

Local Plan Partial Review

Issues and Options

Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Section 2: Vision and strategic objectives

Issue 1: Vision and strategic objectives

Question 1: Is the existing Local Plan's vision (see section 2.2) appropriate in guiding the Local Plan Partial Review? If not, what changes should be made?

Name	Comment	Council's Response
Charles Bezoari Elder	Again...this section talks a lot about "achieving diversity of housing"- this can be achieved without adding a single new house/flat. The objective should be" to increase dramatically the number and type of new housing in the borough".	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
Norland Society (Clive Wilson)	Not sure if they cover our points made above specifically enough: ie 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)	These issues are generally already covered in the strategic objectives and/or in the topic chapters. See Draft Policies Chapter 31 'Fostering Vitality' and Chapter 35 'Diversity of Housing'. New paragraph 3.2.9 has been amended to emphasise affordability for local people.
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	2.3 Policy CV1 and the Borough's overall vision are currently expressed as <i>Our vision for Kensington and Chelsea over the next 20 years is to build on success.</i> For many RBKC residents the concept of current 'success' in terms of planning policies can be seen as overly complacent as the main 'vision' of the Local Plan. While the Borough has much to be proud of in terms of its heritage, vitality, and its physical environment there remain enormous challenges. For parts of the north of the Borough (and elsewhere) the position on access to housing, public transport accessibility levels, and access to good quality local amenities set within vibrant and attractive 'places' still has a long way to go. 2.7 Paragraphs 2.4.1 to 2.4.13 include a list of quotes from the Council's 2014 ' <i>Ambitious for Tomorrow</i> ' document. If the intention is to include these in an updated CLP, their wording needs to be reviewed with care. The assertion that ' <i>Some of our estates date from the 60s and 70s and exhibit all the faults of that far from golden era of public architecture</i> ' is simplistic in that in terms of space standards and the level of availability of social housing, the 60s and 70s are rightly seen by many as a 'golden age'. Similarly the statement that ' <i>It should be possible to transform the conditions in which many of our existing tenants live. The difference between a social home built as part of a 1960s estate and one built today in a street-front property integrated into the wider neighbourhood really is that dramatic</i> ' is an aspiration that the Council needs to be very confident of delivering, if it wishes to avoid raising expectations that cannot be fulfilled. Question 1 Is the existing Local Plan's vision (see section 2.2) appropriate in guiding the Local Plan Partial Review? If not, what changes should be made? - see above at 2.3 on the RBKC 'vision'	Noted.
Roy Burns	Appropriate	Noted.
NTA Planning (Nicholas Taylor)	The vision should include the need to facilitate/maximise opportunities to provide additional dwellings in the Borough	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".

Name	Comment	Council's Response
Victoria and Albert Museum (Steve Hyde)	<p>There should be another strategic objective relating to the plan's vision identified in paragraph 3.16 stating that: "The Royal Borough's national and international cultural institutions to be supported and protected." This additional strategic issue would then complement Policy CV1 which is to "enhance the reputation of our national and international destinations."</p> <p>The V&A is located within the South Kensington Strategic Cultural Area which is of national and international importance and this is not recognised in the Local Plan's vision and strategic objectives.</p>	<p>The supporting text (new paragraph 3.2.5) for the strategic objective of 'Fostering Vitality' has been updated to reflect the importance of world class institutions and their support and protection.</p> <p>The Key Diagram has been updated to show the South Kensington Strategic Cultural Area.</p>
Exhibition Road Cultural Group (Emily Candler)	The national and international significance of the South Kensington Strategic Cultural Area should be recognised in the Local Plan's vision and strategic objectives. The strategic objective should include protecting and enhancing the national and international cultural and educational institutions in the Borough. This would complement Policy CV1 – to enhance the reputation of our national and international destinations.	See above.
Jo Poole	<p>The existing local plan's vision appears to promote the social and ideological cleansing of the north of the borough. The agenda of market housing and endless retail frontage takes no account of existing communities.</p> <p>The post-war housing and buildings throughout the borough are the heritage of the future. The Worlds End estate and Trelick tower are already celebrated for their design and innovation. There are many other blocks and developments that should be maintained and preserved to form part of your vision of RBKC heritage in the future.</p>	<p>The existing and proposed Local Plan's vision does not support such agendas.</p> <p>The 'Renewing the Legacy' objective and chapter sets out the Council's policies for heritage, conservation and design.</p>
Cheyne Walk Trust (David Waddell)	<p>Broadly the vision is supported.</p> <p>The CWT does wish to see the River Thames treated as a single area of consideration under CR5 Parks, Gardens, Open Spaces and Waterways and given more than partial or incidental consideration.</p>	Noted.
Turley (Ian Fergusson)	<p>A key focus for RBKC's Local Plan must be achieving the housing target set out in the London Plan. The current vision refers to 'providing for new residential development in a way which diversifies tenure patterns and house sizes'.</p> <p>In contrast, a strategic objective in Westminster City Council's City Plan is 'to increase the supply of good quality housing across all parts of the city to meet Westminster's housing target, and to meet housing needs, including the provision of affordable housing and homes for those with special needs'. WCC Policy S14 Optimising Housing Delivery turns this objective into policy and states inter alia that 'the council will work to achieve and exceed its borough housing target set out in the London Plan' and 'residential use is the priority across Westminster except where specifically stated'.</p> <p>Past experience suggests that if RBKC is to achieve its housing target then its development plan policies must be more explicitly supportive of the delivery of new homes. It should indeed acknowledge that the delivery of new homes will frequently be a more important planning consideration than perceived harm in terms of other development plan policies or material considerations. An example could be allowing the delivery of a new home where there is perceived to be limited harm to the character or appearance of a conservation area.</p> <p>If RBKC is to achieve its housing targets then its Officers must be empowered by development plan policy to accept that in many instances such perceived limited harm should be accepted on the basis that the local planning authority achieving its housing targets is of significant and strategic importance. The Council has already accepted and employed very similar arguments since taking its current position (taken since the Plan itself was adopted) on why the amalgamation of existing homes should generally be resisted.</p> <p>RBKC should adopt a similar if not identical approach to WCC.</p>	<p>The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".</p> <p>Policy CP1 Core Policy: Quanta of Development has been amended to state "seek to meet and exceed the London Plan target for new homes in the borough".</p>
Austin Mackie Associates Limited (Private Clients)	In addition, CV1 should state that the Borough will work with both businesses and residents to ensure that accommodation is available / adaptable to suite their future needs	Existing Local Plan Policy CV1 Vision for the Royal Borough: Building on Success already states we will work "in partnership with other organisations, and importantly with our residents".
Kensington Society (Michael Bach)	Question 1: Is the existing Local Plan's Vision appropriate in guiding the Local Plan Partial Review? This needs to be reviewed – we would like to look at this again in the light of this consultation	Noted.

