

# Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

## Section 6: Shops and centres

**Question 1:** Should the Council continue to take a town centre first approach to new shops and other town centre uses?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	
Charles Bezoari Elder	<p>We are inundated with "take-away" food emporia. Even supermarkets like Waitrose; shops like M+S; etc all have vast takeaway sandwich/beverage etc sections. Our streets are covered in the ensuing refuse that consumers discard with impunity.</p> <p>While the shops are not to blame per se, it is time to STOP allowing further shops that sell these items. It is imperative that an enforced fines for littering policy is applied. The Council makes over £100million in parking fines. Apply the same approach to littering fines.</p>		<p>Noted. A hot food takeaway is an A5 use, and planning permission will normally be required for a conventional shop to be used in this way. An application will consider the impact that an A5 use will have upon the retail character of a centre and upon the amenity of those living in the vicinity.</p> <p>The sale of sandwiches, however, is considered in planning terms to be an A1 use, or a shop. The planning system does not allow a LPA specify how an A1 shop operates, or what it sells.</p> <p>Littering is not a planning matter.</p>
Onslow Neighbourhood Association (Eva Skinner)		No	Noted. "Town centre first" is a central tenet of the Government's planning policy as articulated through the NPPF. This approach must be taken if the Local Plan is to be in conformity with Government guidance.
J Hernandez		Yes	Noted.
Norland Society (Clive Wilson)	<p>Shopping should be encouraged to develop in local neighbourhoods to enliven the local scene, provide employment and convenience.</p> <p>We are worried that Notting Hill Gate could be overrun by multiple food stores and other chains, threatening the loss of independents (like the wonderful Tylers)</p>		The planning system does not allow the LPA to control the nature of individual occupiers. However, maintaining a mix of unit sizes, as currently required by Local Plan Policy CF2, will help support diversity. Smaller units tend to be those needed by the smaller independent retailer.
Norland Society (Clive Wilson)		No	Noted. "Town centre first" is a central tenet of the Government's planning policy as articulated through the NPPF. This approach must be taken if the Local Plan is to be in conformity with Government guidance.
Sonia Richardson		Yes	Noted
J Neville		Don't Know	Noted
John Eagle		No	Noted. "Town centre first" is a central tenet of the Government's planning policy as articulated through the NPPF.
Victoria and Albert Museum (Steve Hyde)		Don't Know	
Victoria and Albert Museum (Steve Hyde)	<p>It is noted that V&amp;A is not located within the boundary of the South Kensington District Centre.</p> <p>The V&amp;A is however a destination for visiting members of the public not only to its exhibits but also to its ancillary retail facilities for the sale of merchandise related to temporary and permanent exhibitions held at the V&amp;A. The retail facilities are required to meet the operational needs of the V&amp;A.</p> <p>Planning policy therefore needs to recognise the unique position of retail provision</p>		<p>The Council recognises the role that retail and other A class uses can have in supporting the existing cultural uses in South Kensington. Such uses will normally be ancillary to the main cultural use, and as such will not require planning permission. Where the uses are no longer to be ancillary they should be subject to the sequential test and impact assessment required of other out of centre retail uses.</p> <p>A reference to the importance of ancillary A class to the cultural uses has been made to the supporting text for Policy CF7, Arts and Cultural uses.</p>

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	<p>within the strategic cultural quarter and support its provision for the enhancement of the cultural quarter.</p> <p>Therefore, policy CF1 needs to acknowledge that retail facilities are also acceptable in locations other than just town centres - for example, within the South Kensington Strategic Cultural Quarter where they are ancillary to the cultural institutions principal activities.</p>		
Exhibition Road Cultural Group (Emily Candler)	Ancillary retail facilities for the sale of merchandise related to temporary and permanent exhibitions and activities are essential to meet the operational needs of cultural institutions. Planning policy should recognise the unique position of retail within the strategic cultural area, and support its provision to enhance and protect the cultural offer. The policy should acknowledge that retail facilities are also acceptable in locations other than just town centres, for example where they are ancillary to the principal activities of cultural or educational institution.		<p>The Council recognises the importance that retail and other A class uses can have in supporting the existing cultural uses in South Kensington. However, such uses will normally be ancillary to the main cultural use, and as such will not require planning permission. Where the uses are no longer to be ancillary they should be subject to the sequential test and impact assessment required of other out of centre retail uses.</p> <p>A reference to the importance of ancillary A class uses has been made to the supporting text for Policy CF7, Arts and Cultural uses. The importance of "enabling development" exists in the current policy.</p>
Exhibition Road Cultural Group (Emily Candler)		Don't Know	
Jo Poole		Yes	Noted.
Sainsbury's Supermarkets Ltd (Indigo Planning)		Yes	Noted.
Turley (Ian Fergusson)	The town centre first approach makes sense in parts of England where other locations may be poorly served by public transport. Some parts of RBKC may be some distance from a town centre but have a high PTAL rating. There is a strong case for equally supporting town centre uses at such locations. Policy CF 5 currently refers to 'other accessible areas' and the same principle could be applied to town centre uses more generally.		"Town centre first" is a central tenet of the Government's planning policy as articulated through the NPPF. In addition the Council does support its existing centres as being the foci for growth. This approach has helped ensure the ongoing success of the Borough's centres over time. However, the Council's policies do not preclude the provision of new town centre uses outside of existing centres as long as it is demonstrated that harm is not being caused to the vitality of existing centres.
Turley (Ian Fergusson)		No	Noted.
Christie's South Kensington (Francesca Filippini Pinto)	<p>The Council should take whatever measures it can to promote the diversity and vibrancy of the High Streets in the Borough, so that they continue to serve the local community at the same time as attracting international visitors with their character and uniqueness.</p> <p>In particular, with regards to the Old Brompton Road, we see this street as having great untapped potential in extending the diverse, welcoming and vibrant experience now generated around South Kensington to a traditionally more residential area of the Borough. Residents and visitors alike would benefit from a more strategic approach to retail and catering occupancy, diversifying away from a current abundance of large-scale retailers, real estate agents and banks, moving towards a larger preponderance of high-quality, independent stores and food &amp; beverage outlets.</p> <p>We at Christie's South Kensington see ourselves as a crucial element of an enhanced cultural and social offering for the quarter.</p>		<p>Noted.</p> <p>The planning system does not allow the LPA to control the nature of individual occupiers. However, maintaining a mix of unit sizes, as currently required by Local Plan Policy CF2, will help support diversity. Smaller units tend to be those needed by the smaller independent retailer.</p> <p>The Council notes the role that an estate can have in shaping the retail offer of an area</p>
Christian Durie	What is a Town Centre first approach?		"Town centre first" is a central tenet of the Government's planning policy as articulated through the NPPF. The presumption is that new town centre uses should be located in existing centres. Only where there is no room in a centre should a use be permitted at the edge of the centre. The Council will ensure that this is explained in the final Local Plan.

Name	Comment	Selected Option	Council's Response
Kerry Davis-Head	Special care should be taken to try to second guess Government policy. For example the ability now for a sandwich shop to become a hot food takeaway without the need for planning permission or consultation by residents or adjacent businesses.		Noted. It is not always possible to second guess what the government's intentions are for planning. The Local Plan will have to reflect the policies, and the regulations, that are in existence at the time of the examination.
Austin Mackie Associates Limited (Private Clients)	But in doing so also seek to protect uses outside centres that serve the community, including local offices.		Noted. Offices are generally protected across the Borough, both within and outside existing centres. A range of other town centre uses, including out of centre A class uses are protected by Local Plan Policy CK1, with social and community uses protected by CK2. These policies are not subject to this review.
Austin Mackie Associates Limited (Private Clients)		Yes	Noted.
Royal Brompton & Harefield NHS Foundation Trust (RBHT)		Yes	Noted.
ESSA (Anthony Walker)	Yes the Council should continue to take a 'town centre first' approach to larger shops and those with a wider appeal and equally the provision of small local shops in small parades must be protected.		Noted.
ESSA (Anthony Walker)		Yes	Noted.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	CEL fully supports the Council's current approach to direct new shops and other town centre uses to town centres in the first instance. The High Street, and the quality of the retail offer in the High Street, is continually under threat from competing retail offers in out of centre locations. It is therefore essential for planning policies in RBKC to support the reinforcement and growth of existing town centres and maintain a strong vital and vibrant shopping offer with sufficient critical mass to maintain and increase its attractiveness to visitors and shoppers alike. The application of this approach through the Council's existing planning policy has been successful in maintaining the world class quality of the retail offer in the Borough which makes it unique.		Noted.
Kensington Society (Michael Bach)	<p>This section – shops and centres – is too focused on shops and should more explicitly deal with other main town centre uses, especially in higher-order town centres.</p> <p>is maintained. What policies should the Council adopt to ensure this is achieved?</p> <p>6.5.5ff: There will be a need to monitor change/leakage in order to know when to intervene when the degree of change/concentration of non-A1 uses becomes excessive (eg estate agents in Notting Hill Gate or cafes in South Kensington and on Brompton Road.</p> <p>Question 1 Should the Council continue to take a town centre first approach to new shops and other town centre uses?</p> <p>Yes, definitely – all town centre uses, including offices, avoiding large-scale offices in locations where the PTAL is less than 4.</p>		<p>This section intentionally concentrates on shops and other A class uses. Policy CF5 concerns office and other employment uses both within and outside of town centres.</p> <p>The need to assess the implications of government reforms is noted.</p> <p>Support for town centre first approach noted. This is central to the Local Plan. However, the Council does not wish to preclude the creation of larger office premises outside of town centres, (or designated Employment Zones) where they do not have a detrimental impact upon traffic. The Council recognises that town centres are appropriate foci for growth, but would be reluctant to oppose new office development, a valued use, where it not proposed within a centre. Such an approach will see a significant reduction in the creation of new office floorspace. This would be regrettable.</p>
Kensington Society (Michael Bach)		Yes	
Greater London Authority Development (Stewart Murray)	London Plan policies 2.15 and 4.7 - 4.9 set out the Mayor's approach to town centres and retailing. These set out the Mayor's strong support for a town centres first approach, the appropriateness of concentrating A1 uses in town centres, the importance of street markets and the promotion of small and affordable shops. As stated above, the borough will have to satisfy itself that it has robust evidence to support the quantum of retail floorspace it seeks to provide over the plan period.		<p>Noted.</p> <p>The Council has published an update to its RLNA to ensure that it has robust evidence to support the quantum of retail floorspace sought. This has regard to special forms of trading. The findings of the updated RLNA are reflected within the draft Local Plan, with little additional comparison retail need identified to 2023.</p>

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	<p>The quantum of retail floorspace anticipated should take a realistic account of changes in consumer behaviour including the impact of internet and multi-channel shopping as set out in London Plan policy 2.15.</p> <p>This year the Mayor will be undertaking an update of the 2013 Town Centre Health Check. The Town Centre Health check will provide further evidence to inform the borough's approach to town centres. The town centre health checks that will be coordinated by the Greater London Authority (GLA) will help inform any proposed re-designations. It is likely the health checks will cover:</p> <ol style="list-style-type: none"> <li>1. Scale and function (includes data on vacancy)</li> <li>2. Development trends and capacity</li> <li>3. Financial performance</li> <li>4. Accessibility and connectivity</li> <li>5. Town centre strategy and management</li> <li>6. Community safety</li> <li>7. Environment and heritage conservation</li> </ol> <p>Any proposed re-designations of retail centres should meet the function and criteria set out in Annex 2 of the London Plan.</p>		<p>The Council welcomes the updating of the 2013 Town Centre Health Checks.</p> <p>The planned re-designation of the Earls Court Road centre as a District Centre would bring the Borough's centres back in line with the hierarchy of centres as set out in Annex 2 of the London Plan.</p>
TfL (Lee Campbell)	<p>Shops and centres South Kensington Station includes a number of retail units. These businesses add to the vitality and character of the area and help meet the needs of both residents and visitors.</p> <p>Given the location and function of the station, the surrounding retail units provide a wide range of services, including food outlets, restaurants and local services. It is important that planning policy continues to support retail development, but that it is sufficiently flexible to allow commercial developments to adapt to local need and market changes. TfL sets out its comments below for relevant questions raised in the draft plan.</p> <p>TfL supports the principle of maintaining and enhancing shopping in designated town centres. This is a sustainable approach that will preserve the vitality and viability of retail units across the Borough. Shopping is an important feature of key designations in the Borough, such as South Kensington, and should be supported. TfL considers that planning policy should retain a town centre first approach to new shops and town centre uses.</p>		<p>Support for town centre first approach to new town centre uses noted. Whilst the update to the RLNA concludes that there is limited need for additional comparison retail floorspace to 2023, new floorspace is not precluded when an applicant can demonstrate that it will not have an impact upon neighbouring centres. Any new retail development will continue to be directed to existing centres, or failing that, the edge of existing centres.</p>
Earl's Court Partnership Ltd (ECPL)	<p>Para 6.2.3: Note the requirement for 26,150 sq m only goes up to 2015. The evidence base is out of date and updated forecasts are needed covering the plan period.</p> <p>Para 6.2.4: Reference to 'potential' edge of centre sites. The Plan needs to allocate a range of sites to meet needs in full. It has failed to deliver to date reflecting limited sites and stronger residential values. The plan should encourage the provision of new retail at ground floor.</p> <p>Policy CF1: There is no rationale for focussing retail towards 'higher order' centres - it should be met where there are sites available. In any event, Earl's Court should be added to the list given its proposed re-designation to District Centre status.</p> <p>Para 6.4.6 Records that the Local Plan has failed to bring forward any net increase in retail floorspace. C/W the defined need by 2015, the borough has seen a net loss of 3,355 sq m. The new Local Plan should actively promote new retail where suitable opportunities are available, including Earl's Court.</p>		<p>The Council has published an update to the Retail and Leisure Needs Assessment. This concludes that to 2023 there is only a limited need for additional comparison floorspace. As such there is no need to "allocate" new sites to accommodate a now limited need.</p> <p>The plan will encourage the provision of new retail floorspace where it accords with the principles set out within the NPPF.</p> <p>The Council recognises that new retail floorspace should be directed to new town centres – and not simply to larger centres. CF1 has been amended to reflect this. However, the Council also notes that the scale and nature of development within a town centre must reflect the size, the role and the function of the centre. CF2 has been amended to make this explicit.</p> <p>The Council notes that there has been a mismatch between provision of A class floorspace and the predicted need. The Council notes that the update to the RLNA does significantly reduce the predicted need over the next five years. However, the Council will always consider proposals for new retail floorspace on their own merits, having regard to</p>

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	<p>Para 6.4.9 Notes the London Plan review figure identifies a need for 32,120 sq m net additional retail by 2026. The plan needs to allocate a range of sites to meet needs in full.</p> <p>Para 6.4.10 Support the need for a new retail study, to identify needs arising over the plan period. The Council needs to allocate sufficient sites to meet needs in full, and recognise the potential of Earl's Court to contribute to meeting needs.</p> <p>Issue 1 Support the town centre first principle, but the Local Plan needs to recognise that there are very few opportunities within defined town centres. There is no need for a lower threshold for retail impact, as centres in RBKC are not vulnerable. There is no case for planning to seek to control mix/unit sizes-this is best left to the market. Policies encouraging affordable retail are not preferred. Given the Borough has seen a net loss, as retail values are lower than residential, imposing an affordable retail policy would further reduce viability and inhibit delivery.</p>		<p>the requirements of the Local Plan, the London Plan and of the NPPG. In this consideration, the Council will have regard to the need to try to exceed its challenging housing targets.</p> <p>The Council considers that a 400 sq m threshold triggering the need for an impact assessment, rather than the 2,500 "default NPPF" threshold is appropriate as reflects the tightly knit nature of centres within the borough. The supporting text to CF1 has been amended to reflect this and that the nature of the assessment should be proportionate to the scale of development proposed.</p> <p>The Council supports the view that an affordable shop policy is not appropriate, and CF3 has been amended accordingly. However, requiring a mix of unit sizes for new large scale retail development is considered appropriate as it can help main the diversity of shop types so valued by many of those living and visiting the Borough.</p>
Cllr E Dent Coad	Always start with evidenced local need, for residents, businesses and visitors, in that priority order.		Noted. In many cases retail need for residents, for businesses and for visitors will correspond.

