

Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Section 4: Site Allocations

Issue 1: There has been progress in delivering most of the strategic sites since the Local Plan was drafted (as the Core Strategy in 2010). The Council needs to consider whether it is appropriate to update the Local Plan to reflect the progress that has been made to make the Allocations and Designations chapter easier to use and to identify new (strategic) sites.

Question 1: How could the Allocations and Designations chapters be improved?

Name	Comment	Council's Response
1 Port of London Authority (Helena Payne)	3) Site Allocations Does the Borough's site allocation consideration identify sites which may impact on the Thames (PLA interests)? It is unclear from the submission whether there has been any thought on this matter. In addition, care will need to be taken with regard to any sites that may affect, or be affected by, the Borough's safeguarded wharf.	The Council is seeking to remove Cremorne Wharf's safeguarded status, but there are no new site allocations that would have an impact on the wharf.
Port of London Authority (Helena Payne)	4) Climate Change The use of alternative transport, as discussed above would assist in the aims and objectives set out within this chapter. The London Plan supports the need to find alternatives to road transport, and looks favourably on sites which enable rail or water use. The PLA would emphasise the need to priorities sites (economic/industrial/minerals and waste, in addition to some residential development) which have access to alternative transport.	The Council supports the use of alternative transport particularly rail, no opportunities for water travel have emerged.
2 John Eagle	The Local Plan is so large a document that it is completely unreasonable to expect individual residents to wade through all of it to try to find the parts which affect them, and on which they would like to comment. I strongly suggest that the whole consultation process is deeply flawed	We are sorry you found the document too large but the Local Plan has to be produced to comply with planning legislation and guidance so there is no leeway.
3 Kerry Davis-Head	Updated detail	The details in the Local Plan have been updated throughout.
4 Catalyst Housing (Martyn Freeman)	CHL consider that the Allocations policies should remain in place, including on sites such as Wornington Green where planning permissions are being implemented. The Allocations should be updated where necessary to reflect progress on site and ensure that opportunities for development on allocated sites are maximised. With regard to Wornington Green, Phase 2 was granted reserved matters permission in July 2014 and work is due to start on site in Spring 2016.	The Wornington Green site allocation has been retained, the text has been updated to reflect delivery to date.
5 Royal Brompton & Harefield NHS Foundation Trust (RBHT)	Update the Allocations and Designations Chapter with progress achieved to date on already Allocated sites and introduce additional sites as proposed and promoted by Royal Brompton and Harefield NHS Foundation Trust in the Call for Sites.	The chapter has been updated with progress to date on allocated sites. The Chelsea Farmers' Market site has been allocated, although this

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		was not submitted to the call for sites, the Sydney Street hospital wing extension will not be allocated because this site is already in hospital use so allocation is not necessary.
6 Savills (Aimee Squires)	<p>In response to Question 1, we support the retention of Earl's Court as standalone Places chapters. 2. Site allocations – Warwick Road (5 sites including 100 West Cromwell Road) 100 West Cromwell Road is designated as a strategic site 'Warwick Road' along with 4 sites to the north including Charles House, Former TA, Empress Telephone Exchange and Homebase sites.</p> <p>The Warwick Road strategic site was designated to meet a significant proportion of Borough's housing target, with a focus on a high quality residential environment. Paragraph 25.2.1 states – A primarily residential development with mix-use will ensure that the borough's housing targets are met. Non-residential floorspace is needed to service the proposed residential accommodation with an active frontage to Warwick Road. Paragraph 25.2.2 – 100 West Cromwell Road is constrained by the existing podium adjacent to the Tesco Store.</p> <p>Policy CA6 states – The Council allocates development on the site to deliver, in terms of 1,550 total combined residential units across all five sites, with a minimum of: a minimum of 350 residential units on the 100 West Cromwell Road site; on the 100 West Cromwell Road site leisure, social and community uses (Class D1), provision of car parking and open amenity space.</p> <p>In terms of infrastructure and planning obligations the following are priorities – affordable housing, social and community facilities, community sports hall and swimming pool, health facilities, crèche and education facilities, landscape improvements in connection with 100 West Cromwell Road site, streetscape improvements, floorspace for Safer Neighbourhoods unit, contribution to investigate one-way to two-way system and other contributions where necessary.</p> <p>Paragraph 25.4.6 outlines the existing permissions for the subject site –Application submitted for a scheme for 367 residential units with crèche, health and fitness centre and community sports hall, which is yet to be determined. Revisions submitted to the above proposal, but with a reduction to 347 residential units (the subject of a separate application), which is yet to be determined.</p> <p>Outline planning permission was granted in 1996 for the redevelopment of the greater 'Fenelon Place' site to provide a three phase development. Phases one and three have been implemented and comprise the existing Tesco store with housing above and the Kensington Westside residential development respectively phase two was for a office building (14.864 square metres) and has not been implemented. The phase two site is now known as the 100 West Cromwell Road site.</p> <p>As part of the Local Plan Partial Review, the Council has provided an update on the progress that has been made in bringing forward the strategic aims for the Warwick Road strategic site. Paragraph 4.3.8 of the Local Plan Partial Review Document states – The five sites were allocated for a total of 1,550 residential units. Planning permission has been given for 1,178 to date. The site allocations also included the provision of a primary school, on site public open space, community sports hall and swimming pool and funding for a number of streetscape improvements to Warwick Road and West Cromwell Road.</p> <p>Redevelopment of Charles House, allocated for 500 units, will be complete when the school opens in September 2016. 439</p>	The Earl's Court place chapter has been widened to include the Warwick Road strategic sites. The Warwick Road site allocations have been updated to reflect the development already complete.

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	<p>residential units will be delivered. The Former Territorial Army site, allocated for 250 units, has planning consent for 281 units. Empress Telephone Exchange allocated for 150 units, has consent for 158 and the Homebase site allocated for 350 units has consent for 300 units. The former Charles House site, Telephone Exchange and Homebase site have all been implemented and are in various stages of completion. The primary school is being provided together with on site public open space and funding towards the streetscape improvements in addition to funding for education and leisure facilities in the Borough. These sites also include affordable housing. The site at 100 West Cromwell Road allocated for 350 units currently has no extant permission. The future development of this site should include the community sports hall and funding towards streetscape improvements.</p>	

Question 2: Are there other aspects of the existing strategic sites policies which need updating? If so, please identify which ones and what the issue is.

Name	Comment	Council's Response
<p>1 Nathaniel Lichfield & Partners (NLP) (Simon Slatford)</p>	<p>Representations to Kensington and Chelsea Local Plan Partial Review: Issues and Options</p> <p>This letter has been prepared by Nathaniel Lichfield & Partners (NLP) on behalf of our client, St William.</p> <p>St William is a joint venture between National Grid and the Berkeley Group, established to bring forward regeneration and the redevelopment of decommissioned National Grid sites and to deliver major residential and mixed-use development schemes across London and the south-east. The Berkeley Group brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of new homes. In respect of the Royal Borough of Kensington and Chelsea (RBKC), St William has an interest in the National Grid owned site at the former Kensal Gasworks in Kensal Green.</p> <p>This letter comprises formal representations to the Issues and Options document in respect of the emerging RBKC Local Plan. St William notes that National Grid has had recent discussions with officers at RBKC in respect of this site. On the basis that the Kensal Gasworks site is already allocated for a mixed-used strategic allocation, it was agreed that it is not necessary to submit a 'Calls for Sites' form to the Council. St William fully supports the retention of this specific site allocation for mixed-use regeneration.</p> <p>These representations are solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group or National Grid.</p> <p>St William welcomes the opportunity to be involved in the revisiting of the emerging Local Plan. These representations provide comment in relation to a number of questions posed within the consultation document. However they are predominantly focused on the Kensal Gasworks site allocation for mixed-use development, and policies relating to housing mix and viability.</p> <p>In overall terms, St William consider that the Plan, which will set land use policy up to 2028, needs to be ambitious, yet fully deliverable. It needs to ensure that the housing needs of the Borough can be met, and that key strategic brownfield sites, such as Kensal Gasworks, are optimised to their full potential to help meet London's well established housing need.</p> <p>Since the publication of the Core Strategy, there have been considerable policy changes both within the National Planning Policy</p>	<p>The Kensal Canalside Opportunity Area site allocation has been continued. The Council is working very closely with the landowners to understand the level of development that can be delivered on the site and how this might be enhanced through investment in new infrastructure. This is detailed in the Kensal Canalside DIF and Transport studies which form part of the evidence base for the draft Local Plan. This is reflected in the strategic site allocation. The Council is aware of the need to comply with the NPPF and the London Plan.</p>