Name	Comment	Council's Response
Earl's Court Partnership Ltd (ECPL)	Para 2.2.5 Should be expanded to cover the delivery of an increased quantum of housing i.e. meeting housing need. Para 2.3.6 Section should reference the current review of the NPPF.	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
Cllr Judith Blakeman	The first bullet point in the existing Policy Vision CV1 should be amended to read: • Stimulate regeneration in North Kensington while ensuring that the settled community retains the right to a new or refurbished home within the area.	Existing Local Plan Policy CH4 Estate Renewal subsection (b) states "require a guarantee that all existing tenants have an opportunity of a home that meets their needs, with those wishing to stay in the neighbourhood being able to do so".

Question 2: Are the existing Local Plan's objectives (see section 2.2) appropriate in guiding the Local Plan Partial Review? If not, what changes should be made?

Name	Comment	Council's Response
Charles Bezoari Elder	"Providing for " is not the same as "Completing the construction of significant new housing developments" to respond to growing demand across the borough.	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
Sonia Richardson	Yes	Noted.
J Neville	Do these objectives take into account the effect of the Licensing Act 2003? Please see Issues and concerns previous section	The objectives have all been drafted post-2003.
Roy Burns	Appropriate Would like to see the development of Pelham Street added as an objective in 2.2.3	Existing Local Plan Policy CV1 Vision for the Royal Borough: Building on Success already includes an objective to "Enhance the reputation of our national and international destinations" which includes "South Kensington".
NTA Planning (Nicholas Taylor)	You should delete 'Keep life local' because it smacks of nimbysm and does not seem to be a relevant planning objective. 'Renew our legacy' needs re wording as it is very vague and ambiguous	The Council still considers that Keeping Life Local and Renewing the Legacy are still appropriate objectives.
Victoria and Albert Museum (Steve Hyde)	There should be another objective which is to: "To support and protect cultural institutions" The V&A is located within the South Kensington Strategic Cultural Area which is of national and international importance and this is not recognised in the Local Plan's strategic objectives.	The supporting text (new paragraph 3.2.5) for the strategic objective of 'Fostering Vitality' has been updated to reflect the importance of world class institutions and their support and protection. The Key Diagram has been updated to show the South Kensington Strategic Cultural Area.
Exhibition Road Cultural Group (Emily Candler)	2) As above, there should be a specific objective relating to protecting and enhancing the world class cultural and academic institutions in the Borough	See above.
Jo Poole	Adding a requirement for transparency and accountability in dealing with speculation and development, particularly when it concerns publically owned land.	A number of supporting text paragraphs have been added into Chapter 35 'Diversity of Housing' to