**Question 2:** Should the Council continue to set its own size threshold for proposals which require an impact assessment?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted
Charles Bezoari Elder	The Council's behaviour is too uneven, subject to change, and unpredictable. We need less interference from unelected bureaucracy.		The Council does not recognise this.
Onslow Neighbourhood Association (Eva Skinner)		No	Noted
J Hernandez		Don't Know	Noted
Sonia Richardson		Yes	Noted
J Neville		Don't Know	Noted
Roy Burns		Yes	Noted
Victoria and Albert Museum (Steve Hyde)	No additional comment.		Noted
Victoria and Albert Museum (Steve Hyde)		Don't Know	Noted
Jo Poole		Yes	Noted
Sainsbury's Supermarkets Ltd (Indigo Planning)		No	Noted

Name	Comment	Selected Option	Council's Response
Sainsbury's Supermarkets Ltd (Indigo Planning)	Issue 1, Question 2 (Impact Assessment Thresholds)  Our view is that the Council should not continue to set its own size threshold for proposals which require an impact assessment. The threshold should be set to NPPF default of 2,500 sq m. However in the case of the Kensal Gasworks site, a retail impact and sequential assessment should not be required for the relocated Sainsbury's or the new retail floorspace as it will be within the proposed new centre and any impact will be offset in part by the closure of the existing store.		A threshold of 400 sqm was introduced in 2010 and has proved effective in ensuring that the impact on new retail development on existing centres is properly assessed. Given the nature of the Borough and the fine grained network of centres the "default" threshold of 2,500 sq m is not considered to be appropriate. The Council is concerned that this could allow significant retail developments to take place, "untested", and to harm the vitality of existing centres. The supporting text to CF1 has been amended to make it explicit that the Council will only require an impact assessment when there is a net increase of retail floorspace of more than 400 sq m.
Turley (Ian Fergusson)	Again, a more nuanced approach should be taken by the Council RBKC than may be suitable in other parts of England. In much of RBKC town centre larger uses are wholly suitable, as Policy CF 5 recognises with its differentiated approach for 'large' offices at 'other accessible areas'.		A threshold for assessment of 400 sq m rather than 2,500 allows the nuanced approach. It requires assessment, and does not, and should not, be taken to mean any proposal creating more than 400 sq m of floorspace is contrary to policy.
Turley (Ian Fergusson)		Yes	Noted
Kerry Davis-Head		Yes	Noted
Austin Mackie Associates Limited (Private Clients)		Don't Know	Noted
Royal Brompton & Harefield NHS Foundation Trust (RBHT)		No	Noted
ESSA (Anthony Walker)		Yes	Noted
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	CEL supports the Council's current floorspace threshold of 400 sq.m (GEA). The scale and geographical location of town centres in RBKC means that the majority of residential areas in the Borough are within easy walking distance to identified retail facilities. As a result, any new retail development of 400 sq.m or greater located in an out of centre location should be carefully considered, both in the context of the sequential approach and also the extent of impact they may have on identified retail centres. It is therefore considered appropriate to maintain the current 400 sq.m threshold.		Noted. The 400 sq m threshold reflects the character of the borough, and the web of centres across it.
Kensington Society (Michael Bach)	Yes – thresholds need to be matched to the size/status of centre and the catchment it serves. The 400sqm threshold relates to the size of a Sainsbury Local and the "local" formats of other food retailers. Such stores, however, would be too big for a neighbourhood centre, where one or two shopfronts worth (ie less than 200sqm) would be the maximum size of unit likely to be required. NB: the demand for larger units than 200sqm will usually be in district centres and which is why Earl's Court Road should be re-classified as a district centre.		Support for 400 sq m threshold noted. However, the Council does not concur with the view that units with a floor area greater than 200 sqm will necessarily be too large for a neighbourhood centre. The Council is, however, of the view that the scale of retail development within a centre should reflect the size, role and function of that centre. This has been made more explicit through an amendment to existing Local Plan Policy CF2. The Council proposes the re-classification of Earl's Court Road as a District Centre. This reflects the size and character of the centre rather than a demand for larger units within it.
Kensington Society (Michael Bach)		Yes	
Cllr E Dent Coad		Yes	

**Question 3:** Should the Council continue to influence the nature of new shop units being provided within a centre?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder	Other than a clampdown on shops selling takeaway food and drink. Is it the role of the Council to define a vision of what new shop units being provided		Noted. The Council seeks to achieve a balance of uses within the Borough's town centres. This will include both a concentration of shops in the primary shopping areas,

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	within a centre should be? And to impose this vision on the people? Let any/all shops flourish. If people do not like them, they will not go to them, and those shops will close and be replaced by something more successful. It is called freedom of choice. The council should stop trying to impose its own narrow choices on the residents, and let the market decide.		and a greater diversity of uses – including A5 uses – in the secondary areas. It would not be appropriate to preclude all A5 uses without having regard to the impact that they have upon the character of the area and upon the amenity of those in the vicinity.
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		No	Noted.
J Hernandez	I fear otherwise that we will end up with too many 'estate agents' and not enough useful local shops, cafes and other independent offerings which we need to make the borough a nice place to live		The Council notes that recent liberalisation to the planning regulations means that planning permission is no longer required for a shop to change to an estate agent. In addition the planning system does not allow a LPA to control the nature of the shop, its ownership or whether it is part of a chain. As such the Council considers that that the most appropriate method of trying to maintain some diversity is to try to maintain a diversity of unit types. This will only be relevant for newly created floorspace, as ordinarily reconfiguration of existing floorspace is not development which requires planning permission.
J Hernandez		Yes	Noted.
Norland Society (Clive Wilson)	But how? Need to encourage small independents - lower business rates?		The Council recognises that it has few tools to try to support a range of shop types. In addition, levels of business rates is not a matter than can form part of a Local Plan.
Norland Society (Clive Wilson)		Yes	Noted.
Sonia Richardson		Yes	Noted.
J Neville		Yes	Noted.
Roy Burns		Yes	Noted.
John Eagle		No	Noted.
Victoria and Albert Museum (Steve Hyde)	No additional comment.		Noted.
Victoria and Albert Museum (Steve Hyde)		Don't Know	Noted.
Jo Poole		Yes	Noted. The planning system does not allow a LPA to control the nature of the shop, its ownership or whether it is part of a chain. As such the Council considers that that the most appropriate method of trying to maintain some diversity is to try to maintain a diversity of unit types. This will only be relevant for newly created floorspace, as ordinarily reconfiguration of existing floorspace is not development which requires planning permission.
Jo Poole	These must include independent and affordable shops.		Noted.
Sainsbury's Supermarkets Ltd (Indigo Planning)		No	Noted.
Sainsbury's Supermarkets Ltd (Indigo Planning)	Our view is that the Council should not unduly influence the nature of new shop units and should stop resisting amalgamation as retailers need to respond to ever changing consumer needs and shopping patterns.		Noted. Controlling units' size is one of the few tools that the Council has in helping maintain diversity of unit types. This diversity is valued by many of those living within and visiting the Borough. The Council recognises that amalgamation cannot ordinarily be controlled, as does not normally constitute development which requires planning permission.
Turley (Ian Fergusson)	The Council should set out general aspirations for retail mix but equally be mindful of the limitations in its powers imposed by the Use Classes Order and General		Noted. The Council recognises that it has few tools to try to support a range of shop types. The most effective mechanism to support diversity may be to require a range of

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	<p>Permitted Development Order. There is a danger that the Council could impose restrictions on new applications which are not borne by existing premises. An example might be an expectation for new development to accommodate a particular type of vendor.</p> <p>Such an approach would make it much less likely that new applications would come forward that would refresh the retail offer across the Borough. A consequence might be a tired retail environment and a deteriorating retail offer across the Borough, resulting in a loss of trade to competing parts of London.</p>		<p>unit sizes. The Council recognises that it does not have the powers to specify the type of shop for a particular unit.</p> <p>The Council does recognise that there may be no mechanism to control amalgamation, and as such, unit size for existing shops. It does however, have the power to do so for newly built developments. This may be appropriate – as it helps maintain the character of the Borough's centres. The Council considers it unlikely that such an approach will stop new retail development coming forward. It takes a pragmatic approach and will consider the overall viability of a retail scheme when determining any application. This is not to say that it is inappropriate to include a policy which sets out the Council's ambitions for a diverse retail unit offer.</p>
Turley (Ian Fergusson)		Yes	Noted.
Christie's South Kensington (Francesca Filippini Pinto)	YES – please refer to our answer to Question 1 above.		Noted. The Council recognises that property owners, and their aspirations, can play an important role on shaping the character, and the vitality of a town centre.
Christian Durie		Yes	Noted.
Christian Durie	<p>As long as it is towards small USEFUL retail outlets. Ones that are of use to the community.</p> <p>Maintain diversity - encourage small retailers.</p> <p>Don't allow large floor space developments. We lost a row of very useful small Community shops, 'corner shop' and restaurants to three vast retail areas... I doubt some of them will last long as there is never anyone in them</p>		Noted. The Council recognises that it has few tools to try to support a range of shop types. The most effective mechanism to support diversity may be to require a range of unit sizes. The Council recognises that it does not have the powers to specify the type of shop for a particular unit.
Kerry Davis-Head		Yes	Noted.
Austin Mackie Associates Limited (Private Clients)	... but restrictions should only be sought where there is any realistic evidence that there is a demand from local operators		Noted. The Council is satisfied that there will be demand for a range of unit sizes across the Borough and within a centre. Smaller units will ordinarily command lower rent and may be more suited to the smaller independent retailer. The Council would consider any evidence provided as part of a specific application were this to suggest that the units being provided might stand empty.
Austin Mackie Associates Limited (Private Clients)		Yes	Noted.
Silchester Residents Association (Jo Poole)	Shops should be relevant to the community, not just a 'Notting Hill' address for businesses to exploit. Please see q.4.		Noted. The Council recognises that it has few tools to try to support a range of shop types. The most effective mechanism to support diversity may be to require a range of unit sizes. The Council recognises that it does not have the powers to specify the type of shop for a particular unit.
ESSA (Anthony Walker)		Yes	Noted.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	CEL would continue to support the Council's current approach to influencing the nature of shop units being provided within a centre. The Estate has found the Council's current approach to be a pragmatic consideration based upon acknowledging the requirement of modern retailers; the need for a range of unit sizes within a retail centre and, importantly, ensuring that the scale of retail units being proposed does not undermine the vitality and viability of the town centre. This continued pragmatic approach by the Council would be supported by CEL.		Noted. The Council has always taken, and will continue to take a pragmatic approach to influencing the nature of new shop uses. The existing policies within the Local Plan allow the Council to do so.
Kensington Society (Michael Bach)	<p>Question 3</p> <p>Should the Council continue to influence the nature of new shop units being provided within a centre?</p> <p>Yes - see answer to Question 2 above</p>		Noted.
Kensington Society (Michael Bach)		Yes	Noted.
Bilfinger GVA (Thomas Edmunds)	With regards to Issue 1 Question 3 "should the council continue to influence the nature of new shop units being provided within a centre?", whilst the mix of shops		Noted. The Council recognises that it has few tools to try to support a range of shop types. The most effective mechanism to support diversity may be to require a range of

Name	Comment	Selected Option	Council's Response
	cannot be explicitly controlled through planning, the Council should encourage proposals that will support the retention of – and provision of – local and independent shops by providing appropriately sized retail units and a public realm that is inviting and will encourage residents to stop and spend time locally rather than pass through to alternative locations. This policy ambition can be delivered through a flexible approach to decision-making.		unit sizes. The Council recognises that it does not have the powers to specify the type of shop for a particular unit.
TfL (Lee Campbell)	<p>Shops Issue 1, Question 3 Should the Council continue to influence the nature of new shop units being provided within a centre?</p> <p>Shops Issue 1, Question 4 Should the Council continue to seek the provision of affordable shops in new large scale retail developments?</p> <p>Response to Questions 3 and 4: TfL notes that adopted Policy CF2 (which seeks the provision of affordable shop units) has been ineffective. TfL considers that the priority for the Borough should be to ensure the delivery of new high quality retail development and supports the suggestion of deleting this policy.</p> <p>TfL considers that a policy requiring a range of unit sizes is a far more effective and sustainable approach to supporting new businesses in the Borough. Ensuring that new retail development includes a small proportion (e.g. 5-10%) of smaller units (less than 80sqm) will allow start-up and independent businesses to occupy prominent locations in the Borough. This will ensure that the unique character of key shopping destinations is preserved and enhanced. It will however be important that any policy is sufficiently flexible to ensure that the overall type and quantum of retail development is not undermined and that the retail space delivered responds to local need.</p> <p>This approach is considered a more appropriate and deliverable policy than using rent control to support new and local businesses.</p>		Support for provision of a range of unit sizes is noted. Seeking a diversity of unit sizes is seen as the most effective tool in providing the premises sought by a range of occupiers. The Council recognises that the existing policy which sought to provide affordable shop units has proved ineffective. Policy CF2 has been amended accordingly.
Cllr E Dent Coad	Yes. There are already too many large units in new developments that are empty (eg, Canalot's student housing, The Grove). Smaller more affordable units must be available.		Noted. The Council recognises that it has few tools to try to support a range of shop types. The most effective mechanism to support diversity may be to require a range of unit sizes. The nature of the units being provided should reflect the location. So, for example, the Council would ordinarily expect smaller units to be provided in smaller centres or outside of designated centres.