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	<p>Framework (NPPF, 2012) and Further Alterations to the London Plan (FALP, 2015).</p> <p>At the heart of the NPPF is a 'presumption in favour of sustainable development' and the requirement for local authorities to "boost significantly the supply of housing" (paragraph 47). The FALP clearly sets out the Mayor of London's intentions in respect of housing need and supply. Policy 3.3 states "The Mayor recognises the pressing need for more homes in London" and that this housing need is to be met through provision consistent with at least an annual average of 42,000 net additional homes London-wide. At Table 3.1 the Mayor has set an annual housing target for RBKC of 733 per year (7,330 minimum ten year target). Policy 3.3(D) states that Boroughs should "seek to achieve and exceed the relevant minimum borough annual average housing target in Table 2.1".</p> <p>The London Plan policy position has also progressed and now allocates the Kensal Gasworks site as an Opportunity Area.</p> <p>In light of the above policy changes which place a greater emphasis on the delivery of new homes, we set out our comments and justification in respect of our requested amendments to the emerging Local Plan below.</p>	
<p>1 Nathaniel Lichfield & Partners (NLP) (Simon Slatford)</p>	<p>Overview</p> <p>In summary, St William is supportive of the overall vision and site allocation for Kensal and the Kensal Gasworks site, however suggest the following amendments to ensure that a comprehensive mixed-use regeneration of this strategic site is realised.</p> <p>Emerging policy must be maintain the positive vision for this site and the Council must ensure consistency with the FALP by acknowledging the increased housing target of a minimum of 3,500 dwellings, as well as the Government's policy change in respect of ensuring a significant boost to housing supply.</p> <p>As stated throughout our representations, this site represents the last significant strategic brownfield site within the Borough without planning permission that is capable of delivering any substantial residential development. Emerging policies must ensure a co-ordinated approach by all landowners. Policies should therefore specifically reference that a comprehensive regeneration of the site is required. If land comes forward for development incrementally, the full potential of the site, for the benefit of the whole Borough, will not be achieved.</p> <p>St William acknowledges that the site requires accessibility improvements. Whilst the Council's ambition for Crossrail is supported, the future regeneration capabilities of the site should not be dependent on Crossrail coming forward and the site specific policies should clearly reference that improvements to wider public transport improvements, including bus routes, would be suitable options for the site. As stated above, the potential for the improvements to public transport will be dependent on the scale of development.</p> <p>The site presents a series of unique and specific issues, in light of the required decommissioning and decontamination that will significantly impact on viability. To ensure that a viable mixed-use development is able to be delivered, it is essential that the Council uses this opportunity to create an ambitious but pragmatic policy for this site. Reliance on Borough-wide policies in respect of S106 agreements, housing mix and tenures should not be applicable to this site.</p> <p>We consider that the proposed revisions set out within these representations are appropriate and will assist in ensuring a comprehensive, viable and deliverable regeneration of the Kensal Gasworks.</p>	<p>As above, the Council is working closely with the landowners to ensure comprehensive development of the site.</p> <p>The Kensal Canalside Transport and DIF study has tested the level of development that can come forward viably with and without a Crossrail station and other interventions.</p>
<p>1 Nathaniel Lichfield & Partners</p>	<p>Section 4 'Site Allocations'</p>	<p>See above.</p>

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(NLP) (Simon Slatford)	<p>Kensal Gasworks: Qu 1: How could the Allocations and Designation chapters be improved?</p> <p>The Kensal Gasworks site allocation is contained at Policy CA1 of the Consolidated Local Plan 2015. St William is supportive of the original site allocation which is positive in its allocation for upwards of 2,500 dwellings, 10,000sqm offices and 2,000sqm of non-residential floor space. St William is also supportive of the Council's vision for a Crossrail station. However, the delivery of a Crossrail Station is dependent on numerous factors; the Council's approach to policy for the gasworks site must be flexible in this respect. The envisaged housing capacity for the site should be increased to reflect more current requirements to boost the supply of housing, particularly on previously developed sites in London, and this should be balanced against appropriate improvements to transport infrastructure and not made reliant solely on a Crossrail station being developed.</p> <p>The London Plan policy position has progressed since CA1 was originally drafted and the Kensal Gasworks site is now allocated as Opportunity Area 18 within the FALP 2015. We consider that the Local Plan must reflect this which states the following:</p> <p>"Indicative employment capacity: 2,000 Minimum new homes: 3,500</p> <p>Kensal Canalside has significant development potential and an opportunity to promote regeneration in north Kensington and adjoining boroughs. The scope and scale of development as an Opportunity Area is dependent on resolution of a number of challenges and constraints. Improved public transport accessibility will be a major determinant of the final scale of development. Rail and canal corridors form barriers to north-south movement within and beyond the site and should be address to knit development into the surroundings townscape. Linkages with the Park Royal Opportunity Area and the potential strategic public transport infrastructure hub and interchange at Old Oak Common should be addressed. The opportunity to build over the railway tracks and to address constraints imposed by existing gasholders should be investigated."</p> <p>Paragraph 4.3.2 of the consultation document acknowledges that the designation in respect of the number of homes has increased to a minimum of 3,500 dwellings, but this is followed by "However, paragraph A1.3 of the London Plan states, "It should be noted that in some Areas the transport system would not currently support this level of growth and developer contributions may be required to underpin enhancements"". It is understood that the Council's preferred vision for the site is for a Crossrail station to come forward so as to significantly increase the site's PTAL. As set out above, this is supported by St William but the policy must be clear in stating that the delivery of the minimum housing target of 3,500 dwellings is not dependent on Crossrail coming forward and may involve other appropriate public transport improvements, including bus links and new roads, as set out at Policy CA1(q).</p> <p>It is accepted that the existing access arrangements into the site will require improvement, together with measures to improve accessibility for future residents. This could be in the form of new bridge crossings, enhancement of cycling facilities, improvements to the existing public transport system and travel plans. The accessibility improvements should comprise a joined-up approach with all landowners within the site to ensure that these come forward as part of a viable package of proposals linked to a comprehensive redevelopment for the site which optimises the whole site's potential. St William therefore request that the site allocation is updated to explicitly require a comprehensive redevelopment of the whole site. St William would also suggest that the 'land use allocation' is updated to include a 'or other appropriate public transport improvements' alongside the Crossrail allocation at Policy CA1(b). It is essential that the Council's vision for a Crossrail station does not serve to impede in any way the delivery of new homes and</p>	<p>Building a bridge over the railway is one of the infrastructure initiatives the Council has investigated. Building over the tracks has not been considered because construction would require closure of the mainline which is considered prohibitively expensive.</p> <p>Delivery of housing numbers is determined by the constraints of the site, particularly the site currently having one route in.</p> <p>Various development scenarios have been investigated and the infrastructure necessary to support each level of development identified, including a Crossrail station.</p> <p>The cemetery is only open during the hours of daylight so unfettered access is not possible.</p> <p>As stated Kensal is the borough's</p>

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	<p>comprehensive regeneration envisaged by the London Plan for the Opportunity Area.</p> <p>As set out at above, we request that Figure 3.1 is updated to state that the 'improved linkage' from the gasworks site to the Cemetery is reliant on unfettered access to the Cemetery. There is no certainty that there could be improved linkages from the Gasworks site through to the cemetery for the reasons set out above, and the policy must be flexible in this respect.</p> <p>St William would request that CA1(g) is updated to recognise this restraint on the cemetery: "improved infrastructure including new pedestrian and cycling links, new roads which connect the site into its surrounding context and other public transport links, including improved connections over both the railway lines and the canal. Links across the canal are reliant on unfettered access to the Cemetery."</p> <p>This site allocation could be improved by ensuring that the policy text is more ambitious and specific. Due to the characteristics of the Borough; RBKC do not have a significant supply of strategic brownfield sites that have a development potential of over 3,000 homes. This is acknowledged at Paragraph 3.3.6 of the consultation document that states that the Kensal Opportunity Area is "the last remaining major brownfield site in the Borough without planning permission". Housing developments in RBKC predominantly comprise incremental increases in housing numbers. The Council should therefore recognise the importance of this strategic site and its potential to make a significant contribution to RBKC's increased housing target set for the Borough as a whole, by setting an ambitious yet pragmatic policy.</p> <p>In conclusion, the allocation is acceptable; however it should be updated to:</p> <ul style="list-style-type: none"> • Increase the housing target to a minimum of 3,500 dwellings to ensure compliance with the NPPF and FALP; • Acknowledge that the site requires appropriate accessibility improvements, but is not dependent on a Crossrail station; and • Require a comprehensive redevelopment of the full site to ensure that the regeneration proposals optimise the full potential of this last remaining major brownfield site but which also appropriately mitigates impacts, enhances a sense of place, provides appropriate community facilities all as part of an overall viable scheme. • If land within the Gasworks site comes forward for development on a fragmented basis, the opportunity to secure the benefit of comprehensive redevelopment will be missed and the full potential of the site, for the community, will not be achieved. It is therefore submitted that the Policy be amended to include a presumption against piecemeal development which does not bring forward comprehensive development on the site. 	<p>last strategic brownfield site and the Council will require that it is developed in a comprehensive manner.</p> <p>The site allocation has been amended to a minimum of 3,500 residential units, although as with the London Plan allocation this is dependent on transport infrastructure improvements.</p>
2 Earl's Court Partnership Ltd (ECPL)	<p>On behalf of our client, Earls Court Partnership Limited (ECPL), please find enclosed representations to the Local Plan Partial Review, which is subject to public consultation until 9 February 2016. ECPL has a vested interest in the emerging policy position given the redevelopment of the Earls Court Site, which benefits from outline planning permission (reference PP/11/01937).</p> <p>The outline planning permission has been implemented and the demolition of the Earl's Court Exhibition Centre is underway.</p> <p>The representations enclosed with this correspondence include the following:</p> <ul style="list-style-type: none"> • A summary table which provides comments against relevant sections of the Partial Review. 	<p>The Earl's Court Place chapter has been re-written.</p> <p>The site allocation has not been changed except to include the policy CT2 e. text as proposed in</p>