Name	Comment	Council's Response
		cover viability.
Turley (Ian Fergusson)	See comment above.	Noted.
Christian Durie	Air Quality should be addressed. This could be done by better control of illegal parking on the main artery. Not a Planning Issue as such but it is a Council one so some Joined up Thinking would help. Loading and parking on the King's Road appears to be far less controlled between Beaufort Street and World's End than in the residential streets on either side. As there are bus stops and bus lanes and an exclusive right turn down to the river the illegal parking brings traffic to a snail's pace at best and halt at worst, increasing emissions unnecessarily.	<p>Existing Local Plan Policy CV1 Vision for the Royal Borough: Building on Success already states "air quality... will have been significantly improved".</p> <p>Existing Local Plan CO7 Strategic Objective for Respecting Environmental Limits already states "improve air quality... within the borough".</p> <p>The supporting text relating to air quality in Chapter 36 'Respecting Environmental Limits' and Policy CE5 Air Quality has been updated to provide factual updates and clarifications.</p>
Royal Brompton & Harefield NHS Foundation Trust (RBHT)	Further recognition of need to meet housing targets is required.	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
ESSA (Anthony Walker)	Question 2 They have been useful but perhaps should involve a clearer vision. For the implementation of detail it is essential that the policy be detailed!	Policy CV1 Vision for the Royal Borough: Building on Success has been amended.
Kensington Society (Michael Bach)	Question 2: Are the existing Local Plan Objectives appropriate in guiding the Local Plan Partial Review? The Society considers that, although the general tone of the vision and the strategic objectives are broadly appropriate, they should be revisited during the next phase.	Policy CV1 Vision for the Royal Borough: Building on Success and the strategic objectives have been amended as part of the Draft Policies.
Historic England (Katharine Fletcher)	<p>As the Government's statutory adviser Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.</p> <p>The National Planning Policy Framework identifies the historic environment as a relevant matter contributing to sustainable development (para 7), and includes it within the core planning principles (para 17). National policy advocates an active, positive approach to the historic environment (paras 126 and 157) and recognises the value that the historic environment can bring to inspire high quality design in new development (paras 58 to 61). The following comments are made in the context of the principles contained in the NPPF and the accompanying Planning Practice Guide (PPG).</p> <p>We were very pleased to have the opportunity to meet you and your colleagues on 3 December 2015 to discuss a range of issues, including the Royal Borough's Archaeological Priority Areas review and specific issues relating to the local plan and neighbourhood plans. We look forward to continuing this dialogue as you progress the local plan review.</p> <p>The review document is extremely thorough and we have sought to address just a few of the key issues in the consultation. These fall into the following themes, most of which were mentioned when we met.</p> <p>- Sustainable development The adopted local plan has been brought forward at various stages and it will be important to ensure that the next plan is fully consistent with the National Planning Policy Framework and accompanying guidance. The plan should make clear that sustainable development encompasses economic, social and environmental issues and that the historic environment is a key consideration within the environmental dimension. The</p>	<p>The supporting text in Chapter 34 'Renewing the Legacy' and Policy CL4 Heritage Assets have been updated to reflect Historic England's latest Archaeological Priority Areas and guidance for the Borough.</p> <p>Paragraph 2.3.16 has been amended to make clear that the historic environment is a key consideration within the environmental dimension</p>

Name	Comment	Council's Response
	<p>significance of Kensington and Chelsea's historic environment is such that its conservation and enhancement is both of local and also London-wide importance. This significance justifies particular attention in the strategic policy content of the local plan.</p> <p>...</p> <p>Historic England is the Government's statutory adviser on all aspects of the historic environment and a statutory consultee for the Strategic Environmental Assessment of Plans. Accordingly we have reviewed this consultation in the context of the National Planning Policy Framework (NPPF) and its core planning principle that heritage assets are to 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.</p> <p>As set out in our response to the Issues and Options for the partial review, we are keen to see a positive strategy for the historic environment integrated into the plan, in accordance with the requirements of the NPPF (para 126). Thus, while the partial review does not address the recently reviewed conservation policies, it is important that the likely effects for the historic environment of the policies currently being examined are understood. A positive strategy will depend on the integration of heritage issues into a broad range of policies and cannot be effective through conservation policies alone.</p>	<p>of sustainable development.</p> <p>Historic environment and conservation issues are a key sustainability criterion in the emerging Integrated Impact Assessment (IIA) published as part of the Local Plan Partial Review.</p>
Earl's Court Partnership Ltd (ECPL)	Not enough recognition of the need to deliver more homes to meet relevant housing targets.	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
Onslow Neighbourhood Association (Eva Skinner)	2.2.2 'Improving travel choices to reduce car dependency,' seems to discriminate against car owners, who are a useful source of revenue (through parking charges) to RBKC, and a vital piece of equipment for busy residents. If this were not so there would not be such a demand for residents parking. A better strategic objective would be: 'Improve mobility, by regular monitoring of traffic lights to keep pace with traffic congestion and difficult pedestrian crossings'	The Council considers that the existing CO3 Strategic Objective for Better Travel Choices is appropriate for a strategic objective and no changes are proposed.
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	<p>2.2 In para 2.2.2 of the Partial Review document the fifth of the strategic issues could be slightly expended to read <i>Reducing the environmental impacts of everyday activities in the borough to better fit within environmental limits, including London-wide targets for air quality</i>. Public concern on air quality has moved up the agenda since 2010 in the light of available evidence that London's current performance leaves its citizens at risk of serious detriment to health.</p> <p>Question 2 Are the existing Local Plan's objectives (see section 2.2) appropriate in guiding the Local Plan Partial Review? If not, what changes should be made? -- see above at 2.2. on adding air quality.</p>	<p>Existing Local Plan Policy CV1 Vision for the Royal Borough: Building on Success already states "air quality... will have been significantly improved".</p> <p>Existing Local Plan CO7 Strategic Objective for Respecting Environmental Limits already states "improve air quality... within the borough".</p> <p>The supporting text relating to air quality in Chapter 36 'Respecting Environmental Limits' and Policy CE5 Air Quality has been updated to provide factual updates and clarifications.</p>
Port of London Authority (Helena Payne)	<p>The Port of London Authority is the statutory harbour authority for the tidal Thames between Teddington and the Thames Estuary. It's statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movements and it's consent is required for the carrying out of all works and dredging in the river and the provision of moorings. As the body responsible for licensing river works and moorings, the PLA has a special regard to their continued viability for unimpeded use by the PLAs licenses. The PLAs functions also include for promotion of the use of the river as an important transport corridor to London.</p> <p>1) Vision & Strategic Objectives</p> <p>The aims and objectives of the Local Plan is to (amongst other matters):</p> <ul style="list-style-type: none"> - protect local uses and those that are important to the vitality of the borough from potential loss to the higher values commanded by residential land uses; - Improve travel choices to reduce car dependency; - Reducing the environmental impacts of everyday activities in the borough. <p>These objectives are supported by National Policy and Guidance, and the aims set out within the London Plan and remain of relevance to</p>	Noted.