**Question 4:** Should the Council continue to seek the provision of affordable shops in new large scale retail developments?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	
Charles Bezoari Elder	That magic word "affordable" once more- it means different things to different people. This is micro-management by the Council. Let shops flourish and die as consumer tastes evolve. Stop trying to impose a vision of what a shopping experience should be. Consumers will decide for themselves anyway by avoiding shops they do not want.		Noted. Whilst the market does have a central role in shaping the character of the Borough's town centres, stakeholders have long valued retail diversity. The intention of the Local Plan is to try to maintain this diversity. With regard the methodology, the Council does, however, recognise that the existing policy which sought the provision of affordable shops in new larger retail developments proved ineffective. CF2 has been amended accordingly.
Onslow Neighbourhood Association (Eva Skinner)		No	Noted.

Name	Comment	Selected Option	Council's Response
J Hernandez		Don't Know	Noted.
Norland Society (Clive Wilson)		Yes	Noted.
Sonia Richardson		Yes	Noted.
J Neville		Yes	Noted.
TfL (Lee Campbell)	<p>Response to Questions 3 and 4: TfL notes that adopted Policy CF2 (which seeks the provision of affordable shop units) has been ineffective. TfL considers that the priority for the Borough should be to ensure the delivery of new high quality retail development and supports the suggestion of deleting this policy.</p> <p>TfL considers that a policy requiring a range of unit sizes is a far more effective and sustainable approach to supporting new businesses in the Borough. Ensuring that new retail development includes a small proportion (e.g. 5-10%) of smaller units (less than 80sqm) will allow start-up and independent businesses to occupy prominent locations in the Borough. This will ensure that the unique character of key shopping destinations is preserved and enhanced. It will however be important that any policy is sufficiently flexible to ensure that the overall type and quantum of retail development is not undermined and that the retail space delivered responds to local need.</p> <p>This approach is considered a more appropriate and deliverable policy than using rent control to support new and local businesses.</p>	Yes	<p>Support for provision of a range of unit sizes is noted. Seeking a diversity of unit sizes is seen as the most effective tool in providing the premises sought by a range of occupiers.</p> <p>The Council recognises that the former policy which sought to provide affordable shops has proved ineffective. Policy CF2 has been amended accordingly.</p>
John Eagle		Yes	Noted.
Victoria and Albert Museum (Steve Hyde)		Don't Know	Noted.
Victoria and Albert Museum (Steve Hyde)	No additional comment		Noted.
Jo Poole		Yes	Noted.
Turley (Ian Fergusson)	Please see comments above		Noted.
Turley (Ian Fergusson)		No	Noted.
Christian Durie		Yes	Noted.
Christian Durie	Rather you did not encourage large retail developments, they do not enhance a community area.		<p>The Local Plan takes the view that the scale of new retail development should reflect the character of the centre in which it is proposed, its function and its position within the town centre hierarchy. Any new large scale retail development will have to be assessed against the policies within the Local Plan, London Plan and against the policies within the NPPF.</p> <p>As such the Council is of the view that new large scale retail developments may be appropriate in some areas but not in others.</p>
Kerry Davis-Head		Yes	Noted.
Kerry Davis-Head	Communities need useful shops. The developer at LRPS has stated that only Bond Street style shops will be allowed within the development. That even a Waitrose or M&S food shop is too down market. betting shops or shops of that nature, fast food takeaways should be discouraged. Thus is due to the impact on the local environment.		<p>The planning system does now allow LPAs to specify the nature of particular retailers. We attempt to maintain diversity by requiring a range of unit sizes within suitable new development. It is for property owners to decide who occupies an individual property. The planning system does allow LPAs to control betting shops or A5 takeaways. The Council intends to do so using the criteria in CF3.</p>

Name	Comment	Selected Option	Council's Response
Royal Brompton & Harefield NHS Foundation Trust (RBHT)	Viability of development should inform the capacity of individual developments to provide affordable shops within new large scale retail development. Other planning priorities may be regarded as of greater importance in decision making on a case by case basis.		Noted. The Council recognises that the existing policy which sought to provide affordable shop has proved ineffective. Policy CF2 has been amended accordingly.
Silchester Residents Association (Jo Poole)	Yes		Noted.
ESSA (Anthony Walker)		No	Noted.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	<p>As part of the preparation of the original Core Strategy, CEL objected to proposals seeking the provision of affordable shops within new large scale retail developments. CEL take a flexible approach to the assignment of leases to retail occupiers on a case by case basis taking into account the quality of the retailer; the need to ensure a varied retail offer and also the need to maintain occupancy at the highest level in order to create an appropriate level of vitality and vibrancy throughout the principal shopping parades within the Estate. Therefore, in some circumstances, the Estate offers a lower level of rent where it is considered a particular retail tenant will make a significant contribution to the retail offer overall.</p> <p>The critical difference between the approach the Estate takes on the matter and the approach of the Council's policy, is that the Estates' strategy is based on identifying the right retailer that might be appropriately encouraged to occupy a retail unit through a lower level of rent, rather than simply identifying retail units that should provide discounted rents in perpetuity. If the policy objective was to attract smaller independent retailers who might not otherwise be able to compete with the larger national and multiple retailers, the strategy is flawed. Unlike the principle of affordable housing where there is clear criteria for occupation, it is impossible for the current policy approach to control the occupation of the discounted units.</p> <p>Importantly, the Borough has very few opportunities for new large scale retail development to be achieved and yet there is an overwhelming need for new retail accommodation to be brought forward in the Borough in order to maintain its world class retail offer. A requirement to provide an element of affordable retail units as part of a larger retail scheme would have a substantial impact on viability and may in fact discourage many landowners and developers from considering such projects, which may already be marginal. It is in this context, that CEL would support the removal of this element of the policy as part of any changes going forward.</p>		The Council notes the concerns of the consultee. The Council recognises that the existing policy which sought to provide affordable shops has proved ineffective and Policy CF2 has been amended accordingly. A range of unit types will be sought, but the provision for affordable shops has been removed.
Kensington Society (Michael Bach)	<p>Question 4 Should the Council continue to seek the provision of affordable shops in new large scale retail developments? Yes – but there may be few opportunities where the total floorspace will be sufficient to do this. An example would be the redevelopment of Sainsbury's in Ladbroke Grove or the expansion of Tesco in West Cromwell Road where complementary smaller shops should be included in the scheme. This suggests that a scheme of over 2,000sqm might need to include a diversity of sizes.</p>		Noted. The Council does, however, note that the existing policy which sought to provide affordable shop has proved ineffective and Policy CF2 has been amended accordingly. A range of unit types will be sought, but the provision for affordable shops has been removed.
Kensington Society (Michael Bach)		Yes	Noted.
Judith Blakeman	We do not object to this proposal in principle, but this should develop over time and organically and the shops should offer what is needed within the immediate neighbourhood, bearing in mind that Westfield is one stop away from Latimer Road. The promised small retail units beneath the railway arches at the Peabody More West development have not yet materialised and nor has the retail unit at More West been let. We do not wish to see retail units left empty due to lack of local		Noted. The Council concurs with the view that long term vacant retail units have limited value.

Name	Comment	Selected Option	Council's Response
	demand.  A Neighbourhood Centre would bring greater vibrancy to the area, but thought should be also given to the need for a purpose built health and well-being centre if the Council is serious about its wish to improve the health of Latimer residents.		
Cllr E Dent Coad		Yes	Noted.

**Question 5:** Should the Council continue to use percentage based frontage policies to ensure that a mix of uses exists within centres, amending them to reflect the greater freedom offered by the GPDO?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder	The Council should stop micro-managing these issues. Why are there any percentage based frontage policies? These are all impediments to growth and evolution.		Noted. The Council does, however, intend to try to maintain the diversity and the vitality of its centres. Central to this ambition is the need to maintain a concentration of shop uses within the centres. A percentage based frontage policy is seen as the most appropriate tool to achieve this. This is not seen as an impediment to growth but as a tool to stop the extremes of the market. Unchecked the market may not consider the long term future of centres.
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		Yes	Noted.
Bilfinger GVA (Thomas Edmunds)	Issue 1 Question 5 asks "should the council continue to use percentage-based frontage policies to ensure that a greater mix of uses exists within centres, amending them to reflect the greater freedom offered by the GDPO?" As above, a flexible – rather than prescriptive – approach would allow for development proposals to, where appropriate, offer a better variety and range of retail units within a defined frontage. An assessment on the nature of the provision – which could involve a quantitative and qualitative improvement, or catering to a specific need – should also be taken into account when considering the acceptability of development proposals, as opposed to simply adhering to inflexible criteria that do not reflect individual site circumstances or individual development proposals. A flexible approach should take into account the overall benefits a scheme is delivering in addition to site specific considerations of a scheme, such as dual aspect units or a net increase in the number of retail units.		The Council is trying to provide a degree of certainty for those considering changing the use of a property within a town centre. A flexible case by case approach suggested by the consultee will not achieve this aim. In addition the Council is concerned that a flexible approach would result in the gradual degradation of the retail function of the Borough's town centres. Maintaining a high concentration of shops in primary retail areas is considered essential if the retail strength of such centres is to be retained. The Council will always have regard to the individual characteristics of a site when determining an application., with the overall benefits of a larger scheme being carefully considered.
Sonia Richardson		Yes	Noted.
J Neville		Don't Know	Noted.
Roy Burns	But see below re the unique character of South Kensington		Noted.
Roy Burns		Yes	Noted.
John Eagle		No	Noted.
Victoria and Albert Museum (Steve Hyde)	No additional comment.		Noted.

Name	Comment	Selected Option	Council's Response
Victoria and Albert Museum (Steve Hyde)		Don't Know	Noted.
Jo Poole		Yes	Noted.
Turley (Ian Fergusson)	<p>What perhaps contributes most to the vibrancy of a town centre is active frontages and the depth of visible floorspace beyond (e.g. Zone A). Less important is the actual amount of floorspace, in particular when this is peripheral and/or ancillary.</p> <p>A percentage approach can be a useful mechanism for ensuring a town centre has an appealing feel. The actual percentage however requires careful consideration. The current approach of course has a number of unintended consequences, for example encouraging Class A1 cafes rather than Class A3 restaurants and making the exercising of permitted development rights a very appealing proposition to landlords struggling to let units either to desirable tenants or to let them at all.</p>		When considering applications for new retail developments the Council will have regard to the nature and the depth of units as well as the percentage of A1 frontages. However, the Council does consider that maintaining a strong concentration of shop uses in the primary retail frontages is the correct approach, and a percent based policy is an effective way of achieving this. It is an approach supported by the guidance within the NPPF. The Council does note that the percentage based frontage tool can have unintended consequences. The Council can, however, only work inside the current planning regulations. An A1 café may not need approval when an A3 restaurant may do so.
Turley (Ian Fergusson)		Yes	Noted.
Christian Durie		Don't Know	Noted.
Kerry Davis-Head		No	Noted.
Kerry Davis-Head	It is not always appropriate. Some streets are known as design quarters. The inclusion of a mix would negate this. But the council should ensure that shops do not open that would threaten the livelihood of existing shops, i.e. a larger cafe opening and taking the trade of a smaller more community led cafe		The planning system does not allow the LPA to favour one café operator over another.
Austin Mackie Associates Limited (Private Clients)	...only where there is evidence of a demand from defined 'shop' uses. Elsewhere the policy should allow for flexibility to allow centres to adapt. Exceptions to the traditional definition of a 'shop' use should be considered where the use would contribute to local needs and the overall character and function of a centre.		The Local Plan policies try to maintain a high percentage of shops within the core areas, but support greater flexibility in the peripheral areas. This is supported by the guidance within the NPPF. This approach is considered to offer an appropriate level of flexibility. It does not preclude non-shop uses within centres. In assessing any application the Council will have regard to the specific circumstances of the case, including for example whether the existing A1 unit has proved unlettable in the longer term.
Austin Mackie Associates Limited (Private Clients)		Yes	Noted.
Ilchester Estates (Todd Buchanan)		No	Noted.
Ilchester Estates (Todd Buchanan)	<p>The Estate has conducted extensive research into improving the vitality of the retail offering in its control between 240-296, Kensington High Street and has committed to a long-term strategy to create a best in class neighbourhood parade offering amenities to the immediate local residents such as butchers, bakers, delis, cafes and restaurants. This area of Kensington High Street will be known as Holland Quarter. Kensington High Street is very long, having to cater for office workers, city wide shoppers and also local residents. From the estates research it is clear the retail west of Holland Park is for local residents but is not currently fit for purpose.</p> <p>The very basis of the amendments to the GDPO (2015) were in order to ensure that (where retail is concerned) the high street does not continue to suffer from overly prescriptive policies which do not necessarily reflect market trends. Council policy should be consistent with the GDPO ensuring that there is clear continuity between national policy and local plan policy.</p> <p>Melbury Court is a prime example of this, whereby the existing mix comprises 17 retail units comprising 53% (retail), 18% A3 (restaurant), 23% D1 (non-residential</p>		<p>There would be no inherent conflict between maintaining a percentage based policy and the amendments to the GPDO. Designation of primary and secondary frontages, with associated policies specifying the proportion of shop uses in each, is supported by the NPPF.</p> <p>This approach is not considered to be overly prescriptive, as it allows some flexibility, particularly in secondary frontages. It seeks to support a range of town centre uses, whilst maintaining the critical mass of shops.</p> <p>This approach has provided for a successful balance of control and flexibility and has ensured that the retail offer within the Borough's town centres is varied and high quality.</p>

