which is not a good start and fuels the residents' regular complaint that it is deliberately timed to avoid engagement. In addition, given the complexity of what we are being asked to comment on, it would have been better to have the Issues and Options consultation meetings towards the beginning of this period, and for the whole timescale to have commenced in the new year. We note that one of these meetings was held the day before the closing date.</p>	<p>The Issues and Options consultation was not required by the Regulations but the Council undertook it in accordance with its Statement of Community Involvement (SCI) and desire for effective public consultation.</p> <p>Statutory timescales for consultations are normally 4-6 weeks but the Council consulted for 8 weeks to take into account the Christmas break.</p> <p>Noted for future consultations.</p>
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	<p>1.6 The Partial Review does not propose changes to RBKC policy on protection of pubs, this having been reviewed and established since 2010. The Forum welcomes the Council's willingness to use Article 4 Directions where pubs are at threat of change of use within the A use class. The Pig and Whistle pub in Bramley Road recently become a Co-op mini-market without (it would appear) any planning applications even for new signage.</p> <p>...</p> <p>2.0 SECTION 1 OF THE PARTIAL REVIEW DOCUMENT</p> <p>2.1 The StQW Forum welcomes the Partial Review exercise as a necessary (and in parts overdue) exercise in updating the 2010 Core Strategy. The pace of change and the intensity of development pressures in the Royal Borough are such that planning policies require frequent review to remain responsive and up to date.</p>	<p>Policy CK2 'Local shopping and other facilities which keep life local' was reviewed as part of the Pubs and Local Character review, adopted in October 2013. Article 4 Directions are not set through Local Plan policy but through a separate process. The Council has no current proposals to introduce Article 4 Directions for pubs but continues to monitor trends.</p> <p>No change.</p>
Marion Gettleson	<p>Dear Sirs</p> <p>A Response to RBKC's 2016 Public Consultation on the Local LDF Plan - Re: Portobello Road & Market</p> <p>*This consultation seems designed to fail - again. Despite my having been engaged in local planning issues for years, I received no notice of it till</p>	<p>Emails were sent to all those registered on the Planning Policy Consultations database, including to this email address.</p>

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	<p>about a week ago. Only professionals can respond. It seems to exist entirely online. Yet having ploughed through the papers online, I find I cannot respond to the questions in what I take to be the appropriate boxes.</p> <p>*The consultation also seems designed to exclude those without internet/email. This will doubtless be immigrants, the elderly and those on low incomes.</p> <p>*I've found it impossible to work out what to respond to, or how to respond online. The email version is equally incomprehensible, so I'm reduced to largely repeating some of the random comments I made at last week's public meeting.</p>	<p>Anyone can sign up for updates at Planning Policy Consultations and the Planning Direct Bulletin.</p> <p>A postal address for consultation responses was provided as part of the consultation.</p> <p>The Council is grateful to all those that took the time to read the consultation documents, attend Discussion Groups and submit responses.</p> <p>Noted for future consultations.</p>
	<p>*I've confined my comments to an area I've been familiar with for almost 60 years. Responses:</p> <p>*The original 2005/6 LDF public consultations resulted in overwhelming public support for reopening the Borough's public lavatories. Second most popular issue was huge public support for Portobello Market. As a result, the entire 'consultation' was scrapped and when the replacement was begun, no mention was made of the chronic lack of public lavatories, nor of the special affection of the public for Portobello Market.</p> <p>*The public lavatories in Talbot Road were restored and have been reopened - but only on Fridays and Saturdays. This is inadequate. It is surely possible to allow a private firm to keep them open all week.</p> <p>*The lavatories under the Westway must also be reopened and maintained. India has a programme to provide adequate facilities, so should RBKC.</p>	<p>Noted for future consultations.</p> <p>Not considered relevant to the scope of the Local Plan Partial Review.</p> <p>No change.</p>
Christian Durie	<p>Much better advertising of Consultations - all rate payers should be informed of consultations. It should not be just left to chance to hear about them.</p> <p>If the Council truly wants to hear from residents it needs to address them coherently. Much of the Planning Review is in extraordinary 'Inspeak' to the council. E.G. 'realms', 'Town Centres', 'places'.</p> <p>Use simple English that can be easily understood.</p> <p>Access to the information is lamentably complicated. Just so much 'Inspeak'. I only know about the policies and information that was discussed at the two meetings I attended.</p>	<p>Emails were sent to all those registered on the Planning Policy Consultations database, including to this email address.</p> <p>Anyone can sign up for updates at Planning Policy Consultations and the Planning Direct Bulletin.</p> <p>A postal address for consultation responses was provided as part of the consultation.</p> <p>The Council is grateful to all those that took the time to read the consultation documents, attend Discussion Groups and submit responses.</p> <p>Noted for future consultations.</p>
Kerry Davis-Head	The individual questions are difficult to answer online without a printed copy of the whole document	Printed copies of the consultation documents were available upon request.
Silchester Residents Association (Jo Poole)	<p>Overall notes and comments This response was written by a group of 11+ residents from the Silchester Residents Association. Leaseholders, private and TMO tenants were all represented.</p>	The Council is grateful to all those that took the time to read the consultation documents, attend

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	<p>We found the timeframe of the consultation too short to organise a balanced response to such a large document from a group of people with extensive work and family commitments. Advance notice of a longer consultation would have helped us. Furthermore, the manner in which the consultation was advertised placed the onus on residents to be aware of the consultation and to proactively seek out information. The Council should have been doing more to make residents aware of the consultation and also to clearly explain the significance of the local plan for the future of the borough and its residents.</p> <p>The language used throughout the partial review and questions (as well as the adopted plan), length of document and information about submitting a response all formed barriers to resident engagement that is not acceptable. As such, we have only answered what we felt able to do adequately and have deleted the other questions so our document is easier to read for those collating the information.</p>	<p>Discussion Groups and submit responses.</p> <p>Noted for future consultations.</p>