Name	Comment	Council's Response
	<p>planning.</p> <p>In terms of 'improvements to travel choices' to reduce car dependency and reducing the environmental impacts of everyday activities, these aims and objectives are compliant with the provisions set out within the National Planning Policy Framework (NPPF) and other Policy considerations. In terms of transport, it is the Borough's objective to further improve transport, especially with the introduction of the new Crossrail links. The document sets out a number of challenges and opportunities to improve transport and infrastructure. There is some mention of the use of the river to assist in this regard, and this should be built upon. The River Action Plan and London Plan itself assert the importance of promoting sustainable travel (which would also accord with the provisions set out within the NPPF). In terms of the consultation documents, further consideration should be given to the promotion of river based transport, which would accord with the River Action Plan (February 2013). The River Action Plan (2013) outlines a number of specific measures to be taken by Transport for London (TfL) and other stakeholders to help boost the number of river trips.</p> <p>The PLA would like to see consideration given to the use of the River Bus within the Borough's Transport Policy considerations. The need to reduce our carbon footprint and establish sustainable communities is paramount within National Policy. The use of the river as an alternative transport method would therefore aid in promoting the objective of sustainable communities and reducing environmental impacts within the Borough.</p>	<p>The River Action Plan document has been added into the 'Better Travel Choices' section of Chapter 43 Evidence Base.</p> <p>Existing Local Plan Policy CR5 Parks, Gardens, Open Spaces and Waterways subsection (h) already states "require opportunities to be taken to improve public access to, and along the Thames... and promote [its] use for... transport".</p>
ESSA (Anthony Walker)	Question 1 CO5 The aim here is to hand on something for the future which is actually better than the existing. In 2.2.2 that objective appears to have been watered down to that of just protecting and being equivalent to that which now exists. We believe that CO5 should be referred to as the objective.	The strategic objectives have primacy over any supporting text. Existing Local Plan CO5 Strategic Objective for Renewing the Legacy states "to pass to the next generation a borough that is better than today".
Cllr Judith Blakeman	Paragraph 2.2.2 is more or less acceptable but could do with more emphasis on environmental improvements and addressing in particular the notoriously poor air quality across the Borough.	<p>Existing Local Plan Policy CV1 Vision for the Royal Borough: Building on Success already states "air quality... will have been significantly improved".</p> <p>Existing Local Plan CO7 Strategic Objective for Respecting Environmental Limits already states "improve air quality... within the borough".</p> <p>The supporting text relating to air quality in Chapter 36 'Respecting Environmental Limits' and Policy CE5 Air Quality has been updated to provide factual updates and clarifications.</p>

Question 3: Is the existing Local Plan's Key Diagram (see Figure 2.1 appropriate for the Local Plan Partial Review? If not, what changes should be made?

Name	Comment	Council's Response
Charles Bezoari Elder	P.17,if that is what you refer to in this question, is meaningless, as is the one on P.19	The Key Diagram is important in setting out the spatial vision for the Borough.
Onslow Neighbourhood Association (Eva Skinner)	Figure 2.1 is a very messy Local Plan that tries to show too much, and in so doing presents something that has limited value. Much better to select groups of subjects that interact and put those onto one plan, and other groups onto other plans.	The Key Diagram has been amended as part of the Draft Policies.
Sonia Richardson	yes	Noted.