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	<p>• A mark-up of the existing Earl's Court specific section of the adopted Local Plan (Chapters 10 and 26), which highlights areas which should be updated to better reflect the progressed nature of the project.</p> <p>We request that these comments are taken into consideration as the Local Plan progresses to the preferred options consultation stage. A detailed review of the housing chapter (Chapter 10) has also been undertaken. ECPL wishes to discuss a number of complex matters with the Council associated with housing. We therefore also request that a meeting is set up to discuss detailed representations relevant to this Chapter.</p>	<p>issues and options.</p> <p>This meeting has taken place.</p>
2 Earl's Court Partnership Ltd (ECPL)	<p>Para 4.3.10</p> <p>Figures need to be sense checked, including whether these account for the consent at West Brompton (reference PP/15/00369). As above, the reference to implementation should be expanded.</p>	As above.
3 Savills (Aimee Squires)	<p>The Site</p> <p>The site at 100 and 100A West Cromwell Road is located on the northern side of West Cromwell Road at its junction with Warwick Road. It is bounded by Fenelon Place to the north and the west London train line to the west. The site has a frontage of approximately 120m to both West Cromwell Road and Warwick Road.</p> <p>The site is strategically located and is very well connected. The site is located on the edge of the Royal Borough of Kensington and Chelsea and the London Borough of Hammersmith and Fulham, representing the gateway to London from the west. It is located approximately 530m from Earl's Court underground station; 430m from West Kensington underground station; and 840m from Kensington Olympia underground station. Baron's Court, Gloucester Road and High Street Kensington underground stations are also located in close proximity.</p> <p>The site currently comprises a large Tesco store with supporting retail addressing the West Cromwell Road frontage and 75 affordable housing units managed by the Notting Hill Housing Trust along the Warwick Road frontage. The development also comprises a large car parking area on the western portion of the site and comprises coach and lorry parking at basement level.</p> <p>Since the original planning application (ref no. TP/93/00434) was approved in 1993 and then partially implemented (Tesco store and affordable housing), several planning applications have been brought forward, either addressing the whole site, or the individual components (100 and 100A West Cromwell Road). Planning applications proposed a development comprising 296 flats and a 24 storey building (ref no. PP/00/1540), a development comprising 433 flats and a 27 storey building (ref no. PP/05/02073) and a development comprising 367 flats and 24 storey building (ref no. PP/08/00676 and PP/08/00677).</p> <p>Planning permission (ref no. PP/11/00107) was granted in 2012 for a development relating to both 100 and 100A West Cromwell Road, which included five buildings up to a maximum of 13 storeys to provide 278 residential dwellings. According to the Local Plan the site (100 and 100A West Cromwell Road) is located within the Earl's Court Place. 100 West Cromwell Road is designated as a strategic site 'Warwick Road' along with 4 sites to the north including the Charles House, Former TA, Empress Telephone Exchange and Homebase sites. As a result of previous piecemeal planning and implementation, the site is now partially developed and is largely underutilised. Despite having significant potential, the site currently offers limited planning and community benefits. The site is</p>	The Council has included 100a in the Warwick Road site allocation.

Name	Comment	Council's Response
	considered to present an opportunity to bring forward a comprehensive redevelopment of the site to regenerate this part of the Earl's Court area.	
4 John Eagle	<p>The Local Plan is so large a document that it is completely unreasonable to expect individual residents to wade through all of it to try to find the parts which affect them, and on which they would like to comment.</p> <p>I strongly suggest that the whole consultation process is deeply flawed</p>	We are sorry you found the document too large but the Local Plan has to be produced to comply with planning legislation and guidance so there is no leeway.
5 Jo Poole	It is not clear which policies you refer to.	We are sorry you found this unclear, you may find it easier to comment on the draft version of the plan.
6 Sainsbury's Supermarkets Ltd (Indigo Planning)	<p>Sainsbury's welcome the continued allocation of the Kensal Gasworks site in line with the identification of the site as an Opportunity Area in the London Plan. Policy should, however, have sufficient flexibility:</p> <ul style="list-style-type: none"> • to allow the redevelopment of the site independent of the station; or • should it transpire that a new station cannot be delivered, provide guidance as to how the site should be delivered. 	<p>The Council is working with the Kensal landowners to identify how the site's constraints can be overcome and the best development can be delivered. The Transport and DIF studies have shown how a Crossrail station would help to optimise development on the site.</p>
7 Kerry Davis-Head	The individual questions are difficult to answer online without a printed copy of the whole document	We are sorry you found this difficult, hard copy versions of all planning consultation documents are provided in local libraries for reference.
8 Catalyst Housing (Martyn Freeman)	Please see response to Question 1 above.	Response above
9 Barton Willmore (Paul Newton)	<p>Issue 1 – Question 2 (Existing Strategic Sites Policies)</p> <p>10. Ballymore fully supports the continued allocation of the Kensal Gasworks Site, reflecting its identification as an Opportunity Area in the London Plan. We also recognise that improved public transport accessibility will be a major determinant of the final scale of development at the Site. However, it is critical that the Plan is clear that the Site has the potential to deliver a high-density sustainable development, and realise significant social, economic and environmental benefits without a new railway station. Similarly, the Local Plan should not seek to safeguard land within the Site for a future railway station.</p> <p>11. Therefore the policy need only contemplate and be supportive of two specific scenarios: the comprehensive regeneration of the</p>	<p>The Council is working with the Kensal landowners to identify how the site's constraints can be overcome and the best development can be delivered. The Council has identified that there is a window of opportunity to build the station during the</p>

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	<p>site with and without a rail station development. Secondly, the Plan should recognise, in the absence of a site specific SPD, that the scale of development at the site should be informed by a number of key determinants, including the capacity of the site to accommodate and deliver improved public transport accessibility. It should also provide an indication of the heights and densities necessary in order to achieve the quantum of development required by the Plan.</p> <p>12. In considering on-site waste management and energy generation, Ballymore considers that facilities need to be justified and viable. It is not considered that waste treatment / anaerobic digestion facilities would be required or justified at the Site and could reduce the ability to deliver the wider aspirations for the Site.</p>	<p>construction of the new station at Old Oak Common. This is likely to be in advance of development of most of the site.</p> <p>A development infrastructure funding study has been produced for the site as part of the evidence base for the draft plan.</p>
10 Savills (Aimee Squires)	<p>In response to Question 2, the existing strategic site policies need updating as follows –</p> <p>Paragraph 25.4.6 should be updated to demonstrate that the planning application submitted for a scheme for 367 residential units etc has been decided. Paragraph 25.4.6 should also be updated to include more recent planning applications that have been submitted and/or approved including PP/11/00107 and PP/15/03067.</p> <p>Policy CA6 should be updated to reflect the Borough's current housing target. The target of 1,550 dwellings across the five sites, and 350 dwellings at 100 West Cromwell Road was set according to a previous housing target. The Borough's housing target has now increased to 11,278 new dwellings (to 2027/28) and the targets should therefore reflect the increased demand.</p>	<p>The strategic site allocations have been amended to reflect progress with delivery.</p> <p>The Council has identified how it will meet its housing targets, the approach suggested is not appropriate as each site has its own capacity.</p>
11 Earl's Court Partnership Ltd (ECPL)	<p>Issue 1, Question 2</p> <p>The commentary on the status and progress of the Earl's Court project needs to be expanded. Annotated versions of Chapters 10 and 16 of the adopted Plan have been prepared and are provided for consideration.</p>	<p>The Earl's Court Place Chapter has been re-written.</p> <p>The site allocation has not been changed except to include the policy CT2 e. text as proposed in issues and options.</p>
12 LCR (Barry Gilbert)	<p>The Kensal Gasworks site will make a significant contribution towards meeting the borough housing target and development must optimise residential opportunities through achieving high densities, consistent with adopted Consolidated Local Plan (2015) Policy CA1. The North Pole Depot site would be suitable for high-density development, subject to its availability – see below.</p>	<p>The Council is very keen to see the North Pole Depot released for development, it could be the key to unlocking the development of the wider Opportunity Area</p>
12 LCR (Barry Gilbert)	<p>In addition to the general comments on Kensal Opportunity Area above, LCR on behalf of the DfT would comment on the Kensal Gasworks site allocation (a current allocation under Policy CA1 in the Consolidated Local Plan, 2015) as follows.</p> <p>The DfT owns the North Pole Depot site, which is identified in the current Local Plan as the 'South Site' located to the south of the Great Western Mail Line / Crossrail tracks within the Kensal Gasworks allocation (Policy CA1).</p> <p>The DfT supports the general aspiration for high-density regeneration of the wider Kensal Gasworks site for a range of housing and</p>	<p>The Hitachi /Agility depot is in</p>