Name	Comment	Selected Option	Council's Response
	institutions) and 6% Sui Generis. The Council's current requirement that 66% of retail units in secondary locations (88% in prime) should be for A1 retail is not a practical approach to ensuring the long term survival of a high street. A1 uses will not necessarily command greater footfall than an A3 use and increased footfall is what is required in order to improve the high street.		
ESSA (Anthony Walker)		Yes	Noted.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	CEL supports the Council's current policy approach which prioritises A1 Use Classes within the shopping frontages but allows an element of flexibility in respect of other town centre uses. The current approach has provided for a successful balance of control and flexibility and has ensured that the retail offer within the identified town centres is varied and high quality. CEL would support the continued approach to this policy.		Noted.
Kensington Society (Michael Bach)		Yes	Noted.
Kensington Society (Michael Bach)	Yes – definitely, to prevent the rapid expansion/concentration/takeover of key shopping frontages by cafes and restaurants in major centres (eg Brompton Road and round South Kensington/Exhibition Road) or by estate agents (eg Notting Hill Gate, Kensington Church Street, Harrington Road and even neighbourhood centres (eg Gloucester Road North))		Noted. The Council does, however, recognise that recent liberalisations to the planning regulations have removed some of the controls that it once had. Permission is no longer required for change of use of A1 uses to A2 estate agents, whilst a system of prior approval does allow for temporary changes of use of shops to cafes and restaurants.
TfL (Lee Campbell)	<p>TfL notes that adopted Policy CF3 states that 80% of units within primary shopping frontages of the higher order centres should remain in shop uses. The requirement drops to 66% for secondary frontages. TfL supports the principle of this policy, which will preserve the character and function of key destinations in the Borough. Careful consideration is however required regarding the identification of shopping frontages.</p> <p>A degree of flexibility is required within the policy to ensure that local character and viability is fully considered. The policy should not result in any units being left vacant, as this would detract from the shopping frontage and wider area. TfL requests that sufficient criteria are added to the policy to allow consideration of exceptions to the policy. This should include a consideration of marketing (e.g 6 months of active marketing evidence), the condition of the unit and refurbishment costs and the public benefit of the proposed alternative use.</p> <p>TfL also requests clarification on the extent of designated retail frontages at South Kensington. TfL notes that Chapter 42 of the Local Plan (2015) identifies the commercial units on Thurloe Street as a secondary retail frontage. This designation has not been taken forward in Figure 6.6 of the draft plan. TfL supports the removal of these properties from the designation as they predominantly serve a different function and purpose than the units in the station arcade (which continues to be designated as a retail frontage).</p>		<p>TFL's interest in the Borough's shopping policies is noted.</p> <p>The Council always interprets the policies in a measured manner when assessing an individual application. Matters such as length of vacancy, condition of the property etc will often be material when assessing an application. The Council will consider whether it would be appropriate to "regularise" these other material considerations within the amended policy.</p> <p>The Council had not intended to remove any frontages from the South Kensington centre. The omission of the Thurloe Street frontage was a drafting error. Fig 6.6 was intended to indicate a possible relaxation of the frontage policy, rather than a change to the boundaries of the centre itself.</p>
Cllr E Dent Coad	We need a mix of uses but realistically only large chains can afford the larger ones, to keep our independent shops there must be a majority of small units available at an affordable rate.		The planning system does now allow LPAs to specify the nature of particular retailers. We attempt to maintain diversity of uses through the percentage policy and the diversity of occupiers through requiring a range of unit sizes within suitable new development. It is always for property owners to decide who occupies an individual property.

**Question 6:** Should the Council relax its percentage based policies in parts of the South Kensington District Centre to reflect its role in serving those visiting Exhibition Road and the Museums?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder	The Council needs to re-focus on serving the needs of residents- that is your primary purpose. You are elected by us, not by the visitors. Too many council policies are geared to visitors, and non-residents in general.		Noted.
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		No	Noted.
Sonia Richardson		Yes	Noted.
J Neville		Don't Know	Noted.
Roy Burns		Yes	Noted.
Roy Burns	The demands of south Kensington are largely defined by the enormous tourist numbers attending the museums/RAH/etc. Old Brompton Road specifically addresses the needs of the local population, where I am advocating the development of Pelham Street as an extension of the Brompton Cross boutique village.		Noted. The Council does concur with the view that the South Kensington Town centre is unusual in that it does serve two quite separate functions – the needs of the 12 million visitors to the South Kensington Museums each year, and the needs of the local residents looking for a more “traditional” town centre.  A relaxation of the policies controlling uses in the northern part of the centre and the areas of main footfall to the museums, whilst retaining a percentage based policy in the rest of a centre is considered to strike the correct balance.
John Eagle		Yes	Noted.
Victoria and Albert Museum (Steve Hyde)	The V&A considers that visitors to the museum's exhibits should be able to have access to a variety of retail and restaurant facilities to meet visitor needs either before or after they visit the V&A within the South Kensington District Centre.  The proposed area of relaxation, as shown in Figure 6.6, could help to contribute to an enhanced visitor experience to the District Centre and also linked trips to the adjacent South Kensington Strategic Cultural Quarter. However, these benefits need to be balanced against the ability of the wider District Centre to continue to also meet the needs of local residents.  The V&A considers that the proposed policy revision needs further clarification as to what the relaxed policy would be and assessment of any associated impacts upon vitality and viability upon the District Centre if the revised policy became adopted policy within the local plan partial review.		The Council recognises that the South Kensington Town centre is unusual in that it does serve two quite separate functions – the needs of the 12 million visitors to the South Kensington Museums each year, and the needs of the local residents looking for a more “traditional” town centre. “Liberalising” A Class uses in the north of the centre is considered appropriate as will help serve the needs of those visitors.  The need of residents will be served both by the restaurants and cafes in the northern section and by the rest of the centre –areas where a percentage based policy will remain.
Victoria and Albert Museum (Steve Hyde)		Don't Know	Noted.
South Kensington & Queen's Gate Residents Association (Caryl Harris)	LOCAL PLAN PARTIAL REVIEW: SOUTH KENSINGTON  I was very sorry not to be able to attend the meeting last week at the Science Museum to discuss the partial review of the Local Plan due to my business trip to Nigeria.  However , I am very keen to respond to the consultation as many of the subjects covered at your meeting and within your response questionnaire raise a number of concerns for my many members of this association. The transformation that has already taken place in South Kensington over the last 3 years has had an enormous impact upon all the residents in our area. The text assumes more cafes/restaurants are needed without making any assessment of the impact of the huge number of new café/restaurants which have sprung up in the last 3 years, nor does it take account of		The Council notes that the South Kensington Town centre is unusual in that it does serve two quite separate functions – the needs of the 12 million visitors to the South Kensington Museums each year, and the needs of the local residents looking for a more “traditional” town centre.  A relaxation of the policies controlling uses in the northern part of the centre and the areas of main footfall to the museums, whilst retaining a percentage based policy in the rest of a centre is considered to strike the correct balance.

Name	Comment	Selected Option	Council's Response
	the large number of new/expanded café restaurants which are already under construction.		
Exhibition Road Cultural Group (Emily Candler)	<p>South Kensington is both a District centre and international visitor destination. The retail and catering provision needs to serve those who visit, work, study and live in South Kensington.</p> <p>The museums and cultural institutions in South Kensington attract over 15.5m visits a year, in addition to the thousands of staff and students coming to the area every day. To maintain a high-quality visitor experience, it is essential to have sufficient catering – and at varying price bands.</p> <p>Cultural and educational organisations should be encouraged and enabled to develop catering and retail on their own sites to accommodate needs of visitors</p>		<p>The Council concurs with the view that it should balance the needs of the South Kensington Museums with those of local residents. Liberalising the northern part of the centre, but retaining a percentage based policy for the rest is considered to be an appropriate balance.</p> <p>The Council notes that the provision of catering or retail facilities to support a cultural use would ordinarily be considered to be ancillary to that use, and as such not require planning permission. The supporting text to CF7 (Arts and Cultural Uses) has been amended to explicitly recognise the role that such uses can have in supporting the ongoing future of the cultural uses, and where ancillary to the principal use, not be subject to the requirements of a retail impact assessment.</p>
Exhibition Road Cultural Group (Emily Candler)		Don't Know	Noted.
Jo Poole		No	Noted.
Christie's South Kensington (Francesca Filippini Pinto)	We believe that the Council should put its emphasis on attracting and facilitating a local retail experience of better quality on Old Brompton Road, Bute Street and Harrington Gardens. There should be a good proportion of independent, high-quality cafes and stores, which locals and visitors alike could enjoy.		Noted.
Christian Durie		Don't Know	Noted.
Christian Durie	As I don't know what it's percentage based policy is		Noted. This is fully explained within CF3.
Kerry Davis-Head		Don't Know	Noted.
Austin Mackie Associates Limited (Private Clients)	... whereas food and drink uses can serve a range of tourist, worker and residents' needs, there is surely no requirement for more souvenir shops.		Noted. The planning system does not give LPAs any control over the nature of an A1 shop - be this a butcher and baker or a souvenir shop.
Austin Mackie Associates Limited (Private Clients)		No	Noted.
South Kensington & Queen's Gate Residents Association (Caryl Harris)	<p>First, we would wish to oppose the Council's suggestion that the Council might "relax its percentage based policies in parts of the South Kensington District Centre to reflect its role in serving those visiting Exhibition Road and the Museums"</p> <p>Visitors/Residents This question has inherent bias (in favour of visitors and the Museums) and fundamentally misunderstands the importance and the role of South Kensington which serves local residents as a key district hub. South Kensington is a beautiful and historic residential area and has been thus for more than 150 years. The emphasis in the question on visitors is inaccurate (statistics show only 50% of users of the station are visiting local institutions/Exhibition Rd) and misplaced and damaging to residential amenity. In our view the balance between the needs of visitors and the needs of residents in the current policy is already seriously tilted unfairly and unjustifiably against the needs of residents and the residential amenity.</p> <p>Cafes/Restaurants The impact of the transformation in the area the previous policy has delivered in the last 3 years has seen useful and local shops convert to cafe/restaurants. The 'practicalities' and needs of Museums and visitors are already more than met – and indeed more cafes are on the way with the Museums building new expanding cafes</p>		<p>The Council notes that South Kensington does have a dual role. It does serve the needs of residents – but it does also serve the needs of many of the 12 million people who visit the museums each year. Liberalising uses in the northern part of the centre – will help serve the needs of visitors. The retention of a percentage based policy (80% of all shops in primary shopping frontages being retail) for the rest of the centre allows the needs of residents to continue to be served.</p> <p>The Council notes that the consultee suggests that the “need of museums and visitors” is already met. If this is the case, the pressure for additional tourist related uses is likely to reduce. The Council is not aware of any evidence which would suggest that this is the case.</p> <p>The Council notes that the consultee suggests that what is needed is retail A1 uses shops serving day to day needs of local residents and workers. Whilst this may be the case, these are not the types of uses that the market is likely to provide in the northern part of the centre. In reality the remaining A1 uses will serve the needs of tourists – be these A class cafes or shops selling souvenirs. It is beyond the remit of planning policy to control the nature of particular A1 shops.</p>

Name	Comment	Selected Option	Council's Response
	<p>inside their buildings (the V&amp;A, Natural History Museum and Science Museums) confirms this.</p> <p>What is needed is retail A1 use shops where local residents and workers (and probably visitors too) can buy fresh ingredients/a newspaper/a pint of milk/visit a bank. With the exception of the west end of the Old Brompton Road, useful shops serving everyday needs are unavailable.</p> <p>We disagree with the suggestion that "The Council could relax its percentage based policies in parts of the centre to reflect its greater 'service' role and reinforce the role of the remaining centre as serving the needs of the local populous. Increased costs for extra street cleaning and rubbish collection are funded by our taxes and this is completely disregarded. The policy also fails to take into account the sheer scale of overcrowding already in the area - something which increasing the number of café/restaurants will make far worse. South Kensington is being seen as a "Food Court".</p> <p>We also note that the south side of the block to the north of the station is broadly currently in office use. We would oppose the loss of still more small offices in the Borough, which this change in policy would facilitate.</p> <p>Extra deliveries would be made to these new areas – the combination of delivery lorries and pedestrians is a dangerous one – particularly in narrow streets that are already overcrowded.</p> <p>Street Markets Currently the market in Bute Street every Saturday and the Farmers market within the grounds of the University is, in our view more than enough. We would oppose the encouragement of street stalls and more street markets in the area in and around South Kensington for the reasons above which once again just adds to the overcrowding.</p>		<p>The Council notes that the consultee is concerned that the provision of more cafes and restaurants will increase costs of street cleaning and this need to be funded by taxes. This is not a planning matter. However, the benefits associated with the hosting a number of the world's "great museums" are considerable, both in terms of the tourist economy and the cultural life of the Borough.</p> <p>The proposed "service retail" policy for the northern part of the centre will not threaten the existing small offices on the northern part of Thurloe Street. The draft amended policy relates to the loss of A1 shops to A3 uses. There are no A class shops within this stretch of the centre. However, the Council does not wish to give the impression that the this parade is suitable for A3 uses and accordingly, the Council has removed this parade of units for the proposed "service retail frontage".</p>
Brompton Association (Sophie Blain)	<p>We would like to place on record our very strong objection to the suggestion made in Section 6 of the Council's consultation document under Question 6, namely that the Council consider relaxing its percentage based policies in parts of the South Kensington District Centre to reflect its role in serving those visiting Exhibition Road and the Museums. We consider this to be an entirely negative and retrograde proposal which, if allowed, would seriously erode the special quality and character of the area and have a most damaging effect on the amenity of local residents. We also think the environment for tourists and visitors to the area would be compromised if this policy were to be pursued.</p> <p>At 6.5.21 it states that visitors to Exhibition Road and to the Museums are looking for places to eat and perhaps buy a souvenir. The Museums themselves have their own large restaurants and their own shops. Visitors to the Museums will buy their souvenirs there. Tacky souvenir shops are exactly what is not needed in and around South Kensington and it seems to us such a policy would run counter to what South Kensington Estates (SKE) has been trying to do in recent years and also what TfL is beginning to do with its new policy of trying to encourage higher end quality retail at its underground stations.</p> <p>There was a very tacky souvenir shop on the east side of the lower end of Exhibition Road until quite recently. SKE were aware that this shop did not fit within their plans to improve the area and residents were very pleased when this unit shut down. SKE</p>		<p>The Council notes that South Kensington does have a dual role. It does serve the needs of residents – but it does also serve the needs of many of the 12 million people who visit the museums each year. Liberalising uses in the northern part of the centre – will help serve the needs of visitors. This include the bullnose and the block to the north of the station. The retention of a percentage based policy (80% of all shops in primary shopping frontages being retail) for the rest of the centre allows the needs of residents to continue to be served.</p> <p>The Council notes that the consultee suggest that "tacky souvenir shops are exactly what is not need in and around South Kensington". The planning system does not offer a LPA the powers to control the nature of individual shops. If the market seeks (and land owners allow) the provision of shops which serve the needs of tourists – then it is beyond the power of the LPA to stop this.</p> <p>The Council recognises that the concerns of the consultee regarding the "non-shopfront" units in the northern side of Thurloe Street, and the view that the "buildings are wholly unsuited to being turned into cafes and restaurants." Whilst current planning policy would allow some changes of uses to A3 uses in this stretch the Council does recognise that there are difficulties associated with such uses in properties with no shopfront. Whilst the proposed policy would not support further A3 uses in this location – being concerned only with existing A class uses (and not the office and SG uses currently occupying the ground and lower ground units) it may not be helpful. The Council does</p>