Name	Comment	Council's Response
J Neville	See Issues and Concerns previous section	Noted.
Roy Burns	Appropriate	Noted.
NTA Planning (Nicholas Taylor)	I am not convinced that the Key Diagram should include Conservation Areas. I do not regard them as a strategic constraint; they are more akin to a local spatial policy such as 'Area deficient in open space' or 'Area with low PTAL value'	The Council considers that conservation areas are a strategic issue for the Key Diagram as they cover 73% of the Borough.
Victoria and Albert Museum (Steve Hyde)	The Key diagram should also include the South Kensington Strategic Cultural Area to cross reference to policy CF11.	The Key Diagram has been amended to include the South Kensington Strategic Cultural Area.
Exhibition Road Cultural Group (Emily Candler)	3) The Key Diagram of Local Plan (Figure 2.11) should include South Kensington Strategic Cultural Area.	The Key Diagram has been amended to include the South Kensington Strategic Cultural Area.
Jo Poole	The wholesale regeneration should not be indicated without a clear and binding definition.	Noted.
Sainsbury's Supermarkets Ltd (Indigo Planning)	Sainsbury's support the identification of the site as a regeneration area, possible new centre, new station, broad location for development as shown in Figure 2.1. However, the word 'possible' should be deleted in relation to the new centre and clarification should be provided as to the specific type of centre proposed. The key and map should be amended to identify the sites potential to deliver future housing requirements. Sainsbury's welcomes the Council's determination to secure a new rail station at Kensal Portobello at paragraph 2.4.5.	Any new centre should support the day to day needs of development at Kensal. The Key Diagram has been amended to include the site allocations.
Kerry Davis-Head	It is too generic and doesn't quite relate to the individual maps It needs to be simplified and updated, a new survey of areas made and less generic annotations made. Actual site visits would highlight that some changes are not possible	The Key Diagram has been amended as part of the Draft Policies.
ESSA (Anthony Walker)	Question 3 Site allocations would be better placed elsewhere due to the rate of change in possible sites and the impact on their areas. We may be misreading the diagram but it appears that the Central Activity zone covers much of Kensington Gardens but does not extend down the High Street to the Design Museum. In our opinion it is essential that the western end of the High Street be included.	The Council does not consider it appropriate to extend the Central Activity Zone (CAZ) boundary westwards. Kensington High Street is identified as a Major centre in itself.
Barton Willmore (Paul Newton)	Issue 1 - Question 3 (Key Diagram) 5. We support the identification of the regeneration area; broad location for development; a new station; and the identification of a 'possible new centre' relating to the Site. 6. However, given the importance of the Site in meeting future housing requirements in the Borough, it is considered appropriate to specifically identify the Site on both the Diagram and Key. Clarification is also required over the specific type of Centre in the hierarchy. In order to provide certainty, the reference to 'possible' should be removed. Paragraph 2.4.5 7. We support the Council's ambition for the new Kensal Portobello Crossrail Station and comment on this in more detail in respect of Chapter 4 below.	The Key Diagram has been amended to include the site allocations. Any new centre should support the day to day needs of development at Kensal.
Kensington Society (Michael Bach)	Is the existing Local Plan's Key Diagram (see page 19) appropriate for the Local Plan Partial Review? This needs to be at a larger scale with a base map.	The Key Diagram has been amended as part of the Draft Policies.
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	Question 3 Is the existing Local Plan's Key Diagram (see Figure 2.1) appropriate for the Local Plan Partial Review? If not, what changes should be made? Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section? - see above at 2.4 to 2.6 on strategic policies and neighbourhood planning. No comments on Issues 3 and 4.	Noted.

Question: Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Name	Comment	Council's Response
Charles Bezoari Elder	<p>585 new dwellings per annum is woefully inadequate. Not only is it a "drop in the bucket" of what is needed/demanded, but it truly pales into insignificance when compared to the magnificent plans for space for other non-residential use like offices, shops etc.</p> <p>This is contrary to the National Govt's objectives for Housing. It also violates the Plan's own principles to "respond to residents' needs", and be "locally driven". Local residents have no real need for further office space, nor for hotels, nor for shops, etc- what we need is more housing. And yet the Council is behaving as though its primary purpose in life is to further develop an already bloated retail offering; a high density of office space etc. These attract thousands of non-residents to our area with consequent negative impact on the cleanliness of our streets, parking availability for residents; congested roads and pavements; noise levels; antisocial behaviours of all kinds into the late hours of the night etc etc. Not included in this list of problems are- the congestion in High st. Kensington Tube station, which is at a level of danger; congested buses, cyclists riding on the pavements and so on. There is limited access to the platforms at the above tube station and thousands of people trying to go up the single staircase from platform 2 at the same time as thousands are trying to go down onto the platform. TFL continues to ignore all calls for more staircases, and safer access. What is the Council doing about this?</p>	<p>Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733.</p> <p>The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".</p> <p>The Council has published an update to its Retail and Leisure Needs Assessment (RLNA). Policy CP1 Core Policy: Quanta of Development has been amended to decrease the retail 'target' from 26,150sqm to 9,700sqm of retail floorspace.</p> <p>The Council would support the delivery of additional staircases or escalators at High Street Kensington Underground Station but it cannot require Transport for London to do this.</p>
J Neville	Please see Issues and Concerns previous section	Noted.
Kerry Davis-Head	It is too full of corporate speak	Noted.
ESSA (Anthony Walker)	We consider that key sites should have a Design Statement SPD to give guidance but that it needs to be produced at a very early stage. The time scale for revising the Local Plan is too cumbersome to be included within the Local Plan. All too often the SPD comes too late; an example being the Commonwealth Institute where the SPD was only produced a day before the planning committee which then went against its recommendations.	The Council's programme for introducing further Supplementary Planning Documents (SPDs) is set out in the Local Development Scheme (LDS) available at: www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-development-scheme
Greater London Authority Development (Stewart Murray)	Vision The Local Plan's vision, objectives and key diagram still appear appropriate to the Mayor.	Noted.
Earl's Court Partnership Ltd (ECPL)	Need to recognise key changes in national policy in parallel with this exercise.	All topic areas of the Local Plan Partial Review have been considered in light of changes in national policy.