Name	Comment	Council's Response
	<p>commercial / job opportunities (including retail and community facilities) – as set out in the current Consolidated Local Plan (2015) Policy CA1.</p> <p>However, it is important to recognise that the North Pole Depot site is currently in operational railway use. This includes:</p> <ul style="list-style-type: none"> - the Hitachi / Agility Trains depot for intercity express maintenance on part. - land acquired by Crossrail under compulsory purchase powers near Barlby Road for a replacement Network Rail storage compound. - Network Rail and other users also use other parts of the North Pole Depot site from time-to-time. <p>Parts of the site are vacant but this varies in extent and location from time-to-time. In addition, the Depot site is currently 'safeguarded' for use in association with HS2.</p> <p>LCR, on behalf of the Department for Transport, will work with the planning authority to enable the development of land not required for operational rail purposes, but it is not envisaged that the North Pole Depot site will be able to be sold and / or made available for housing / commercial development in the short to medium term. The 'risk' cited in current Local Plan paragraph 20.3.1 should be retained in any Plan update (i.e. "North Pole Depot is not released for redevelopment"). In addition, the reference in paragraph 20.4.5 to the site being vacant is incorrect and should be replaced to reflect the existing operational uses on the site and 'safeguarding'.</p> <p>In the light of on-going operational use of the North Pole Depot site, the current Local Plan 'Projected delivery milestones' (paragraph 20.3.6) for Phase 2 (southern and western sites) should be adjusted. We would suggest that consideration is given to splitting the phases into Phase 2 (western site) and 3 (southern site). The delivery milestones for suggested Phase 3 are currently unknown. However, the DfT will be considering the site's future later this year and we will advise on this subsequently in the Local Plan preparation process.</p> <p>In the longer term, if the North Pole Depot site is released for development, the DfT would support significant residential-led regeneration. As indicated above, the DfT does not consider that development is reliant on a Crossrail station being developed at the wider Kensal Gasworks site; and irrespective of this opportunities should be taken to improve public transport accessibility to the various component sites and also to integrate the new development into the area in which it sits. The future suitability of the North Pole site for residential development is not reliant upon new pedestrian, cycle and / or vehicular links across the railway line and improved access into the residential area to the south of the Depot. However, redevelopment would provide the opportunity to improve access and permeability as part of the comprehensive regeneration. We consider the site to be appropriate for the high-density development envisaged in current Local Plan Policy CA1. The DfT and LCR looks forward to engaging with the Council and other stakeholders when it is decided to, once-again, progress the SPD for the Kensal Gasworks site.</p> <p>Finally, references in the current Local Plan to "British Rail Board (Residuary)" should be replaced with "London and Continental Railways and Department for Transport" in list of Delivery Agencies, paragraph 20.3.3; and to "Department for Transport" in list of Site owners, paragraph 20.4.4. In addition reference in paragraph 20.4.1 to the "Former North Pole Railway Depot" should be adjusted to delete "Former" – the site is in operational depot use.</p> <p>These representations are submitted by LCR on behalf of the Department for Transport (DfT). LCR is wholly owned by the DfT and</p>	<p>LBH&F not RBKC, The Council understands the North Pole East site is not in active railway use. However, beyond this the Council does not understand why this site cannot be released, particularly since it could frustrate wider development of the site and prevent improving east west connections as well as delivering a significant number of homes (circa 1,000). There is a window of opportunity to build a bridge during the construction of HS2 currently identified as 2022-23 and the bridge would need to be built across to the North Pole Depot.</p> <p>References to British Rail Board (Residuary) have been removed.</p>

Name	Comment	Council's Response
	<p>specialises in the management, development and disposal of property assets within a railway context, and in particular property assets associated with major infrastructure projects.</p> <p>These representations are focussed on the potential development of the North Pole Depot, which is located to the south of the railway tracks in Kensal Opportunity Area. The eastern part of the Depot is in RBKC, the western part in London Borough of Hammersmith and Fulham. The Department is working closely with the Old Oak and Park Royal Mayoral Development Corporation to support the development of the neighbouring Old Oak Common area for housing and commercial use.</p> <p>The DfT acquired North Pole Depot from BRB (Residuary) Ltd (BRBR) in September 2013. LCR manages North Pole Depot on behalf of the DfT.</p> <p>Please see our comments below in respect of the site allocation for the Kensal Gasworks (which includes the North Pole Depot site).</p> <p>In general terms, the DfT considers that there are significant residential and commercial development opportunities within the Kensal Opportunity Area. Whether or not a Crossrail station is developed at Kensal, opportunities should be taken to improve public transport accessibility to the various sites and also to integrate the new development into the area in which it sits. The future suitability of the North Pole site for residential development is not reliant upon new pedestrian, cycle and / or vehicular links across the railway line and improved access into the residential area to the south of the Depot. However, redevelopment would provide the opportunity to improve access and permeability as part of the comprehensive regeneration.</p>	
13 HSE (John Moran)	<p>CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY HSE</p> <p>LOCAL PLAN PARTIAL REVIEW (LPPR) ISSUES AND OPTIONS CONSULTATION</p> <p>Thank you for your request to provide a representation on the above consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved.</p> <p>HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance:</p> <ol style="list-style-type: none"> 1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents 2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended¹ requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described 	<p>The Council is aware of the Hazardous Substances Consent relating to this site, which is explained in the strategic site allocation for Kensal, and welcomes the advice contained in this submission.</p>

Name	Comment	Council's Response
	<p>in Article 13 of Council Directive 2012/18/EU (Seveso III)2. Regulation 10(c)(i) requires that regard also be had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes</p> <p>At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents3. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: http://www.hse.gov.uk/landuseplanning/padhi.htm</p> <p>Encroachment of Local Plan Allocations on Consultations Zones</p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocations that could be effected are shown in the attached Annex.</p> <p>Compatibility of Development with Consultation Zones</p> <p>The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.</p> <p>Housing Allocations</p> <p>Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.</p> <p>Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare.</p> <p>Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.</p> <p>Workplace Allocations</p> <p>Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m² total floor space are compatible with the inner zone.</p>	

Name	Comment	Council's Response
	<p>Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.</p> <p>Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with the middle zone.</p> <p>Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m² total floor space are compatible with the outer zone.</p> <p>This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on Development Type Tables of HSE's Land Use Planning Methodology, which is available at:</p> <p>http://www.hse.gov.uk/landuseplanning/methodology.pdf Verification of Advice using the Web App</p> <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website: http://www.hse.gov.uk/landuseplanning/padhi.htm . When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.</p> <p>Identifying Consultation Zones in Local Plans</p> <p>HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information.</p> <p>We particularly recommend marking the zones associated with any MAHPs, and HSE advises</p> <p>that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.</p>	

Name	Comment	Council's Response
	<p>Identifying Compatible Development in Local Plans</p> <p>The guidance in HSE's Land Use Planning Methodology, available at http://www.hse.gov.uk/landuseplanning/methodology.pdf will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on Development Type Tables and the Decision Matrix are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones. There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of the Web App.</p> <p>Provision of Information to Interested Parties – Pipeline Operators</p> <p>The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter.</p> <p>If you have any questions about the content of this letter, please contact me at the address given in the letterhead.</p> <p>Yours faithfully</p> <p>John Moran - HM Specialist Inspector of Health and Safety (Risk Assessment)</p> <p>-----</p> <p>1- Amended by r.33 - Schedule 5 of The Planning (Hazardous Substances) Regulations 2015</p> <p>2 - Article 13(1) provides that Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in land use policies or other relevant policies. They shall pursue those objectives through controls on: (a) the siting of new establishments; (b) modifications to establishments covered by Article 11; and (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident</p> <p>3- Hazardous substances consents are granted by the Hazardous Substances Authority (HSA), which is usually the planning authority. The consent process is regulated by the HSA under The Planning (Hazardous Substances) Regulations 2015. The HSA must consult HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent, this map defines the consultation distance within which HSE must be consulted over any relevant future planning applications</p>	