Name	Comment	Selected Option	Council's Response
	<p>have introduced high quality food shops such as the cheese shop and Brompton Food Market on their island site to the north of the station. Along the south of this site (the north side of Thurloe Street) is a terrace in mixed use including offices. This terrace was originally a C19th residential terrace and the houses are set back from the street behind railings and with raised columned classical porches. These buildings are wholly unsuited to be turned into cafes and restaurants.</p> <p>The area shaded pale blue on the Council's map that accompanies the consultation document shows the area where relaxation of current percentage based policies is proposed. This includes the whole of the SKE block to the north of the station. The idea that this entire block should be given over to café and restaurant use (presumably including the internal open space in the centre ( ie the former gardens of the terraced houses) is completely inappropriate. There are already plenty of restaurants and café along the lower end of Exhibition Road to serve the needs of all visitors.</p> <p>We also object strongly to the proposal to include the bullnose immediately to the west of the tube station as an area where percentage based policies might be lifted.</p> <p>We have argued for many years that the original shopfronts of the listed and highly attractive Station Arcade should be reinstated. These were designed by George Sherrin when he designed the Arcade and Booking Hall for the District and Circle Line c. 1900. The Arcade shopfronts are highly distinctive made of bronze and curved glass. The former Anglo Persian Carpet Company shop (now a chemists) remains in its entirety and parts of other original shop fronts survive. We have long argued for the retention of small shops in the Arcade, around the bullnose and along the south side of Thurloe Street. Allowing restaurant and café uses along the west side of the arcade and all around the bullnose would seriously compromise the objective of ensuring that the listed station, the listed arcade and the character of the Conservation Area is maintained and enhanced.</p> <p>We attach our letter to Mr Stallwood of September 25th last year which sets out what is important about the listed station and the buildings around it and why and how they need to be protected and conserved. We think that the Council's current review should take account of these important considerations. A blanket free for all of cafes and restaurants and tourist shops is exactly what South Kensington does not need.</p> <p>It is quite wrong to assert in 6.5.21 that shops in Bute Street, Old Brompton Road and Harrington Road serve the needs of local residents. Many residents living to the north or west of the station would not agree with this. Local amenity shopping is required around the station itself to serve the wider hinterland. Removal of current restrictions would thus seriously disadvantage a significant number of residents. 6.5.23 suggests that by relaxing percentage based policies at South Kensington all residents would be encouraged to use Bute Street/Harrington Road/Old Brompton Road, leaving South Kensington itself to become a monoculture for tourists. As stated at the outset, we consider this to be a serious retrograde step which would undermine the current policies of both SKE and TfL to raise the quality of shops around the station. It would also undermine the Council's aspirations as it would ultimately lead to the area immediately around South Kensington station sliding backwards towards a preponderance of low grade cafes and souvenir shops - exactly what the Council, the Museums, residents, and indeed discerning visitors, most certainly do not want to see.</p>		<p>not see these units all being occupied by A3 uses. As such the Council has removed this frontage from the proposed service retail frontage.</p> <p>The consultee suggests that local amenity shopping is required around the station to serve the wider hinterland. It is not in the LPA's powers to ensure that such shops are provided. Any shops which do remain are, in all likelihood, likely to meet the needs of the visitors of the museums rather than local convenience needs. Day-to-day needs of local residents will be met by the southern part of the centres and by centres elsewhere in the Borough. However, the Council does recognise the potential value that the existing small units within the arcade and those within the "bull nose" can have. It also recognises the ongoing discussions that TfL, the owners of the underground station and surrounds, have had with a number of the local resident groups. These discussions have led to a consensus regarding the mix of A class units in this area. As such it is appropriate to remove this area from that designated as being suitable for a greater number of non- shop A class uses – the service retail area.</p>

Name	Comment	Selected Option	Council's Response
Thurloe Residents Association (Traci K Weaver)	<p>Thurloe Residents Association would like to endorse the Brompton Association's further representations. The key issues are:</p> <ul style="list-style-type: none"> <li>- The assumption that the cultural institutions and their visitors' needs are more important than residents and other stakeholders;</li> <li>- The cumulative negative impact of having a further proliferation of food establishments – increased litter, vermin and dirty pavement - and the costs of keeping the area clean which is already a huge problem;</li> <li>- Expecting residents, many of whom are elderly, to go further afield for daily necessities;</li> <li>- Undermining the unique mixed and historic character of South Kensington making it more akin to Covent Garden.</li> </ul>		<p>There is a need to balance the needs of residents and visitors. The northern part of the centre already predominantly serves the needs of visitors, and the Council sees little value in requiring the retention of A1 uses – when these uses may be more suitable for an A3 use. This is not part of the borough where the day-to-day retail needs of residents can be met. These can be met by the rest of the centre and from shops within surrounding centres.</p> <p>A recent survey of the northern part of the centre would suggest that this portion of the centre is no longer “mixed” and have a very limited convenience function. There is a bookshop, an off-licence, a food market and a drycleaners. As set out above, these operators can all change without the need for planning permission.</p> <p>There also appears to be a concern that the loss of these uses forces people to have to travel long distances if they are to meet their daily needs. It should be noted that the rest of the centre will be unaffected by the proposal, as will a large number of centres in the vicinity.</p>
Kensington Society (Michael Bach)	<p>Should the Council relax its percentage based policies in parts of the South Kensington District Centre to reflect its role in serving those visiting Exhibition Road and the Museums?</p> <p>NO – things have gone too far and the policy needs to be put in reverse – it has been too skewed to visitors/landowners with insufficient concern about the impact on and services to residents. The "area of possible relaxation" should exclude TfL Properties who seem to accept the need for "curated" A1 uses.</p>		<p>The Council notes that South Kensington does have a dual role. It does serve the needs of residents – but it does also serve the needs of many of the 12 million people who visit the museums each year. Liberalising uses in the northern part of the centre – will help serve the needs of visitors. The retention of a percentage based policy (80% of all shops in primary shopping frontages being retail) for the rest of the centre allows the needs of residents to continue to be served.</p> <p>It is not realistic to suggest that the northern part of the centre can serve day today needs of residents. Even if shops are to remain, these will, in all likelihood, serve the tourist market. The units needed to serve residents will be provided elsewhere within the centre and by neighbouring centres.</p>
Kensington Society (Michael Bach)		No	
TfL (Lee Campbell)	<p>Shops Issue 1, Question 6</p> <p>Should the Council relax its percentage based policies in parts of the South Kensington District Centre to reflect its role in serving those visiting Exhibition Road and the Museums?</p> <p>Response: As per the comments above, TfL considers it is essential that any percentage based retail policy is sufficiently flexible. This is both for viability purposes to prevent vacant shops, but also to take into account the character and function of different destinations.</p> <p>The Bullnose is identified as a primary retail frontage and the arcade is identified as a secondary frontage. Both frontages are however included within a proposed 'Area of Possible Relaxation' in regard to the percentage based retail policy.</p> <p>TfL supports the draft designation of a policy relaxation area. This approach recognises the unique character and function of South Kensington Station, which predominantly helps serve the needs of those visiting Exhibition Road and museums. The function is constantly changing to meet market needs and can include a range of services, such as food outlets, restaurants, dry cleaners and gift shops.</p> <p>It is essential that policy is not overly restrictive to ensure it does not prevent TfL's curation of appropriate retail occupiers from responding to market trends and local needs. Flexibility in policy in relation to these retail frontages is therefore welcomed.</p>		<p>Support for proposed designation of “service retail frontage” noted. However, on reflection the area of possible retail relaxation has been reduced to include only the northern part of the centre north of Thurloe Street. This reflects the value that small shops within the station and within the Bullnose can play in meeting resident’s needs. It is the areas to the north which will have a greater role in serving the needs of tourists.</p>

Name	Comment	Selected Option	Council's Response
	<p>TfL however requests clarity of how the policy relaxation area would work in practice. This could be set out in a separate retail policy for relaxation areas, which would provide a much greater degree of flexibility for proposed changes to retail frontages to other town centre uses. TfL would welcome the opportunity to input into the wording of this policy.</p> <p>As set out in Question 5, TfL understands that the properties on Thurloe Street are no longer proposed to be designated as a secondary retail frontage. The proposed 'relaxation area' therefore does not extend to these properties. TfL supports this approach. However, if future versions of the draft plan designate Thurloe Street as a retail frontage, then TfL requests that the 'relaxation area' is extended to include these properties.</p>		
Cllr E Dent Coad	As above. Larger units will mean more car showrooms and the need for these is already served. Keep small units for independents.		Noted.

**Question 7:** Should the Council continue to ensure that street markets remain a vibrant part of the Borough's retail offer?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder	Again, stop interfering- if street markets are important they will flourish. If they are not important they will not be attended, and a lot of space will become available for another use.		Noted. The Council values the contribution that the Borough's street markets make to the local economy, the character of its centres and in serving the day-to-day needs of local people. As such it is appropriate to have a policy which seeks to support markets.
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		Yes	Noted.
J Hernandez		Yes	Noted.
Norland Society (Clive Wilson)	Anything to provide variety of local shopping		Noted.
Norland Society (Clive Wilson)		Yes	Noted.
Sonia Richardson		Yes	Noted.
J Neville		Yes	Noted.
Roy Burns		Yes	Noted.
John Eagle		Yes	Noted.
Jo Poole		Yes	Noted.
Turley (Ian Fergusson)		Yes	Noted.
Christian Durie		Yes	Noted.
Kerry Davis-Head	Farmers markets in particular.		Noted.
Kerry Davis-Head		Yes	Noted.
Austin Mackie Associates Limited (Private Clients)		Yes	Noted.
Silchester Residents Association (Jo Poole)	Double Yes		Noted.
ESSA (Anthony Walker)		Yes	Noted.

Name	Comment	Selected Option	Council's Response
ESSA (Anthony Walker)	Yes, but include encouraging 'pop-up' markets etc. in areas adjacent to main shopping centres such as Kensington High Street, i.e. specialist markets in the Town Hall precinct or in that of the Design Museum, possibly on a monthly basis.		Noted.
Kensington Society (Michael Bach)		Yes	Noted.
Kensington Society (Michael Bach)	Yes - including the re-provision of the Farmers' Market in Notting Hill Gate.		Noted.
Cllr E Dent Coad		Yes	Noted.

**Question 8:** Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

Name	Comment	Council Response
(Eva Skinner)	The residents think that the Council manipulate the retail sector of the area to promote their own agenda, which does not accord with the wishes of the residents. This should not happen without the consent of the residents as expressed through the Resident Associations.	The Council does not recognise this position. The Council very much welcomes the views of residents and resident associations as part of the Local Plan Partial Review consultations.
Kensington Society (Michael Bach)	There needs to be much more attention to neighbourhood centres as local places, especially more attention to improving the public realm and routes to these centres, as well as 20mph zones, clearing clutter, pedestrian facilities.	Noted.
Historic England (Katharine Fletcher)	<p>Town centres</p> <p>The Further Alterations to the London Plan introduced a higher growth direction for Kensington High Street. Historic England is concerned that this important centre with its highly significant heritage assets should not be placed under development pressures to the detriment of its character. We note that policies CF2, CF3, CV11 and CP11 are included in this review and trust that the Council will continue to protect the character and environmental quality of this important centre. The ground-breaking public realm improvements have been highly positive in underpinning the quality and vitality of the shopping centre.</p> <p>- Sources of information</p> <p>The review seeks to bring the plan up to date on a number of issues and in some areas Historic England has published advice notes. You may find the following useful, either to draw on in the supporting text, or as references:</p> <p>'Stopping the Rot' – A guide to Enforcement Action to Save Historic Buildings' – paras 2.1.2/2.2.10/2.3.23/2.4.14</p> <p>'Easy Access to Historic Buildings' - para 2.4.6</p> <p>'Planning Responsible Retrofit of Traditional Buildings' and 'Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations useful - policies CO7 and CE1</p> <p>'Flooding and Historic Buildings' - policy CE2</p>	<p>The Council has to have regard to the policies within the London Plan – a document which forms part of the Borough's own development plan.</p> <p>The Council recognises that much of the Borough is "under development pressure." We will continue to use the suite of policies within the Local Plan to ensure that all new development is of an appropriate form, scale and design.</p>

**Issue 2:** There has been a mismatch between the 'need' for new retail floorspace and its provision. Should the Council adopt policies to bring forward new retail floorspace?