Issue 2: The duty to cooperate and neighbourhood planning

Question 1: Is the existing Local Plan's definition of strategic objectives and strategic policies (see above, section 2.2) fit-for-purpose for the duty to cooperate and neighbourhood planning? If not, what changes should be made?

Name	Comment	
Charles Bezoari Elder	<p>Again- the Plan does not respond to the needs of local residents. We want lots more housing; Safer streets; a better Tube station; less congestion of streets and pavements; cleaner streets (currently a disgrace in terms of litter). More Doctors' surgeries- why not allocate space for this in the underused Central Library?</p> <p>Too much of the Plan is geared towards people who do NOT live in the borough, but who will come here to work,shop,eat, etc. By definition this</p>	The Council has published an update to its Retail and Leisure Needs Assessment (RLNA). Policy CP1 Core Policy: Quanta of Development

Name	Comment	
	reduces the quality of life of the residents who are left with the problems, litter, congestion, poor air quality, petty crime and so on. Stop building Retail and Office parks, and start building more Housing, schools, medical/dental facilities.	has been amended to decrease the retail 'target' from 26,150sqm to 9,700sqm of retail floorspace. The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development".
Gerald Eve (Nick Miller)	Yes	Noted.
Jo Poole	No. Steps should be taken to deserve the trust of communities which need to be safeguarded in any development process.	Noted.
St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	2.4 The StQW Forum welcomes the explanation in 2.2.7 and 2.28 of the Partial Review document on the need for the Council to identify its 'strategic' policies so as to assist with neighbourhood planning. The Forum considers the approach at 29.1.3 of the current CLP (as introduced via the Miscellaneous Matters partial review) to be workable as a means of defining 'strategic' policies. 2.5 This approach needs to be consolidated as an outcome of this further Partial Review, by e.g., distinguishing the initial and 'strategic' paragraph(s) of individual CLP policies by use of a different colour or typeface (and ensuring that the relevant text of the CLP has regard to NPPG advice on what makes a policy 'strategic'). 2.6 The Forum also welcomes the text on neighbourhood planning at 2.3.11 to 2.1.5 of the Partial Review document and assumes that this will be included in an updated CLP? This will provide greater clarity for any residents association or amenity society embarking on a neighbourhood plan.	Existing Local Plan paragraph 29.1.3 (now 29.1.2) has been amended to include explicit reference to Neighbourhood Plans and signposts the full guidance in the National Planning Practice Guidance on Neighbourhood Plans.

Question 2: Should some policies be considered strategic in their entirety? If so, which ones?

Name	Comment	Council's Response
Charles Bezoari Elder	Housing should be number 1. Space for Doctors surgeries; dental surgeries; schools; and the needs of an aging population number 2. Public Transport- pressure on TFL. Cleanliness of our streets and parks- these are awful. Why are Littering fines not enforced??? The Council makes a fortune from Parking fines- why not littering fines. From the daily filth I see in our streets this would be a major money maker.	The strategic objective for Diversity of Housing has been amended to "boost the supply of housing to further the aim of sustainable development". Chapter 29 Policies and Actions and Chapter 37 Infrastructure have been updated to demonstrate how the Local Plan can support the delivery of infrastructure in the Borough.
Sonia Richardson	Crossrail 2 is strategic-I absolutely believe that we must have a Crossrail 2 station in Chelsea-we will be left behind commercially if we don't. I am less worried about where it is situated than about losing the opportunity to have a station	Policy CV1 Vision for the Royal Borough: Building on Success has been updated to reference Crossrail 2.
Victoria and Albert Museum (Steve Hyde)	Policies CF7 (Arts and Cultural Uses) and Policy CF11 (The South Kensington Strategic Cultural Area. See response to Question 1.	Noted.
Kensington Society (Michael Bach)	Question 2: Should some policies be considered strategic in their entirety? Certain housing policies, protection of social and community uses and offices.	The approach has been confirmed in existing Local Plan paragraph 29.1.3 (now 29.1.2).

Question: Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

No comments received.

Issue 3: Quanta of development

Question 1: Other than those topic areas set out above (which are dealt with separately in the corresponding sections of this consultation document), what other changes should be made to Policy CP1 'Quanta of development'?