Name	Comment	Council's Response
14 Lauren Laviniere (OPDC)	<p>Local Plan Partial Review (LPPR) Issues and Options Consultation</p> <p>Old Oak and Park Royal Development Corporation (OPDC) welcome the opportunity to comment on the Royal Borough of Kensington and Chelsea (RBKC) Local Plan Partial Review consultation.</p> <p>As you may be aware, OPDC was established in 2015 as a new functional body of the Greater London Authority, responsible for the planning and delivery of the UK's largest regeneration project. Centred on a new transport super-hub the size of Waterloo, OPDC's area is capable of delivering 25,500 homes and 65,000 jobs, making a significant contribution to London and the UK's economy and housing need. It is our task to ensure that this development opportunity creates a thriving new area in the city; somewhere people will aspire to live, work and play, and a destination people will return to visit time and time again.</p> <p>The Corporation is the local planning authority for parts of the London Boroughs of Brent, Ealing and Hammersmith and Fulham which make up the OPDC area; with responsibilities for preparing and maintaining a Local Plan or Development Plan . OPDC's powers also extend to determining planning applications, setting/collecting a Community Infrastructure Levy and facilitating neighbourhood planning.</p> <p>For your information, public consultation on OPDC's First Draft Local Plan is currently underway (from 4th February until 31st March 2016). The Draft Plan includes a Vision; Objectives; Preferred Policies and/or Policy Options; and further details on the capacity for new housing, jobs and wider regeneration. Further details on the consultation, including a copy of the Draft Local Plan and supporting studies, are available online at: opdc.commonplace.is. We welcome your views on our Draft Plan, and, to aid ongoing dialogue between our authorities, some general comments on RBKC's Local Plan Partial Review are set out below.</p> <p>The proximity of Old Oak and Park Royal to RBKC's boundary, and Kensal Canalside Opportunity Area/Place in particular, means it is especially important for our concurrent plan making activities to complement each other. OPDC's Local Plan explores opportunities to integrate Old Oak and Park Royal into the wider hinterland and secure better connectivity and permeability. Priorities and interventions are being developed for Places identified within our area at the same time that Places identified in RBKC's Local Plan, such as Kensal, are also be considered for review. In addition to this, OPDC's emerging Community Infrastructure Levy viability evidence will update data referred to in RBKC's Partial Review (i.e. the North Pole Depot and Kensal Gasworks Valuation). As a borough which has been involved in developing this evidence, we will keep RBKC informed of its progress. Given these issues, it is timely to engage with each other and, where appropriate, consider opportunities for joint working (i.e. on a detailed Masterplan).</p> <p>We note that RBKC need to identify additional sites through the Partial Review in order to meet identified development needs, and that a 'Call for Sites' has been issued to try to identify these. This approach is welcomed as it will ensure that, in the first instance, additional capacity to accommodate development is identified within RBKC's boundaries. OPDC is interested in knowing the outcome of this exercise so that we can consider and comment on any impacts for the OPDC area. For your information, the Corporation's Draft Local Plan and suite of supporting studies provide details on how development targets and infrastructure needs can be met within the OPDC area.</p>	<p>The Council is working closely with the OPDC to ensure that these sites are developed in a complementary way and sharing evidence documents where appropriate.</p>

Name	Comment	Council's Response

Question 3: The following potential new (strategic) site allocations have been identified: Royal Brompton Hospital/ Chelsea, Pembroke Road, Barlby and Treverton Estates, Silchester East and West, 39-49 Harrington Road.

Do you agree that any / all of these should be allocated in the future and do you have any comments on the draft indicative boundaries?

Name	Comment	Council's Response
1 Judith Blakeman	<p>The Visions and Policies for Westway and Latimer in the current Local Plan need updating.</p> <p>Suggested new Vision for Westway (the Latimer section) The Westway flyover will no longer be an oppressive negative influence, but one which celebrates arts and creativity and includes a major sports hub, using the land assets beneath and beside the flyover. Problems of community safety will have been overcome and improved pedestrian linkages will have made the area beneath the flyover welcoming. Wayfinding along the length of the undercroft from Ladbroke Grove to the Borough border will be clear and safe.</p> <p>Suggested new Policy for Westway (the Latimer section) The Council will ensure that some of the negative aspects of Westway are ameliorated through a range of measures that includes a comprehensive programme to "green" the whole area. The "high line and hanging gardens of Westway" will be a focal point that could attract many visitors.</p> <p>Suggested new Vision for Latimer Much of Latimer will have been rebuilt in a phased manner. Other parts will have been refurbished and improved. All members of the settled community will be guaranteed the opportunity of a new or refurbished home. There will be some capacity for new residents to move into the area.</p> <p>Latimer will be a place with a focus on the provision of high quality services through excellent architecture and urban design. Accessible and adaptable spaces will be valued and used by the local community and a significant amount of new public green space will improve the environment. The area will be better served by public transport, including a new Westway Circus station and step-free access at Latimer Road station. There will be a new neighbourhood shopping centre that meets local needs, and a well-developed creative industries hub at the Freston and Latimer Road Employment Zone.</p> <p>Suggested new Policy for Latimer The Council will ensure the long term renewal of Latimer by requiring only refurbishment and development that contributes positively to the area. It will resist development that does not permit the settled local community to be rehoused within the area or anything that undermines the role of the employment zone.</p>	<p>The Council is considering the case for regeneration of the Latimer area, this includes the option of continued maintenance. The vision for Latimer has been re-written to include the western part of the Westway and reflects these suggestions quite closely.</p>
2 TfL (Lee Campbell)	Site Allocations	The Council does not consider it

Name	Comment	Council's Response
	<p>TfL notes that the Local Plan (2015) only identified 'strategic sites' for Site Allocations. TfL considers that non-strategic sites should also be explicitly allocated for development in the draft plan. This will allow the Council to provide more detailed guidance for smaller sites that are 'development opportunities' and will also provide landowners with more certainty on the Council's position for development.</p> <p>TfL is the freeholder of land to the north western boundary of 'Silchester East and West', identified as a potential new strategic site allocation. We support the principle of the area's upgrade and request that TfL is involved in any future discussions for this site.</p>	<p>appropriate to allocate non-strategic sites. The Place chapters in the Local Plan provide more guidance on the how the Council seeks to guide development in the area.</p>
3 Kensington Society (Michael Bach)	<p>Chapter 4: Site Allocations: 4.4 Royal Brompton/Chelsea - this needs to be renamed Chelsea Medical Quarter</p>	<p>The site allocation is just for the Chelsea Farmers' market site and titled as such.</p>
3 Kensington Society (Michael Bach)	<p>Chapter 4: Site Allocations: 4.4 Royal Brompton/Chelsea - this needs to be renamed Chelsea Medical Quarter</p>	<p>As above</p>
4 Onslow Neighbourhood Association (Eva Skinner)	<p>Royal Brompton Hospital/Chelsea: the part of their site on Foulis Terrace currently provides accommodation for hospital staff. If that were sold off to provide residential houses, the loss of affordable dwelling to the borough would be significant, therefore this terrace should be removed from the 'New (strategic) site allocation.</p> <p>39-49 Harrington Road: as far as this Association is aware, this site is owned by the Iran, and they originally applied for an Iranian cultural centre to be built there. We are not aware that this site has changed from being an Iranian freehold. If it has changed, this Association has not been notified and we know of none of our residents who have said that they "are keen to see this prime South Kensington site redeveloped".</p> <p>This Association would want to be involved in any visions for the development of this site.</p>	<p>Foulis Terrace has not been allocated.</p> <p>This was a concern that had been relayed to the Planning Department some time ago, it is not repeated in the Local Plan. The site has been identified as a site allocation in the plan.</p>
5 Roy Burns	<p>I agree</p>	
6 John Eagle	<p>The Local Plan is so large a document that it is completely unreasonable to expect individual residents to wade through all of it to try to find the parts which affect them, and on which they would like to comment.</p> <p>I strongly suggest that the whole consultation process is deeply flawed</p>	<p>We are sorry you found the document too large but the Local Plan has to be produced to comply with planning legislation and guidance so there is no leeway.</p>
7 Jo Poole	<p>We understand that the (strategic) site allocation of Silchester East and West is seen by RBKC as a huge <u>regeneration target</u>. We believe that the existing well loved homes and the beautifully kept public green space and mature trees are an asset to the borough and the well established community, many of whom went through the 1960s "regeneration" and do not deserve to be disturbed as they near the end of their lives.</p> <p>The blue line in the case of Silchester appears to enclose the maximum amount of public green space and community sports facilities. This existing public asset should under no circumstances be sacrificed for development.</p>	<p>The Council is considering the case for regeneration of the Latimer area, this includes the option of continued maintenance</p>