**Question 1:** Should the Council prioritise the provision of Class A1 retail and other town centre uses on suitable sites in order to meet an identified need?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	
Charles Bezoari Elder	Who "needs" this new retail space exactly? You claim a mismatch, yet the only mismatch we residents see is that many would like to open retail outlets in the Borough (and do); while many residents feel strongly that there are far too many retail		There is a well-established methodology to establish retail need. It includes need from residents and from those outside the Borough, but still travel in to use the shopping facilities. The NPPF requires the Council to meet this

Name	Comment	Selected Option	Council's Response
	<p>outlets already, and that these survive not by satisfying local needs of local residents, but by attracting into our borough people from far and wide who are not residents. These have no "stake" in the borough, and only come to consume, congest, clog up, and dump their refuse on our streets.</p> <p>The constant retail expansion needs to be curtailed. Much thought and planning should be devoted to increasing the space for those who will have a "stake" in the borough- residential development that will allow families to locate, grow, and house further generations of these families in our borough. It is insane that the borough continues to create a situation where few new families can come to the borough, that once here they cannot have a family or increase a family and continue to live here, and that their children once grown cannot in their turn afford to live here. You are creating a constantly transient population by policies that are more concerned with devoting ever increasing space to retail, as opposed to residential.</p>		<p>objectively assessed need - to make full use of the benefits associated with vibrant and vital town centres.</p> <p>The Council concurs with the stakeholder in that it does not consider it appropriate to "require" the provision of retail floorspace outside of a centre. However, the Council does consider that occasionally additional retail floorspace outside of an established centre may be appropriate to assist in "place making" and to help serve the retail needs of local residents. The provision of this space does not hinder the ability of the Council to meet its housing need over the lifetime of the plan.</p> <p>The Council differs from the consultee in taking the view that a suite of policies are required to ensure a diversity of uses within the Borough. Without these policies the differential between residential and nearly any other use will mean that any non-residential uses are unlikely to be forthcoming.</p>
Onslow Neighbourhood Association (Eva Skinner)		No	Noted.
Norland Society (Clive Wilson)		Don't Know	Noted.
Sonia Richardson		Don't Know	Noted.
J Neville		Don't Know	Noted.
Roy Burns		Yes	Noted.
John Eagle		No	Noted.
Turley (Ian Fergusson)	This question is ambiguous and perhaps should be revisited at the next consultation.		Noted.
Turley (Ian Fergusson)		Don't Know	Noted.
Jo Poole		Don't Know	
Christian Durie	Not in our area.		Noted.
Christian Durie		No	Noted.
Kerry Davis-Head	<p>Care needs to be taken that carefully planned retail can then be changed to another use without planning permission. New retail space needs conditioning carefully. Again, a sandwich shop below a flat can easily become a fast food takeaway, with all the cooking smells invading the residential space above. A quiet shop could become a noisy space</p>		<p>The Council recognises that there have been a number of recent changes to planning regulations which do allow some freedom of movement within the use classes. However, this liberalisation is not complete, and the particular change of use raised by the consultee (A1 to A5 hot food takeaway) does at present still require planning permission.</p>
Austin Mackie Associates Limited (Private Clients)	The plan should recognise that sites outside of centres can provide retail, service or employment uses to meet the needs of the community		<p>Noted. Whilst the policies within the Local Plan must have regard to the NPPF and the "town centre first" approach for new town centre uses (including retail, employment and service uses), they also offer an appropriate degree of flexibility. For example, the amended Policy CF5 does not preclude new office uses outside of a centre. Similarly new retail uses with a floor area of less than 400 sq m will be supported in areas of retail deficiency.</p>
Austin Mackie Associates Limited (Private Clients)		Yes	Noted.
ESSA (Anthony Walker)		Yes	Noted.

Name	Comment	Selected Option	Council's Response
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	It is understood that the Council are considering the process of "allocating" previously identified sites for new retail development. It is understood that these previously identified sites were Kensal, Latimer and Earls Court. In this context, CEL would have no objection to these sites being allocated. CEL would raise concerns about other sites being allocated without a clear assessment of their potential impact on existing town centres or the overall hierarchy of identified retail centres in the Borough.		No other sites other than Kensal, Latimer and Earl's Court have been allocated for retail floorspace.
Barton Willmore (Paul Newton)	<p>Issue 2 (Policies to Bring Forward New Retail Floorspace)</p> <p>16. We support the identification of a new 'Centre' at the Site (Kensal). This should be reflected in the site specific policy and 'Shops and Centres' Chapter. Clarification is however required in relation to the type of Centre proposed, in order that an appropriate scale and range of uses can be provided to meet the needs of the wider Opportunity Area and its surroundings. The policy should allow flexibility in terms of unit sizes and should not restrict the amalgamation of units, in order that provision can appropriately respond to changing retail needs in the future.</p> <p>17. Clarification should also be provided in the Plan (preferably through the site specific policy) that a sequential assessment and retail impact assessment will not be required for either the new Centre at Kensal, or the relocation of the existing Sainsbury's store as part of the wider development of the Site.</p> <p>18. The consultation document recognises that the Council's retail evidence base is out-of-date and it should therefore be updated accordingly to inform future stages of the Plan and to ensure it can be found 'sound'. As part of the preparation of a new Retail Study for the Borough, consideration should be given to the quantum of retail floorspace that the development of the Site can support, and the Policy for the Site / Centre worded accordingly. Flexibility in the scale and format of retail uses should be allowed for.</p>		<p>Support for a new centre at Kensal is noted. Its function must be to meet the day-to-day needs of those living in the vicinity, both currently and as a result on the significant amount of new residential development in the opportunity area.</p> <p>The supporting text to Policy CF1 has been amended to explicitly note that an impact assessment will only be required when the proposal includes a net increase of more than 400 sq m. However, an impact assessment will be required to demonstrate that a new centre will not have an unacceptable impact on the vitality of any surrounding centres.</p> <p>The Council recognises the need for an update to the RLNA. This was confirmed as part of the Issues and Options consultation. An update has now been completed and concludes that the need for comparison floorspace to 2023 has reduced significantly since the initial 2008 study. This study has been published on the Council's website.</p>
Kensington Society (Michael Bach)	<p>There is a time lag between consents and implementation and permissions may be extended after the 3-year limit (eg Tesco in West Cromwell Road) as well as reopening vacant stores (eg Roberson wines at 348 Kensington High Street). All our centres need positive planning, especially neighbourhood centres, to maintain their critical mass and promote the diversity of provision, rather than a policy of "letting go". A number of centres, such as St Helens Gardens, and some secondary frontages, have been cannibalised by residential development taking the basement and rear and leaving unviable units. More attention if needed to maintaining viability for shops, but also for pubs and restaurants.</p> <p>Question 1 Should the Council prioritise the provision of Class A1 retail and other town centre uses on suitable sites in order to meet an identified need?</p> <p>Yes – but prioritising sites that complement rather than compete with existing centres. Allocating sites for both retail and other town centre sites will be essential replace losses due to changes in permitted development rights (PDRs). Maintaining the stock of units/floorspace will require close monitoring of changes within town centres and positive planning to plan for objectively-assessed need and to guard against the unnecessary loss of valued facilities and services (See NPPF para 70)</p>		<p>Noted. Existing Local Plan Policy CF(d) protects retail floor space within a centre unless it can be demonstrated that the loss will not adversely affect the function of that centre. "Cannibalising" of retail units for residential to leave unviable units is more a question of the proper implementation of the policy rather than the policy itself.</p> <p>The Council continually monitors changes in A class floorspace. The overall loss since the adoption of the Core Strategy (now known as the Local Plan) in 2010 has not been significant.</p> <p>Support for prioritising edge of centre sites for new A class floorspace is noted. However, in the current climate of reduced retail need, allocation for A classes may be inappropriate. This is not to say that new retail floorspace will not be supported as and when an application is made (subject to the requirements of the sequential test and impact assessment.)</p>
TfL (Lee Campbell)	Issue 2, Question 1 Should the Council prioritise the provision of Class A1 retail and other town centre uses on suitable sites in order to meet an identified need?		The Local Plan is explicit in referencing the NPPF and that housing may be an appropriate town centre use on upper floors. CF2 is however also explicit in ensuring that town centres are promoted as vital and viable centres. Residential uses can

Name	Comment	Selected Option	Council's Response
	Response: TfL supports the identification of retail and other town centre uses on sites where there is clear and robust evidence. TfL however seeks clarification whether the definition of 'town centre uses' includes residential and office uses in this context. TfL considers that the priority for the Borough should be ensuring the delivery of residential accommodation and supporting uses. Planning policy needs to provide a flexible position to support a variety of uses to ensure development is viable and deliverable. Restrictive retail policies should not undermine the delivery of new homes in new developments.		assist in this vision – but must be designed to ensure that the retail function is not harmed.
Cllr E Dent Coad	With Westfield, Ken High Street, Kings Road, Knightsbridge and Hammersmith so near our town centres can only survive if we do not attempt to compete but instead work to differentiate our retail offer. We must look at what we in the borough are known for and do best, and work hard to consolidate, intensify and improve this. Local independents are struggling but are a vital part of what residents and visitors recognise and wish to see prosper, so we must protect and encourage these small businesses.		The Local Plan recognises the value of diversity within our town centres. Centres such as The King's Road (East), Knightsbridge and Kensington High Street have a high proportion of larger multiples. This builds upon their particular function. The strength of others, for example the Portobello Road lies in the smaller independent sector.  The Council recognises that it is beyond the remit to control the type of retailers, or what is sold. However, seeking to maintain a mix of unit types for new large scale retail developments will assist in maintaining diversity.

**Question 2: Are there any sites that should be considered as a site allocation as part of the Local Plan Partial Review for Class A retail or other town centre uses? If so, please complete the Call for Sites section of the Consultation Response Form**

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted.
Sonia Richardson		Don't Know	Noted.
J Neville		Don't Know	Noted.
Roy Burns		Yes	Noted.
Roy Burns	Pelham Street		The expansion of the South Kensington centre towards Brompton Cross will be considered if and when an application is made. The updated RLNA does not indicate that there is significant need for new comparison retail space to 2023. Any application must include a study which considers the need for such floorspace, and its impact upon the vitality of neighbouring centres.
Sainsbury's Supermarkets Ltd (Indigo Planning)	The document refers to Local Plan Policy Cf1 which requires the provision of a centre in the Kensal Gasworks Strategic Site. Further information should be provided on the type and scale of centre proposed. It should be of sufficient size to ensure that an appropriate scale and range of uses can be provided to meet the needs of both the Opportunity Area and its surroundings.  Sainsbury's support the provision of a new centre at the Kensal Gasworks site but it should be reflected in both the site specific policy and 'Shops and Centres' Chapter.  Furthermore, the site specific policy and relevant retail policy in the Shops and Centres Chapter should make it clear that a retail impact and sequential assessment will not be required for the new centre and relocated Sainsbury's store at the Kensal Gasworks site.		The supporting text to Policy CF1 has been amended to make it explicit that the Council will only require an impact assessment when there is a net increase of retail floorspace of more than 400 sq m.  The Local Plan is clear that the function of the new centre within the Kensal Opportunity Area will be to serve the day-to day needs of those living within the vicinity and a newly developed area. As such the scale will depend on the scale of residential development within the Opportunity Area. The RLNA assessment has now been updated and published.

Name	Comment	Selected Option	Council's Response
	The document recognises that the Council's retail study is 'a little out of date'. In order to avoid the Local Plan being found unsound, we suggest that it be updated. This would then inform the retail policies in relation to the strategic sites and indicate the appropriate type and size of centre and quantum of floorspace, the Kensal Gasworks site could support.		
Kerry Davis-Head	Over development should not take place. Existing buildings could be upgraded or replaced with the same size and height. But care should be taken with new build.		Noted. The scale of any new build and its detailed design will remain an integral part of any consideration of future planning applications.
ESSA (Anthony Walker)	Yes, but as part of a more comprehensive review of the Pembroke Road Depot site.		Noted.
ESSA (Anthony Walker)		Yes	Noted.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	CEL considers there is the potential to create new active retail frontage at the north end of Pavilion Road in the block of existing buildings on the east side of Pavilion Road between Basil Street and Hans Crescent (7-49 Pavilion Road).  CEL have also identified the opportunity for additional small scale retail accommodation to be provided on the west side of Pavilion Road between 174 and 164 Pavilion Road. This will provide a natural extension to the existing retail strip located between Symons Street and Cadogan Gardens. It will also provide a complimentary use to the retail units that have been constructed between 237 and 255 Pavilion Road (East side).		Noted. Whilst each site may be suitable for retail expansion neither appears to be of a scale which would be suitable for an allocation. Any such proposal would be assessed on its merits having regard to the nature of the Borough's retail market at the time of any application.
Kensington Society (Michael Bach)	Question 2 Are there any sites that should be considered as a site allocation as part of the Local Plan Partial Review for Class A retail or other town centre uses? If so, please complete the Call for Sites section of the Consultation Response Form. Yes – Newcombe House site to include re-provision of the Farmers' Market.		Noted. The Notting Hill Gate SPD confirms the Council's support for the retention of the farmer's market in the area. However, given the "meanwhile" nature of the market it would not be appropriate to require its re-provision on a given site.
Kensington Society (Michael Bach)		Yes	Noted.

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

Respondent Name	User's Response: Free-Text (formatted)	Council's Response
Onslow Neighbourhood Association (Eva Skinner)	Our Association has seen letters sent to you by Brompton Association and Jane Whewell of Princes Gate Mews Residents' Association. We are in full agreement with both of those letters, as they fully express Onslow Neighbourhood Association position. In our view the balance between the needs of visitors and the needs of residents in the current policy is already seriously tilted unfairly and unjustifiably against the needs of residents and residential amenity.  Additionally we think, that not only there is already too many cafes and restaurants, but every new cafe or restaurant that opens around South Kensington, deprives the museums of the revenue that their own catering facilities need. We also think that any delivery to proposed retail shops in Pelham Street would block this busy street, and add to even more overcrowding of the narrow pavements of Pelham Street.  Our Association has filled the consultation documents on line.	Noted. This issue has been raised in more detail in response to question 6 of issue 1. See the Council's response in that section.
Earl's Court Partnership Ltd (ECPL)	Issue 2: On the mismatch, the Local Plan should allocate sites within or on the edge of centres to meet needs in full. This should recognise the potential of Earl's Court to accommodate retail uses to contribute to meeting needs.	The updated RLNA notes that there has been a significant reduction in the need for additional comparison floorspace to 2028. To 2023 the existing centres are broadly in equilibrium, with a modest need to 2028. Any proposal for the creation of new retail floorspace will be considered in

Respondent Name	User's Response: Free-Text (formatted)	Council's Response
		its merits – having regard to the impact that it will have on the vitality of neighbouring centres – as the time that the permission will be implemented and any retail provision comes into service.

**Issue 3:** The Borough's centres must be seen in the context of a hierarchy of centres. Do the Borough's centres lie within their correct position within this hierarchy, and are the boundaries of these centres still correct?

**Question 1:** Should the Council designate the Earl's Court Road Neighbourhood Centre as a District Centre?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted.
Sonia Richardson		Yes	Noted.
Earl's Court Partnership Ltd (ECPL)	We support the elevation of Earl's Court Road to District centre status. This should also refer to the potential to expand the offer of the centre and foster linkages with the Earl's Court development.		Noted. The relevant Place chapter has been amended to include the wider offer of the centre – and to foster linkages with the wider Earl's Court development.
John Eagle		No	Noted.
Jo Poole		No	Noted.
Kensington Society (Michael Bach)	Should the Council designate the Earl's Court Road Neighbourhood Centre as a District Centre? Yes – this centre needs positive planning to strengthen it. Whilst Capco have proposed a new neighbourhood/local centre in the LBH&F part of the Earl's Court site, this will not emerge as a competitor for at least 10 years. Meanwhile the Earl's Court community requires a better-performing centre – a district centre. The Society supports the proposal as well as the designation of secondary frontages.		Support for designation of the centre as a District centre is noted as is the proposed delineation of the primary and secondary frontages. This reflect the position of the centre in the Mayor's London Plan hierarchy. The frontage designation reflects the current distribution of shops within the centre and the areas of greatest footfall.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
J Neville		Don't know	Noted.