Name	Comment	Council's Response
Charles Bezoari Elder	Clearly more housing is needed, far beyond the plan's unambitious 585 dwellings a year. In addition, the plan should re-visit the permitted height of the current housing stock. The current frenzy of basement digging is a result of the need for more space, combined with a punitive stamp duty regime that "freezes" occupancy by reducing the ability of people to move up to a bigger property. No one wants to live in a basement. No one with freedom of choice believes that a basement is the ideal solution for their need for extra bedrooms. The basement great dig is the only economically sensible answer to residents' need for more space. An alternative would be to allow new housing to be built which adds a floor or 2, in a sensible manner to an existing footprint. This would create the new space for expanding families, and eliminate the basement craze, as it is more attractive to live with more light, rather than less. The quanta should incorporate a plan to allow for a rise in the number of floors in a careful and controlled way.	Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733. The existing Local Plan Policy CL8 Existing Buildings – Roof Alterations / Additional Storeys is not part of the scope of the Local Plan Partial Review.
Norland Society (Clive Wilson)	Not sure that the "Quanta" given are specific enough in relation to eg - mix of housing - small business premises - premises for small retailers (eg what does "sufficient" mean?)	More detailed policies on business/retail premises and housing mix can be found in the Local Plan Chapters 31 'Fostering Vitality' and 35 'Diversity of Housing' respectively. Policy CP1 Core Policy: Quanta of Development has been amended to remove the previous subsection (c) with reference to "sufficient".
NTA Planning (Nicholas Taylor)	I found this whole section virtually unintelligible!	Noted.
Jo Poole	The council's strategic sites are meaningless without a commitment to balance developer viability, profit and off--shore marketing with genuine social need. See previous comments about 50% affordable housing and a clear definition of this related solely to income.	A number of supporting text paragraphs have been added into Chapter 35 'Diversity of Housing' to cover viability and affordable housing.
Turley (Ian Fergusson)	The quantum of new housing will of course need to be amended to reflect the London Plan target.	Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733.
Austin Mackie Associates Limited (Private Clients)	Policy CP1 should acknowledge that housing targets incorporate qualitative elements, for example, the housing target is not simply a numerical figure, but a target that requires a qualitative response in terms of a mix of housing types, including family homes.	More detailed policies on housing mix can be found in the Local Plan Chapter 35 'Diversity of Housing'.
Catalyst Housing (Martyn Freeman)	While we do not consider any additional topic areas should be dealt with in this policy, in accordance with the NPPF objective of boosting significantly the supply of housing, CHL considers that housing quanta in this policy should continue to be referred to as minima.	Policy CP1 Core Policy: Quanta of Development has been amended to state "seek to meet and exceed the London Plan target for new homes in the borough".
Royal Brompton & Harefield NHS Foundation Trust (RBHT)	CP1 part c. should not be so restrictive in allocating Sites in the South of the Borough only for retail development. The Council should also envisage other priority uses including medical and associated facilities and housing.	Policy CP1 Core Policy: Quanta of Development has been amended to remove the previous subsection (c).
Kensington Society (Michael Bach)	Issues 3: Quanta of development: There is a need to review the objectively-assessed need for all main uses.	Objectively assessed need has been reviewed for all main uses within the following published documents:

Name	Comment	Council's Response
		<ul style="list-style-type: none"> •Housing: Strategic Housing Market Assessment (SHMA) (December 2015) •Office: Employment Land Need and Availability (ELNA) Background Paper (October 2015) •Retail: Retail and Leisure Needs Assessment (RLNA) Update (April 2016)
LCR (Barry Gilbert)	<p>The housing target should be increased to “a minimum of 880 net additional dwellings a year based on the overall housing target of 8,796 net additional units ...” in order to align with the London Plan (March 2015) Policy 3.3 / Table 3.1 minimum borough annual average housing target (i.e. the London Plan target of 733 new homes per annum plus an additional 20% to account for under delivery in earlier years (recognised by the borough in paragraph 10.5.2 of the Issues and Options consultation), as required by the NPPF).</p> <p>In addition, if the Borough is able to augment this with extra housing capacity to close the gap between identified housing need and supply, it is required to do so in line with the NPPF and London Plan (Policy 3.3, paragraph D).</p> <p>We note the Council's view, stated in paragraph 10.5.1, that the London Plan target is above the objectively assessed need for housing identified by the Borough's SHMA of 575 new homes each year. However, there is clearly a London-wide housing market and there is a pressing need for new housing across the whole city; the borough should therefore seek to exceed the London Plan minimum target so as to improve access to housing for all Londoners. Furthermore, the London Plan EiP Inspector found that there is no need for each London Borough to duplicate the work done by the GLA and produce their own individual assessment of overall housing need (Mr A Thicket Report to the Mayor of London, 18 November 2014, paragraphs 22 and 23).</p>	<p>Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733. The 20% 'buffer' is explained in more detail in Chapter 35 'Diversity of Housing'.</p> <p>Policy CP1 Core Policy: Quanta of Development has been amended to state “seek to meet and exceed the London Plan target for new homes in the borough”.</p>
Greater London Authority Development (Stewart Murray)	<p>On the issue of the quanta of development the revised plan will have to reflect Kensington and Chelsea's minimum annual average housing supply target of 7,330 dwellings for the 2015-2025 as set out in London Plan 2015 policy 3.3. Further comments on housing policy are provided below. The borough will have to satisfy itself that it has up to date evidence to justify the other proposed quanta of development for office and comparison retail uses.</p>	<p>Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733.</p> <p>Objectively assessed need has been reviewed for all main uses within the following published documents:</p> <ul style="list-style-type: none"> •Housing: Strategic Housing Market Assessment (SHMA) (December 2015) •Office: Employment Land Need and Availability (ELNA) Background Paper (October 2015) •Retail: Retail and Leisure Needs Assessment (RLNA) Update (April 2016)