Name	Comment	Council's Response
	<p>The buildings on Silchester East and West are well designed by the GLC architects and have endured well despite inconsistent maintenance. The towers have issues, especially with their lifts, but these should be addressed through care and maintenance, not by demolition. Extreme environmental damage would be wrought by the wholesale regeneration of Silchester, largely because of the solid concrete construction of the buildings and quantities of asbestos contained within them. Other buildings within the regeneration line, such as Charlotte Mews, Goodrich House and Whitchurch House are much newer than those on the main Silchester estates, are well maintained and have decades of life in them.</p> <p>Frinstead House (on Silchester West) is now enclosed by the MoreWest regeneration of the Silchester Garages, and has had no money or maintenance directed at it. The residents have endured years of noise, dust, temporary entrances and compromised security without compensation or apology. This must not happen again elsewhere. Buyers of the new MoreWest flats have been heard to ask when the tower block is coming down. These conflicting attitudes and expectations will build division and resentment through communities which were once peaceful and cohesive.</p>	
8 Christie's South Kensington (Francesca Filippini Pinto)	We very much welcome the redevelopment of the Harrington Road site. The site has the potential to become an attractive shopping and café/restaurant area, supporting the overall attractiveness of South Kensington as a cultural and leisure hub.	Noted, however allocation of this site is no guarantee that it will be developed.
9 The Royal Marsden NHS Foundation 34 Trust (Sunil Vyas)	<p>This consultation response is being made on behalf of the Royal Marsden NHS Foundation Trust. It relates to the proposed potential new site allocation for the Royal Brompton Hospital which is discussed in paragraphs 4.4.1 to 4.4.3 of the Council's LPPR document. It also relates to Figure 4.8 which shows the boundary of the potential new site allocation for the Royal Brompton Hospital.</p> <p>Given the interest expressed by many parties in support of the creation of a Medical Quarter in Chelsea through the consultation on the draft Royal Brompton Hospital SPD, the Royal Marsden supports the principle of identifying the joint estates of the Royal Brompton and the Royal Marsden as a site allocation. Both hospitals make an important contribution to healthcare and activity in the Royal Borough.</p> <p>The Royal Marsden recognizes the ongoing need for NHS Trusts to review and enhance the service it provides and part of this review includes assessment of its estate to ensure it meets current and future demands. However, the Royal Marsden has a concern that the proposed site allocation together with the cross references to the draft SPD, currently in abeyance pending the NHS England report, implies some endorsement of the Royal Brompton's proposals to dispose of the Fulham Road Wing for residential development.</p> <p>The Royal Marsden would like to remind the Council that it made an objection to this proposal along with a large number of objections from local residents and amenity groups. Assurances are sought that Council is not intending to put forward the Royal Brompton's development proposals, which are currently set out in the draft SPD, as part of this potential site allocation.</p> <p>With regard to the site boundaries shown on Figure 4.8, it is noted that the identified land includes the Royal Marsden's estate too. If this is intentional then it is important that the references in the text recognize that the land shown is in two separate ownerships. It could be referred to as the Chelsea Medical Quarter (Royal Brompton/Royal Marsden) to make it clear that there is more than one</p>	The site being allocated is just the Chelsea Farmers' Market, the draft SPD will not be adopted.

Name	Comment	Council's Response
	<p>landowner.</p> <p>The Royal Marsden would also like the Council's assurance that any site allocation would not override the consideration of policy CK1 which seeks to protect the loss of social and community uses. The Royal Marsden considers that it is imperative that the Fulham Road Wing remains in health care use. There is a proven need for the expansion of the services offered by the Royal Marsden in Chelsea.</p> <p>The Fulham Road Wing represents a 'once in a lifetime' opportunity to achieve this. The Royal Marsden would like to request a meeting with Council officers in order that it can reassured of the Council's intentions.</p>	
10 Royal Brompton & Harefield NHS Foundation Trust (RBHT)	Yes. Support the inclusion of Royal Brompton Hospital on Sydney Street and the inclusion of 117-125 Sydney Street as defined by Royal Brompton and Harefield NHS Foundation Trust responses to the Call for Sites consultation and enclosed plans.	The site submitted is already in hospital use and does not require a site allocation.
11 Silchester Residents Association (Jo Poole)	<p>The document is very negative in its description of the quality and design of the post-war housing estates in the area. The reality is much more mixed – contrary to the suggestion that housing is of poor quality, and many estates provide a very good quality of life.</p> <p>On Silchester, the high-rise buildings are the most poorly maintained but also the hardest to regenerate. We must not confuse poor maintenance with poor design. This is a crucial point to understand, not just in the present circumstances but also for the future where any new stock, if not properly maintained, will simply repeat the hardships experienced by current tenants. Given the current dire financial circumstances facing many local authorities it is alarming to find that the local plan is silent how the council plans to fund the maintenance of future housing stock.</p> <p>Silchester East and West have a well established community living in well designed buildings which are far from their end of life. It is not appropriate to designate the area as a strategic site where the default position would be that all existing buildings and green space would be completely rebuilt. Buildings and green space should be protected and assessed to ensure they meet resident's requirements. They are likely to reach end of life one at a time and a more sympathetic regeneration can then be undertaken that serves the community's needs.</p> <p>It seems completely perverse that on the one hand the Council cites life expectancy and health as justification for regeneration yet on the other openly admits that regeneration would dramatically increase housing density and drastically reduce the amount of open green space currently enjoyed by residents on the Silchester Estate. The proposals are also silent on how exposing a significantly increased population to detrimental pollutants such as nitrogen dioxide from the Westway Flyover would help create a healthier community.</p>	<p>The Council is considering the case for regeneration of the Latimer area, this includes the option of continued maintenance. However, maintenance is not an issue that can be covered in a planning document. Densification is the only way that a fully developed borough like RBKC can create more homes. A distinction needs to be drawn between well designed useable space and 'left over' land that is often a feature of high rise, although not necessarily high density, development.</p>
12 Judith Blakeman	<p>Silchester East and West</p> <p>The Council's Housing Revenue Account Business Plan indicates that plans to redevelop Silchester East and West are further advanced than is suggested in this consultation document. Residents of this area also suspect that the blue line indicative boundary will shortly be re-drawn to include at least a part of the Lancaster West Estate – and then maybe beyond.</p>	<p>The Council is considering the case for regeneration of the Latimer area, this includes the option of continued maintenance. The site allocation allows for the</p>

Name	Comment	Council's Response
	<p>Residents of this community cannot stress too strongly the need to retain all the settled residents of this area in the immediate locality. They also stress the need to retain and increase the amount of green space in view of the poor air quality that is exacerbated by the Westway motorway and the railway line. Their preference is for the refurbishment of existing buildings rather than demolition.</p> <p>As stated on Page 63, a site has already been identified to develop around 32 new residential units on the KALC site for intermediate rent and there is scope also for additional "hidden homes" and "in-fill homes" to be developed around and about the land owned by the Council and other social landlords within the Silchester and Latimer areas.</p> <p>While we agree that some of our Council housing stock requires replacement, most only requires refurbishment and better and more regular maintenance. Wantonly destroying existing homes and their associated green space is not compatible with the Mayor's objective of London becoming a world leader in improving the environment.</p> <p>The poorer health in North Kensington derives not from the social housing stock, poor or otherwise, but from the fact that for many years only people with specific physical and mental ill-health needs have had access to social housing. A greater provision of price-accessible housing for people not eligible for social housing will reduce North Kensington's poorer health indices. Removing many of the current population and replacing them with more affluent residents will of course also improve ill health indices, but this is an iniquitous way of addressing poorer health in North Kensington.</p>	<p>possibility of regeneration in the area. Densification is the only way that a fully developed borough like RBKC can create more homes. A distinction needs to be drawn between well designed useable space and 'left over' land that is often a feature of high rise, although not necessarily high density, development.</p> <p>Comment on poor health noted.</p>
<p>13 The Institute of Cancer Research (Steven Surridge)</p>	<p>RBKC Local Plan Partial Review- Issues and Options Consultation Representations on behalf of The Institute of Cancer Research, London</p> <p>I am writing on behalf of The Institute of Cancer Research (ICR) in respect of the planning consultation regarding the Local Plan Partial Review Issues and Options consultation from 15 December 2015 to 9 February 2016. It specifically relates to the proposed new site allocation for the Royal Brompton Hospital sites, which is discussed in paragraphs 4.4.1 to 4.4.3 and Figure 4.8 of the Council's consultation document. In preparing this letter we have reviewed the Local Plan Partial Review - Issues and Options as well as the various supporting documents.</p> <p>Background</p> <p>From its foundation in 1909, the ICR has grown to become one of the world's foremost independent cancer research organisations. The ICR works closely in partnership with The Royal Marsden NHS Foundation Trust and is broadly split over two locations in London, which are in Chelsea and Sutton.</p> <p>In Chelsea the ICR is currently based at two sites, including 123 Old Brompton Road and 237 Fulham Road which is located to the west of and immediately adjacent to The Fulham Wing. The Fulham Wing is an existing building owned and in use by the Royal Brompton Hospital. The ICR's clinical partner, The Royal Marsden operates from a hospital building on the Fulham Road to the east of The Fulham Wing (separated only by Dovehouse Street). The Fulham Wing sits neatly in between the existing sites of the ICR and The Royal Marsden, presenting both neighbours with a once in a lifetime opportunity to secure the Fulham Wing for continued hospital and research purposes.</p> <p>There are over 225 clinicians and scientists based at the ICR's Chelsea laboratories. The Divisions and Units operating in the laboratories include the recently launched Tumour Profiling Unit designed to accelerate moves towards individualised cancer</p>	<p>The Council welcomes engagement with the ICR. The only site which is being allocated is the Chelsea Farmers' Market.</p>