**Question 2:** Should the Council de-designate Ifield Road as a Neighbourhood Centre, considering it to be a small concentration of out of centre shops?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		Yes	Noted.
Sonia Richardson		Yes	Noted.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
J Neville		Don't Know	Noted.
John Eagle		Yes	Noted.
Jo Poole		No	Noted.

Name	Comment	Selected Option	Council's Response
Kensington Society (Michael Bach)	<p>Question 2 Should the Council de-designate Ifield Road as a Neighbourhood Centre, considering it to be a small concentration of out of centre shops?</p> <p>The Society agrees to de-designation provided that both the remaining shops and the Finborough Arms pub/theatre have sufficient protection.</p>		<p>Noted. Shops outside of a designated area will continue to be protected by CK2 of the Local Plan. The units lie within a conservation area and as such are not subject to the recent liberalisation of the GPDO. Policy CK2 is not subject to the current review.</p> <p>Pubs and theatres, either inside or outside of a centre are protected by the policies of the Local Plan.</p>

**Question 3:** Should the Council designate the concentration of shops and other town centre uses at the junction of Talbot Road and Powis Mews as a Neighbourhood Centre?

Name	Comment	Selected Option	Response
Charles Bezoari Elder		No	Noted.
Kensington Society (Michael Bach)	<p>Question 3 Should the Council designate the concentration of shops and other town centre uses at the junction of Talbot Road and Powis Mews as a Neighbourhood Centre? The Society strongly supports the positive planning approach proposed for Talbot Road/Powis Mews as a neighbourhood centre</p>		Noted. The designation is seen as enhancing the function of the modest concentration the shop and town centres uses in area.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
Sonia Richardson		Don't Know	Noted.
J Neville		Don't Know	Noted.
John Eagle		Don't Know	Noted.
Jo Poole		Don't Know	Noted.
Cllr E Dent Coad	If it means that existing local businesses get more support, yes.		Noted. The designation will offer a greater level of protection for the shops in this parade than previously existing. Planning permission has been replaced with a system of prior approval for all units outside of a conservation area. In considering prior approval the Council can only consider a limited list of specified issues. This includes the impact of the proposal on the function of a "key shopping area." Designation of the units as a neighbourhood centre – a "key shopping area" should put the Council in a stronger position should we wish to resist the loss of a shop.

**Question 4:** Should the Council designate a new Neighbourhood Centre at Latimer Road, close to the underground station?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted.
Norland Society (Clive Wilson)	Need good local shopping as a magnet for employment, and avoid the need to travel to centres such as Notting Hill Gate and Ken High Street		Noted. The designation will offer a greater level of protection for the shops in this area than previously existing. Planning permission has been replaced with a system of prior approval for all units outside of a conservation area. In considering prior approval the Council can only consider a limited list of specified issues. This includes the impact of the proposal on the function of a "key shopping area." Designation of the units as a neighbourhood centre – a "key shopping area" should put the Council in a stronger

Name	Comment	Selected Option	Council's Response
			position should we wish to resist the loss of a shop. This in itself could assist in better provision of shops and as such the need to travel. It should however be noted that the scale and function of this centre will be very different from either Notting Hill Gate or Kensington High Street. It may provide a convenience function but is unlikely to have a wider comparison function.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
J Neville		Don't know	Noted.
John Eagle		Don't know	Noted.
Norland Society (Clive Wilson)		Yes	Noted.
Sonia Richardson		Yes	Noted.
Jo Poole		No	Noted.
Silchester Residents Association (Jo Poole)	<p>There are a number of shops which are empty which suggests that no further retail is needed. (as is the case in St Helens just up the road).</p> <p>Latimer Road station is a 10 min walk from Portobello Road or Westfield, which provide a full range of shops and services from Apple and Mega M&amp;S to Poundland and vintage stores.</p> <p>Within a few hundred metres of the proposed neighbourhood centre residents have the two World Renowned Centres of Westfield for top end retail and Portobello Road for budget shopping.</p> <p>The shops further south on Bramley Road are often closing and re-opening which suggests there may not be demand for more shops. There are well established shops at St Helen's, Ladbroke Grove and further south as well as the existing shops on Bramley Road which is already subject to considerable traffic congestion and resulting pollution and could not take additional traffic. The residents of Silchester and MoreWest were offered aspirational cafés and retail as part of the MoreWest development. This has not materialised with the units remaining vacant. We do not want this to happen again as to do so would increase not address economic blight at a local level.</p> <p>A neighbourhood centre must serve the needs of current residents. The description of the area being poorly served in terms of shops is subjective. The shops are tailored to the local community, e.g. offering credit, which is unlikely to be the case with chains and new shops.</p>		<p>Noted. The update to the RLNA suggests that until 2023 there is no significant need for additional comparison floorspace. There is however more need for convenience floorspace – floorspace most likely to be provided by the Latimer Road centre. In addition a small neighbourhood centre will serve a very different function from Westfield or, to a lesser extent, Portobello. Its function will be to serve the day-to-day shopping and service needs of those who live or work in the area.</p> <p>The designation will offer a greater level of protection for the shops in this area than previously existing. Planning permission has been replaced with a system of prior approval for all units outside of a conservation area. In considering prior approval the Council can only consider a limited list of specified issues. This includes the impact of the proposal on the function of a “key shopping area.” Designation of the units as a neighbourhood centre – a “key shopping area” should put the Council in a stronger position should we wish to resist the loss of a shop.</p> <p>The Council notes the concern that an empty shop has no value, and shares this concern. As such any designation will be kept under review.</p> <p>The Council does note that it cannot control the type of shop, what it sells, or for example, whether or not it offers credit. Ordinarily the market will provide what is needed in a given area, although the Council does recognise that this will not always be the case and there is a possibility that the shops being provide will not serve a specific or expected local need.</p>
Kensington Society (Michael Bach)	<p>Question 4 Should the Council designate a new Neighbourhood Centre in Bramley Road close to Latimer Road underground station? The Society strongly supports the positive planning approach proposed for a new neighbourhood centre.</p>		<p>The designation will offer a greater level of protection for the shops in this area than previously existing. Planning permission has been replaced with a system of prior approval for all units outside of a conservation area. In considering prior approval the Council can only consider a limited list of specified issues. This includes the impact of the proposal on the function of a “key shopping area.” Designation of the units as a neighbourhood centre – a “key shopping area” gives the Council a stronger position should it wish to resist the loss of a shop.</p>
Cllr E Dent Coad	If this means provision of shops and businesses that existing residents need, yes.		Noted. The designation will offer a greater level of protection for the shops in this parade than previously existing. Planning permission has been replaced with a system of prior approval for all units outside of a conservation area. In considering prior approval the Council can only consider a limited list of specified issues. This

Name	Comment	Selected Option	Council's Response
			includes the impact of the proposal on the function of a "key shopping area." Designation of the units as a neighbourhood centre – a "key shopping area" gives the Council a stronger position should we wish to resist the loss of a shop.

**Question 5:** Should the Council designate a new Neighbourhood Centre at Kensington High Street close to the junction with Warwick Road?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
Norland Society (Clive Wilson)	Possibly, to service all the new developments along Warwick Road, and avoid the need for travel to shop		Designation of a small neighbourhood centre may assist in the provision of the shops and other service uses which may serve the day-to-day needs of those living in the vicinity.
Norland Society (Clive Wilson)		Don't Know	Noted.
Sonia Richardson		Yes	Noted.
J Neville		Don't Know	Noted.
John Eagle		No	Noted.
Jo Poole		No	Noted.
ESSA (Anthony Walker)	Yes and possibly include the small shops at the end of St Mary Abbot's Place to protect their use.		The shops at the northern end of St Mary Abbots already lie within the Kensington High Street (West) Neighbourhood Centre. As such there is a presumption against any loss.
ESSA (Anthony Walker)		Yes	Noted.
Kensington Society (Michael Bach)	Yes – but it will mean narrowing the uses to A class uses, which do not include car showrooms.		The Council considers that there is no reason why a car show room cannot form part of a neighbourhood centre. Whilst the car show room (a sui generis) use will not be protected, its replacement with a use which would harm the retail function of the centre could be.
Kensington Society (Michael Bach)		Yes	Noted.

**Question 6:** Should the Council subsume the properties within the Fulham Road/ Brompton Cemetery Neighbourhood Centre into the secondary frontage of the Fulham Road (West) District Centre?

Name	Comment	Selected Option	Council's Response
Charles Bezoari Elder		No	Noted.
Onslow Neighbourhood Association (Eva Skinner)		Don't Know	Noted.
Norland Society (Clive Wilson)		Don't Know	Noted.
Sonia Richardson		Don't Know	Noted.

Name	Comment	Selected Option	Council's Response
J Neville		Don't Know	Noted.
John Eagle		Don't Know	Noted.
Jo Poole		No	Noted.
Kensington Society (Michael Bach)		Yes	Noted.

**Question 7:** Are there any other parades of shops currently lying outside of any centre which are of a scale or nature that should be designated as a Neighbourhood Centre, or any Neighbourhood Centres which no longer function as such?

Name	Comment	Council's Response
Charles Bezoari Elder	No.	
Roy Burns	As already noted: Pelham Street	Noted. See comments for question 2 of issue 2.
Christian Durie	It is not clear in Chapter 18 Lots Road/World's End, on the map if it is considered a 'Neighbourhood Centre'  Please preserve our parade of shops on King's Road, between Edith Grove and Beaufort Street. SW10 & SW3	The parade of units running on the southern side of the King's Road from Milman's Street to Edith Grove lie, and will continue to lie within the World's End Neighbourhood Centre.
Kerry Davis-Head	The shop fronts of the Cremorne estate provide a vital mix of usable shops and need protecting from major chains.	The parade of units running in front of the Cremorne Estate lie, and will continue to lie within the World's End Neighbourhood Centre. Whilst the units provided of a size less likely to be of the type usually occupied by multiple retailers, the planning system does not allow a LPA to influence the nature of a shop, what it sells, or who owns it. As such the planning stem cannot protect any shop, however "valued" from another.
Kensington Society (Michael Bach)	no	Noted.

**Question 8:** Do you have any comments on the Council's other proposed changes to the boundaries of existing centres?

Name	Comment	Council's Response
John Eagle	I hope that you do not intend to change in any way whatsoever the parade of shops on the Kings Road at World's End. There is a strong local feeling that RBK&C intend to "improve" this row of shops and many locals within our Residents Association believe that such "improvement" would be very detrimental, if it were to increase rents and thus change the current excellent mix of businesses.	The Council does not propose to amend the World's End Neighbouring Shopping Centre designation. Its function should remain as a centres which serves the day-to-day needs of local residents. The Council does, however, note that the nature of individual shops, or rental levels are beyond the remit of the planning system.
Roy Burns	I am arguing for the development of Pelham Street as an expansion of the boutique village at Brompton Cross. The narrowness of the pavements mean that commercial development is currently inappropriate but this could be effected if the street were to be pedestrianized.	The Council has no plans to pedestrianise any of the roads in the Brompton Cross area. A significant amount of new retail floorspace at the edge of this centre will be assessed against the provision of CF1 and CF2. It will be subject to both the sequential test and a retail needs assessment. This reflects the changing nature of retail within the Borough and a dramatic decrease in need for addition comparison retail floorspace to 2023 and 2028 from that predicted in 2008.
Turley (Ian Fergusson)	The Council should consider expanding the extent of the Portobello Road Special District Centre. As things stand the outline of the Centre only accommodates sites which are already developed. However the Council's adopted Westway SPD identifies other land which immediately adjoins the centre for town centre uses. In	The amended RLNA indicates that there is only a limited need for additional comparison floorspace across the Borough until 2023. This rises to 2028, but given the uncertainty associated with predictions of retail need the Council is reluctant to rely on these predictions for retail need over the longer term. As such whilst an expansion of retail floorspace at the Portobello

Name	Comment	Council's Response
	order to help achieve its objectives for this Centre the Council should consider redrawing this Centre so that its boundaries encompass this land as well.	Road may be appropriate – and not have a detrimental impact on the vitality of either the Portobello Road or nearby centres – it should be subject to its own impact assessment. This must have regard to retail need at the time of likely implementation.
Yves Alexandre	<p>I write on behalf of the Kensington Square Residents' Association. Our members are concerned by the deterioration in standards seen in the part of Kensington High Street between No's 1 and 35 (south side), which is in great contrast to the improvement in retail offer seen elsewhere in Kensington High Street. While adjacent parts of Kensington High Street have attracted major stores such as Whole Foods, Currys/PC World, Maplin, Zara and the like, the state of No's 1 to 35 remains poor.</p> <p>We believe that the Council should aspire to an improvement in this area and should see it as a core part of Kensington High Street's retail offer. We ask therefore that, in your current review of the Kensington High Street "Place" in the Consolidated Local Plan you upgrade nos 1 to 35 from being "Secondary Frontage" to "Primary Frontage". This will have a number of knock-on benefits, such as requiring a greater footway width to be kept available for shoppers, making it easier to enforce against A-boards and other unlicensed obstructions and, I hope, encouraging the Council to take a more active approach to the management of commercial waste.</p> <p>We believe that this re-designation and the associated amenity improvements, will encourage commercial property owners to see the opportunities for higher quality retail and will clearly demonstrate that the Council values this part of Kensington High Street no less than it does the other parts.</p>	Licencing requirements, for footfall widths etc are not the subject of this Local Plan Partial Review. However, the amended Local Plan does re-designate this stretch of Kensington High Street as a primary rather than a secondary shopping frontage. This reflects the relatively high footfall within this part of the centre. A primary designation also reflects the important role that retail uses have to play in this part of the centre.
Gerald Eve obo CEL - Cadogan Estates Ltd (Neil Henderson)	<p>CEL fully support the proposed addition of the rear of 127-135 Sloane Street and 237-255 Pavilion Road as part of the secondary shopping frontage. This is clearly consistent with Cadogan's redevelopment plans that the Council have permitted for this area and fully supports the function of the existing primary shopping frontage. CEL considers there is the potential to create new active retail frontage at the north end of Pavilion Road in the block of existing buildings on the east side of Pavilion Road between Basil Street and Hans Crescent 7-49 Pavilion Road.</p> <p>CEL have also identified the opportunity for additional small scale retail accommodation to be provided on the west side of Pavilion Road between 174 and 164 Pavilion Road. This will provide a natural extension to the existing retail strip located between Symons Street and Cadagon Gardens. It will also provide a complimentary use to the retail units that have been granted between 237 and 255 Pavilion Road (East side).</p>	<p>The Council notes support for including the properties to the rear of 127-135 Sloane Street and 237-255 Pavilion Road as part of the secondary shopping frontage of the King's Road (East) major Centre. This designation reflect the recent development on the site, and the expansion of the retail frontages in this part of the centre.</p> <p>The Council notes the suggestion that the boundary of the town centre be extended to units on the west side of Pavilion Road. Given the lack of evidence that there is any significant need for additional retail floorspace to 2023 it is not considered appropriate to expand the centre. Any out of centre additional floorspace should be subject to an impact assessment to ensure that the expansion is not at the expense of the vitality of existing centres. The amended Local Plan notes that this assessment should be proportionate and reflect the scale of the retail expansion.</p>
Kensington Society (Michael Bach)	<p>I would like to propose to the redesignation of 1-35/35a Kensington High Street as a "primary retail frontage" because:</p> <ul style="list-style-type: none"> <li>• it has a high proportion of A1 retail uses;</li> <li>• it has a high footfall compared to other secondary retail frontages, as it is key point or entry/exit for the High Street and carries footfall going to the High Street and public transport and to attractions to the east (e.g. Albert Hall);</li> <li>• it has a narrow footway in relation to these flows; and</li> <li>• the acceptable clear footway width seems to be interpreted by frontage designation rather than footfall or a mix of uses plus footfall.</li> </ul> <p>The "crude" secondary retail frontage designation does not adequately take account of the range of applications – planning and licensing – that flow from this designation.</p> <p>Please take this as a formal request as part of the Partial Review of the Local Plan.</p>	The Local Plan includes the re-designation of the parade of units 1-35a Kensington High Street as primary retail; frontage. This reflects the relatively high footfall of this part of the centre, a level more akin to a primary than a secondary designation.