Question: Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Name	Comment	Council's Response
Onslow Neighbourhood Association (Eva Skinner)	<p>There is a well known shortage of dwellings, and it is right for RBKC to set a target. But for commercial retail and office it is wrong for the Council to try to influence this market. If retail is stronger than office space, it is not the Council's job to put restraints on one section of the market by rationing. Therefore I would remove items 2. and 3. from CP1 Quanta of Development.</p>	<p>The Council is required by the National Planning Policy Framework (NPPF) to plan to meet a range of objectively assessed needs.</p>
Turley (Ian Fergusson)	<p>Please see comments above. The Local Plan should strongly focus on the importance of achieving the London Plan housing target.</p>	<p>Policy CP1 Core Policy: Quanta of Development has been amended to increase the housing target from 585 to 733.</p>

Issue 4: Planning enforcement

Question 1: Are there any particular issues that a Local Enforcement Plan should address?

Name	Comment	Council's Response
Charles Bezoari Elder	<p>Littering. RBKC is filthy. When I travel to the USA, I am always astonished at the cleanliness of the streets of comparable cities ,towns, neighbourhoods. The USA is the biggest consumer of take- away food/beverages etc, and yet in NY/Boston/LA/SFO there is no litter, chewing gum; discarded containers of food/ beverage/ newspapers/ and the rest of the detritus that exists on a daily basis in RBKC. Littering laws exist- why are they not being enforced???? My front steps are used by passers-by to dump their detritus from local take away places on a daily basis, and the people in question are also to be found sitting on my front steps smearing them with ketchup and sugary drinks.</p> <p>Enforce the littering laws, and put up signs. The dog excrement is also a problem as generally foreign owners do not seem to understand that it is their duty to clean up, AND take away the plastic bags-not just leave the plastic bag full of excrement on the pavement. The recent ill considered tax on plastic bags has also had a negative effect on owners propensity to clean up.</p>	<p>These are not planning enforcement issues but relate to wider enforcement roles of the Council and other bodies.</p> <p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>
Onslow Neighbourhood Association (Eva Skinner)	<p>Yes, there should be a commitment by RBKC to enforce within a specified number of days (say 3), and to visit within a specified number of hours (say 2). Too often the Residents find that the RBKC visit is so slow and the enforcement is so long in coming that the offender has managed to continue the offence in order to conclude the work.</p>	<p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>
Norland Society (Clive Wilson)	<p>Issue 4: No current policy on enforcement There don't seem to be any objectives for putting this right. It should be beyond doubt that works carried out without planning permission, or inconsistent with permissions given, will be subject to enforcement. (There are current rumours that the Council's attitude towards a major development carried out without permission, and which would not comply with current policies, should be allowed retrospective permission, even though not policy-compliant.) We agree 100%: Local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so.</p>	<p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>
Roy Burns	<p>There is a urgent need to police planning decisions, by (for example) ensuring that the details of individual CTMP's are adhered to by the contractors. While this might entail an addition to the salary budget, enforcement would be cost-effective through the fining of delinquent contractors.</p>	<p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>
Jo Poole	<p>You should have a policy on planning enforcement and punitive fines for those who do not adhere exactly to the letter of any permission granted. Ensuring that developers are genuinely liable for transgressions and that penalties are set at a level which genuinely dis-incentivises illegal over-development.</p> <p>The onus needs to be taken away from planning and into the fiscal apparatus of the borough to tackle buy-to-leave investments in property.</p>	<p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>
Austin Mackie Associates Limited (Private Clients)	<p>The LPA should avoid any temptation to justify enforcement through planning policy as such. It should be made clear that enforcement should be proportionate to the issue concerned. In addition, the plan should not seek to encourage the use of planning enforcement in lieu of other legislative controls available to the Council or other authorities.</p>	<p>A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.</p>

Name	Comment	Council's Response
ESSA (Anthony Walker)	Issue 4 Planning Enforcement. We think it essential that a policy pays equal attention to both environment and planning.	A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.
Kensington Society (Michael Bach)	Issue 4: Planning Enforcement: The Society strongly supports the recent increase in enforcement	Noted.

Question: Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Name	Comment	Council's Response
Charles Bezoari Elder	Enforcement on Cycling that also breaks the law needs to be substantially upgraded. Cyclists merrily go through the red lights, ride on pavements, abuse slow walkers; ride at speed through the parks; chain their bicycles to private property which is not theirs and so on. Why is there no enforcement of the Highway code against cyclists?	<p>These are not planning enforcement issues but relate to wider enforcement roles of the Council and other bodies.</p> <p>The Council does not have powers to act against cyclists that commit traffic offences. Only the Police have the power to deal with moving traffic offences. The Council routinely removes bicycles that are abandoned and are obstructing the footway.</p>
Onslow Neighbourhood Association (Eva Skinner)	The Council should have a policy on planning enforcement for the benefit of construction companies and residents.	A new draft Policy C2 Planning Enforcement has been added to the Local Plan. A subsidiary Local Enforcement Plan will be published for consultation by the Council in due course to set out the detailed policies.