Name	Comment	Council's Response
	<p>treatment. The divisions of Molecular Pathology, Cancer Biology, Breast Cancer Research and Structural Biology also operate from the same site. The ICR works tirelessly to analyse the processes that drive the development, growth and spread of cancers, discovering cancer treatments that save the lives of cancer patients in the Borough, across the UK and worldwide.</p> <p>In order to support the continued growth and development of the ICR additional capacity is needed for research and development related uses to accommodate new cancer research facilities. This is important on not only a national scale, but also internationally as the ICR and The Royal Marsden work together to form one of the top four centres for cancer research and treatment globally. The ICR is also a College of the University of London, and one of the world's leading cancer research organisations. It generates more invention income on a per capita basis than any other academic organisation in the UK. The ICR is ranked as the UK's leading academic research centre, and leads the world at isolating cancer-related genes and discovering new targeted cancer drugs.</p> <p>In this context I am sure you will agree that, together with the Royal Marsden Hospital, the ICR is an important stakeholder in the consideration of the future of the Royal Brompton Hospital estate and the Local Plan partial review. It is imperative, therefore, that due regard is given to the ICR's interests.</p> <p>Comments on the Local Plan Partial Review Issues and Options</p> <p>In light of the interest expressed by many parties in support of the creation of a Medical Hub in Chelsea through the consultation on the draft Royal Brompton Hospital SPD (2014), the ICR supports the principle of identifying the joint estates of the Royal Brompton and the Royal Marsden as a site allocation. Both hospitals, and the ICR, make an important contribution to activity in the Royal Borough.</p> <p>Notwithstanding this, the ICR is concerned by the suggestion in the Issues and Options document (paragraph 4.4.2) that the Royal Brompton sites may be allocated for alternative uses. This is in addition to the cross references to the Royal Brompton Hospital SPD, currently in abeyance pending the NHS England report, which implies endorsement of the Royal Brompton's proposals to dispose of the Fulham Road Wing for residential development. The ICR made a strong objection to this proposal along with a large number of objections from local residents and amenity groups. Assurances are, therefore, required that Council is not intending to take forward the Royal Brompton's proposals, which are currently set out in the previous draft SPD, as part of this potential site allocation.</p> <p>The ICR also seeks the Council's assurance that any site allocation of the Brompton Hospital sites for alternative uses would not override the consideration of current Core Strategy Policy CKI which seeks to protect the loss of social and community uses.</p> <p>Conformity with the National Planning Policy Framework</p> <p>Paragraph 14 of the National Planning Policy Framework (NPPF) sets out guidance on how the 'presumption in favour of sustainable development' is to be implemented in plan-making and decision-taking. With regard to 'plan-making' it advises local planning authorities to 'positively seek opportunities to meet the development needs of their area'. The ICR therefore requests that the Council considers the development needs of the ICR and the Royal Marsden in forming its judgment about the implementation of policy CKI with reference to any development allocations for the Royal Brompton Hospital sites and the Fulham Wing in particular.</p> <p>Paragraph 17 of the NPPF sets out 12 core planning principles that should underpin both plan-making and decision-taking. The final principle is that planning should:</p> <p>'take account of and support local strategies to improve health, social and cultural well being for all, and deliver sufficient</p>	

Name	Comment	Council's Response
	<p>community and cultural facilities and services to meet local needs.'</p> <p>Furthermore, paragraph 70 of the NPPF relates to promoting healthy communities and provides guidance on how planning policies and decisions can deliver social, recreational and cultural facilities the community needs. The provisions in this paragraph, which are of particular relevance, are that local planning authorities should:</p> <p>"plan positively for the provision and use of....local services to enhance the sustainability of communities and residential environments guard against the unnecessary loss of valued facilities and services...</p> <p>ensure an integrated approach to considering the location of housing, economic uses and community facilities and uses."</p> <p>The ICR therefore requests that the Council has regard to the above national planning policy in preparing its Local Plan partial review.</p> <p>Conformity with National Planning Policy Guidance</p> <p>In addition the ICR highlights that paragraph 171 of National Planning Policy Guidance states:</p> <p>"Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being."</p> <p>Accordingly it is the ICR's view that the proposed allocation of the Royal; Brompton Hospital sites for alternative uses is premature at this stage, and while the outcome of the NHS England Review is still taking place.</p> <p>Conformity with the London Plan</p> <p>The ICR is aware of the strategic aims of the Greater London Authority in promoting the continued role of London as a national and international centre of medical excellence and specialised facilities, promoting expansion where appropriate.</p> <p>London Plan Policy 3.16 (Protection and enhancement of social infrastructure in the London Plan) provides some clear requirements for London boroughs to take into account when making planning decisions in respect of redundant social infrastructure premises:-</p> <p>"8....The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.."</p> <p>Policy 3.16 sets out how boroughs should address the need to deliver social infrastructure and meet community needs during LDF preparation:-</p> <p>"0 LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:</p> <p>a) for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and</p> <p>b) to secure sites for future provision or reorganisation of provision...'</p> <p>'E ...If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses for which needs have been identified....."</p> <p>London Plan Policy 3.17 Health and Social Care Facilities states:</p> <p>"D In LDFs boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from joint strategic needs assessments.</p> <p>E Boroughs should work with the NHS, social care services and community organisations to:</p> <ol style="list-style-type: none"> 1. regularly assess the need for health and social care facilities at the local and sub-regional/eve/; and 2. b) secure sites and buildings for or to contribute to future provision. <p>F Boroughs should promote the continued role and enhancement of London as a national and international centre of medical</p>	

Name	Comment	Council's Response
	<p>excellence and specialised facilities".</p> <p>The ICR, however, is concerned that the potential allocation of the Royal Brompton Hospital for alternative uses would mean these objectives are not met. This is particularly apparent in respect of the ICR's requirement to find additional accommodation to expand its research and development facilities within the Royal Borough of Kensington and Chelsea.</p> <p>The role of London as a centre for clinical, training and research excellence in terms of supporting the ICR and the Royal Marsden would therefore be diminished if the Council gives priority to residential development at the Brompton Hospital Sites and the Fulham Wing in particular which is adjacent to both institutions. Accordingly it is the ICR's view that the Local Plan Partial Review should have regard to the London Plan and also reflect a strategic assessment of needs.</p> <p>The Fulham Wing</p> <p>The ICR has a unique partnership with The Royal Marsden that allows them to create and deliver results in a way that other institutions cannot. Any allocation of the the Fulham Wing for alternative uses, such as residential use, would severely curtail the ability of the ICR to expand and this will inevitably impact on the opportunities to develop further research and clinical trials. As an example, the demand for space at 237 Fulham Road has made the recruitment of senior researchers incredibly difficult as they are typically accompanied by much larger research groups. The ICR also has grave concerns that their Career Development Faculty will not be able to grow and expand and there will also be a detrimental impact on the translational research teams. All of the research undertaken by these teams is vital to the success of the ICR and their commitment to improving the lives of cancer patients.</p> <p>Whilst the ICR supports the Royal Brompton Hospital's wish to consolidate and expand its existing facilities, the ICR itself has a growth agenda with many of its employees being from the local community. The Chelsea sites are, nevertheless, severely constrained. The protection of the Fulham Wing for continued healthcare use would be of immense benefit to the ICR. The Local Plan Partial Review should take account of these strategic needs in order to protect other existing social and community providers, such as the ICR and the Royal Marsden, within the Borough.</p> <p>Dudmaston Mews</p> <p>A major concern for the ICR is the potential allocation of Dudmaston Mews for alternative uses, as indicated on Figure 4.8 of the Local Plan Partial Review document. In this context it should be noted that Dudmaston Mews is used heavily by the ICR on a daily basis in order to provide access for the following:</p> <ol style="list-style-type: none"> 1. emergency vehicles; 2. deliveries for office uses including stationary supplies; 3. deliveries for research purposes including liquid nitrogen, chemicals, medical gases and scientific equipment; 4. staff cycle access; 5. maintenance access including cranes for mechanical and electrical engineering services; 6. temporary generators whilst testing of electrical services is completed; and waste collection including the use of skips and the collection of clinical waste. <p>Any option to make this area less of a service road or to restrict its use in any way, including during construction, and to allow access for alternative/residential uses must factor in that this is a principle access route used by the ICR for deliveries. Without unrestricted access</p>	