Name	Comment	Council's Response
Victoria Road Area Residents' Association (Michael Bach)	I would like to support the comments below. The main problems here are: <ul style="list-style-type: none"> <li>• Unauthorised new shopfronts and fascia – two very recently</li> <li>• Lack of level access for disabled – failure to negotiate changes at the time of consent as most are retrospective (see above)</li> <li>• A-frames obstructing the main pedestrian flow, as well as cordoning off areas in from of a nightclub (1 Kensington High Street) and a new burger restaurant</li> <li>• Piles of waste on the footway</li> <li>• Filthy areas around lampposts where rubbish is piled (especially 1 Kensington High Street)</li> </ul>	The Local Plan includes the re-designation of the parade of units 1-35a Kensington High Street as primary retail; frontage. This reflects the relatively high footfall of this part of the centre, a level more akin to a primary than a secondary designation.
Daniel Moylan	May I offer my support to the Kensington Square Residents' Association.  I receive more complaints about the state of this stretch of Queen's Gate ward than about any other. It is starkly different in appearance from almost any other street in the Royal Borough, offering a very poor introduction to Kensington High Street to those approaching from the east. This is in large measure related to the poor levels of on-street enforcement that arise from the designation of nos 1-35 as "Secondary Frontage". Like Mr Alexandre, I do think that it is time that the Council set high aspirations for this part of Kensington High Street and gave itself the policy tools to help drive improvements. A re-designation to "Primary Frontage" as part of the current review is well justified and highly desirable.	The Local Plan includes the re-designation of the parade of units 1-35a Kensington High Street as primary retail; frontage. This reflects the relatively high footfall of this part of the centre, a level more akin to a primary than a secondary designation.

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

Name	Comment	Council's Response
J Neville	For review: Ledbury Road South to be considered separately to Westbourne Grove which is a main road for commercial use, Ledbury Road South is a residential street on a side road.  Concerns: 1) There is a concern A1 licensed premises are being used as quasi A3 premises. At a recent Licensing Hearing 26/01/16 this was raised as it seems to be a 'grey area' which leaves residential streets/properties vulnerable to businesses opening as quasi restaurants/bars.  2) A licensing application for a premises license at 61 Ledbury Road was recently submitted but withdrawn whilst 57 Ledbury Road applied for a Premises License which was granted. There does not seem to be a way to prevent the whole of our short Street becoming licensed premises causing public nuisance of noise, traffic, taxis etc already experienced with Beach Blanket Babylon.  3) An application for a premises licence in Ledbury Road may want to also use 1st floor of the building for food and drink and it has been suggested there is a precedent of first floor (and above) use by businesses in Ledbury Road. My understanding is that those businesses using first floor and above are pubs/ex-pubs or purpose built offices not retail. There is a concern that use could be changed to a food and drink business use above ground floor can this happen?  4) RBKC does not have a Cumulative effect policy unlike Westminster Council which Ledbury Road North is a part of. At a recent Licencing Hearing 26/01/16 the residents of Ledbury Road South were informed there was only one Licensed premises in our short Street (BBB) so a licensed premises at 57 Ledbury Road would	The Council is of the view that the part of Ledbury Road running south from Westbourne Grove functions as part of the wider town centre, and as such should not be re-designated as a separate centre. The centre operates like many others in that the core areas contain the highest concentration of shops, with the more peripheral areas containing higher numbers of restaurants, cafes, bars and other supporting uses. The Council does, however recognise the particular role of the centre – and the need to maintain a high proportion of shops if it is retain its position as a specialist shopping area providing high end fashion retailing.  As such – whilst the existing diversity of uses is supported, there is a presumption against the loss of any existing shops to other A class uses, where this will result in less than 80% of units in a given parade being in a non shop use. This policy should “prevent the whole of the street becoming licensed premises”. There is no intention of allowing the street to become “a food and drink destination” and the policies are in place, and continue to be in place, to stop this from occurring.  The Council does however recognise that it can only work within the use classes order and existing planning regulations. A unit can sell food but remain an A1 class use.  Ledbury Road is unusual in the number of A1 shops that remain. The Council's 2015 town centre survey would suggest that of the 18 units only 3 are currently an A3 use, with a further 3 in an alternative A town centre use. Despite this small number, any further loss of an A1 unit on either the west or east side of the road would fail to comply with the provisions of the policy. The amended Local Plan will not change this position.  The Council does not concur with the views of the consultee that, “Ledbury Road South is designated a residential street and not a commercial area.” It does lie within the Westbourne Grove Special District Centre, with the authorised use of the ground floor units being commercial.

Name	Comment	Council's Response
	<p>not give rise to a cumulative effect. Beach Blanket Babylon (BBB) however can have approximately 200+ on the premises at one time which in a short Street has a huge impact despite being only one premises.</p> <p>5) Ledbury Road South is designated a residential street not a commercial area. I supported a Special District Shopping street initially to promote a diversity of small independent shops but with the ease of obtaining a premises license I no longer think this is appropriate for a short Street as there is nothing to stop most/many businesses applying for a premises license.</p> <p>6) Many of the buildings in Ledbury Road South were built around 1846 and they were not designed for use as quasi cafes/restaurants/bars nor as licensed premises.</p> <p>7)The community of Ledbury Road South is long standing over 40 years for some. We are supportive of each other and our small businesses beneath where we live. We have very good relations with all of our shops. We want to protect our small A1 diverse independent shops.</p> <p>8) If there is a problem with footfall making it difficult for small independent businesses to thrive in a high rent area, a cut in the business rates could be considered to support these shops rather than allowing the whole character of our short Street be changed to a food and drink destination.</p>	<p>Whilst there may be residential uses on upper floors, this is a pattern of land uses characteristic of many of the Borough's town centres.</p> <p>The Council supports the ambition to retain a mix of retailers within the centre. Support for the independent retailer as part of the vision for the centre. However, the Council does recognise that the planning system does not allow a LPA to favour one type of retailer over another. An independent retailer can change to a multiple without the need for planning permission.</p>
Victoria and Albert Museum (Steve Hyde)	<p>There may need to be review of the boundary of the South Kensington District Centre to possibly extend the boundary adjoin part of the South Kensington Cultural Area given the linked retail and leisure trips by visitors to both the District Centre and the Cultural Area.</p> <p>The Plan also needs to consider reviewing whether the South Kensington District Centre only performs the role of a conventional "District Centre", as given in Figure 6.1, and should not be re-designated as a "Special District Centre" given the proximity of the centre to the South Kensington Strategic Cultural Area.</p>	<p>Given that there is no evidence of significant retail need to 2023 it is not considered appropriate to extend the boundary of the South Kensington Town centre. Any application to provide new retail floorspace will be considered on its merits, having regard to both the sequential test and the impact that the creation of additional retail floorspace has upon the heath and the vitality of nearby centres.</p> <p>Designation of a District Centre remains appropriate. The importance of the South Kensington Museums is reflected by the designation of the area as a Strategic Cultural Area.</p>
The Chelsea Society (Michael Stephen)	<p><b>SHOPS AND CENTRES</b></p> <p>We consider that the existing map gives the impression that the focus is on ribbon retail development along the King's Road and Fulham Road. We believe that it should show many other attractive/important features like the adjacent hospitals, schools, churches, cinemas and even pubs to give a better picture.</p> <p>We agree with the statement on page 154 of the Consolidated Local Plan that "shops, financial and professional services uses and restaurants/cafes are ... valued, for both the service that they provide and their wider social role. This essential mix of uses in the borough's predominantly residential areas, not only makes these areas highly desirable places in which to live, helping to provide services locally for the community and beyond, but adds to the character and distinctiveness of the borough as a whole. The approach of maintaining and protecting a broader range of uses also brings greater benefit to the wider community, rather than favouring a particular group within it."</p> <p>There is a danger that the King's Road is becoming just another shopping centre. There is a place for the international chains, but the special character of the King's Road derives from the smaller independent businesses who do not need, and cannot afford, large floor-areas. The Society believes that these businesses should be encouraged by the planning system, by the rating authority, and by the landowners - including the Council itself. The amalgamation of small units into larger units should be discouraged.</p>	<p>Comment on maps noted.</p> <p>Support for maintaining a mix of uses within the borough's centres noted.</p> <p>The Council's vision for the King's Road recognises the value of the independent retailer. However, the Council recognises that it is not part of the remit of the planning system to support one type of retailer over another. Planning permission is not required for a change of use from one type of retailer to another. Similarly the amalgamation of smaller retail units into larger units is not normally development which requires planning permission. In order to maintain as much diversity as possible the Council will require the provision of a range of unit sizes when any new larger scale retail developers are proposed.</p> <p>The appearance of a building, rather than merely its function, is considered by the polices elsewhere within the Local Plan. These polices were reviewed in 2014 and are not the subject of the current review.</p> <p>The ambitions and long term plans of the Post Office is not the subject of the Local Plan. A post office is an A1 use and as such will be supported within any of the Borough's town centres. Similarly, it is beyond the remit of the planning system to provide for "high quality" or indeed any other butcher, baker, fishmonger or greengrocers. The market/ landowner decides what uses will be provided.</p>

Name	Comment	Council's Response
	<p>There is perhaps too much emphasis on the nature of the retail outlets and not enough on the physical appearance of the buildings. Part of the unique character of the King's Road is the quirky and heterogeneous facades, and it should be an aim of the Council's policy to preserve them.</p> <p>There is very little attention paid to the needs of local residents as customers of the shops. There is for example no hardware shop east of World's End, and there are very few high quality butchers, bakers, fishmongers and greengrocers.</p> <p>The central aim– to preserve small businesses on the King's Road – is incompatible with the proposal for a Crossrail 2 station at the corner of King's Road and Sydney Street.</p> <p>The King's Road has been enhanced by the development of the Duke of York Square, and by the continued existence of the Chelsea Old Town Hall as a venue for meetings, weddings and other events, and for the public library, which is an important community asset.</p> <p>There is an urgent need for a Post Office between World's End and Sloane Square. Preferably in the former Post Office building opposite the Old Town Hall.</p> <p>We agree with the statement on page 87 of the CLP that there are in Chelsea many buildings, especially those built in the 1950's 1960's and 1970's which are of substandard design and/or construction and that replacement with a building more appropriate to its context would be welcome. The Chelsea Society will endeavour to identify some of them during 2016.</p>	
Jo Poole	Let things evolve. They don't need designation (goes for entire section)	The Council notes the view but is of the opinion that the designation of centres, and the protection of shops within them, has value as can assist in the provision of uses which will meet both the day-to-day needs of local people or which have a wider, pan London retail function. Town centres help maintain the diverse mix of uses within the Borough and can contribute to both the local and to the wider economy.
Silchester Residents Association (Jo Poole)	The Council, Architects and Developers should when making presentations ensure that they clearly define what is aspirational and what they have the control to deliver.	Noted.
Kensington Society (Michael Bach)	<p>6.4 Evidence base: Diversity: We are very concerned by the rapidly changing mix following the Government's changes to permitted development rights, especially the expansion of estate agents and cafes/restaurants at the expense of shops. The evidence presented is a 2015 snapshot – how has it changed over time and is the Council monitoring the growth of A2 and A3 uses in specific local centres – as the Council needs to be prepared to issue an Article 4 Direction when excessive concentrations start emerging such as:</p> <ul style="list-style-type: none"> <li>• Holland Park Avenue</li> <li>• Notting Hill Gate</li> <li>• Kensington Church Street</li> <li>• Gloucester Road North</li> <li>• South Kensington/Harrington Road</li> <li>• South Kensington/Thurloe Street/Exhibition Road</li> </ul> <p>NB: The Notting Hill Gate Place Chapter (Para 16.3.3) already recognises that the Council can use Article 4 Directions to control permitted changes of use. This needs to be recognised in the Fostering Vitality chapter as well as all the place chapters where this would be relevant.</p>	<p>The Local Plan contains policies concerning the loss of A1 to A2 uses. These will be material were an article 4 direction be used were the Council be minded to control such changes of use in the future. Currently, the Council has no plans to make such article 4 directions, but this position will remain under review.</p> <p>The AMR considers net loss of all A1 floorspace on an annual basis. This is broken down to include loss to C3 uses as well as other uses. The Council recognises that the AMR does not directly report on changes of uses which do not require planning permission, other than through a review of number of retail units on a centre by centre basis.</p>

Name	Comment	Council's Response
	<p>Retail Need:</p> <p>6.4.6 The "leakage" of space out of A1 use needs careful monitoring, such as through conversion to A2 or A3 uses. It is not clear how much of this has been captured in annual monitoring shown in Figure 6.4.</p> <p>6.4.7 It is not clear how much of the losses of A1 space has been to housing, including the cannibalisation of retail space by converting basements or rear storage space to housing.</p> <p>6.4.10: Will the new retail needs assessment include all the information on losses or will it just have a new baseline.</p>	