Name	Comment	Council's Response
	<p>the ICR would be unable to function. This option, therefore, needs to be excluded without delay.</p> <p>Summary</p> <p>We request that we be kept informed of progress in respect of the Local Plan Partial Review and any further planning policy documents. In addition we reserve our clients' position to submit further representations on subsequent consultations.</p> <p>I trust this provides the information you require at this stage. Please do not hesitate to contact me in the meantime if you have any queries.</p>	
14 ESSA (Anthony Walker)	<p>Other areas. We consider that, under new site allocations, (37 Pembroke Road paragraph 4.4.4) attention should be given to this as an area requiring comprehensive consideration to make sure that the opportunity for redevelopment to regenerate this end of Pembroke Road as well as the western face of Warwick Road is used to maximum advantage. If the two sites identified at present are each considered in isolation the opportunity for wider regeneration and integration into the neighbouring environment will be lost. Unlike the western side of Warwick Road which is almost an isolated area, the eastern side is closely related to Warwick Gardens and Pembroke Road. It forms a conclusion when viewed along Pembroke Gardens from the ESSA conservation area. We understand that consideration is still underway as to the extent to which the waste depot facilities need to be retained on site and we are concerned that unless a more holistic view of the sites is taken within the community, it may result in a development which remains divided from that community in which it is located.</p>	The Council agrees that a comprehensive approach should be adopted.
15 Thames Water Utilities Ltd (Mark Mathews)	<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012.</p> <p>Thames Water support the Local Plan Review and particularly the strong emphasis on policies to address flood risk within the Borough. With regard to the proposed review Thames Water have the following comments to make on the proposals and questions raised.</p> <p>Site Specific Comments</p> <p>Thames Water has the following comments to make on the potential new site allocations set out under Section 4.4 of the Issues and Options consultation document:</p> <p>Royal Brompton Hospital / Chelsea</p> <p>New development needs to address surface water to reduce the peak flow into the combined sewer network such that surface water discharge into the network is restricted to greenfield run-off rates.</p> <p>Pembroke Road</p> <p>New development needs to address surface water to reduce peak flow into the combined sewer network such that surface water discharge into the network is restricted to greenfield run-off rates. It should also be noted that the existing Counters Creek sewer passes underneath Warwick Road in this location.</p> <p>Barbly and Treverton Estates</p> <p>New development needs to address surface water to reduce peak flow into the combined sewer network such that surface water</p>	Comments noted, they have been included as part of all current site allocations in the draft Local Plan.

Name	Comment	Council's Response
	<p>discharge into the network is restricted to greenfield run-off rates.</p> <p>Silchester East and West New development needs to address surface water to reduce peak flow into the combined sewer network such that surface water discharge into the network is restricted to greenfield run-off rates. It should also be noted that the existing Counters Creek sewer passes underneath Freston Road in this location.</p> <p>39-49 Harrington Road New development needs to address surface water to reduce peak flow into the combined sewer network such that surface water discharge into the network is restricted to greenfield run-off rates.</p>	

Question 4: Are there any other (strategic) sites that should be considered as a site allocation as part of the Local Plan Partial Review? If so, please complete the Call for Sites section of the Consultation Response Form

Name	Comment	Council's Response
1 Charles Bezoari Elder	Olympia.	Olympia is located in LB Hammersmith and Fulham
2 Roy Burns	Pelham Street	It is unclear what this comment relates to.
3 John Eagle	<p>The Local Plan is so large a document that it is completely unreasonable to expect individual residents to wade through all of it to try to find the parts which affect them, and on which they would like to comment.</p> <p>I strongly suggest that the whole consultation process is deeply flawed</p>	We are sorry you found the document too large but the Local Plan has to be produced to comply with planning legislation and guidance so there is no leeway.
4 Savills (Aimee Squires)	<p>In response to Question 4, we formally submit the site at 100A West Cromwell Road for consideration as a site allocation. We believe that 100A West Cromwell Road should be included as a site allocation to allow for the comprehensive redevelopment of the site at 100 and 100A West Cromwell Road. 100A West Cromwell Road has the potential to deliver up to 250 new dwellings. Together, the sites (100 and 100A West Cromwell Road) have the potential to deliver 600 to 650 new dwellings.</p> <p>This would greatly assist the Borough to deliver their housing targets over the Plan period. Given the constraints posed throughout the Borough (i.e. the number of listed buildings and conservation areas) and the relatively low supply of land, a development of 600 to 650 residential units at the site (100 and 100A West Cromwell Road) would be a significant contribution to the provision of additional residential dwellings. The site has the potential to accommodate this quantum of development given its strategic position along two major transit corridors, excellent public transport connections and proximity to central London. It is also one of the few large sites within the Borough which are not located within a Conservation Area.</p>	100A has been added to the Strategic Site allocation for the Warwick Road sites.

Name	Comment	Council's Response
	<p>The site is put forward by the landowner, and there are no land ownership issues which would prohibit the site coming forward for development in the medium to long term. The proposed allocation of the site would enable the following land uses and benefits to be delivered –</p> <ul style="list-style-type: none"> · Provision of 600 to 650 residential units (100 and 100A West Cromwell Road) and a significant contribution towards the Borough's housing targets; · Provision of a suitable dwellings mix in line with the Borough's strategic housing targets; · Subject to viability, the provision of affordable housing or a contribution towards the provision of affordable housing elsewhere in the Borough; · Re-establishment of the existing retail provision; · Provision of new community use floorspace in accordance with the previous strategic site allocation; · Substantially improved and consistent public realm along the West Cromwell and Warwick Road frontages; · Connected urban spaces throughout the site; · An active interface with the surrounding streets; · Potential for pedestrian connectivity improvements throughout and around to the site. <p>We believe these benefits would largely enhance this part of the Earl's Court area.</p>	
5 Bilfinger GVA (Thomas Edmunds)	<p>REPRESENTATION ON BEHALF OF NOTTING HILL GATE KCS LIMITED</p> <p>We write on behalf of our client, Notting Hill Gate KCS Limited, to set out our response to the Local Plan Partial Review Issues and Options consultation document (Dec 2015), and to set out broader commentary on approach to the policies being considered as part of this review.</p> <p>Introduction</p> <p>Notting Hill Gate KCS Limited [hereafter referred to as the owner], owns the properties at Newcombe House, 43/45 Notting Hill Gate, 39/41 Notting Hill Gate, and 161-237 Kensington Church Street (odd).</p> <p>Following extensive pre-application engagement from 2012 the owner submitted a planning application in November 2015 for the comprehensive redevelopment of the site. The mixed use development includes the provision of new public realm, offices, residential, a new surgery, and the opportunity to deliver a step-free access route from the ticket hall to the inner rail of the District & Circle line platform (eastern side) at Notting Hill Gate station.</p> <p>In addition to the extensive pre-application consultation with the Royal Borough of Kensington and Chelsea and other key stakeholders (including Ward Councillors, the Greater London Authority, Kensington Society, Ladbroke Association, Campden Hill Residents, Pembridge Association, Norland Conservation Society, the Cherry Tree Residents Amenity Association, and the Notting Hill Gate Improvement Group), the owner has also fully participated in the consultation process in preparing new planning policies or Supplementary Planning Documents over the previous years, including the Notting Hill Gate SPD through their membership of the Notting Hill Gate Liaison Group.</p> <p>It is a generational opportunity to enhance the existing area with a high quality mixed use development that is sympathetic to and</p>	The Notting Hill Gate SPD sets the context for Notting Hill Gate.

Name	Comment	Council's Response
	<p>appropriate for its setting. The planning application proposals seek to regenerate Notting Hill Gate by replacing an eyesore building with a new urban quarter which provides architecture of the highest quality, which is contextual as well as being contemporary, and also provides a public realm which is accessible, functional, robust and a delight. The proposed uses – flexible office accommodation, much needed homes, local independent shops / restaurants, step free access to the District & Circle Line eastern platform and a new GP's surgery – are what is wanted and required in the area.</p> <p>It is in this context that these representations have been submitted.</p> <p>Approach to policy formulation There is a need to ensure policies are not overly restrictive, which may prevent opportunities for appropriate development to come forward. The policy framework within a Development Plans should be deliverable, and development needs to be economically viable. Plans should be flexible in order to recognise the benefits development proposals can deliver – wider planning benefits, public benefits, or both.</p> <p>There will continue to be the need to assess development proposals on a site by site basis, and any policies drafted to include specific assessment criteria should seek to maintain a 'rule of thumb' approach to guide development and to ensure flexibility, as opposed to enforcing prescriptive standards that could prejudice development.</p> <p>At the heart of the NPPF is the Presumption in Favour of Sustainable Development, and the need to ensure Plans are deliverable and to facilitate development through the economic cycle. Inflexibility and broad policy application doesn't allow for individual circumstance or site context. The NPPF advises how "policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances" (para.21 3rd bullet).</p> <p>We note that the proposed new wording to policies isn't included for comment at this stage, but rather broad options are presented and comment is invited. We therefore welcome the flexibility presented by this initial 'Issues and Options' stage of consultation, and will be making representations in due course as specific policies are drafted.</p> <p>As set out above, the thrust of this representation – in the context of the Newcombe House site and the owner's experience – is to enshrine flexibility in the wording of future policies as they are drafted, in order to facilitate the delivery of sustainable development and deliver the objectives of the Plan, and to avoid inflexible and restrictive policies that prevent the most appropriate developments coming forward.</p> <p>We do not provide comment on every question throughout the document, focusing instead on a general approach to how the policies should be drafted in the future and, in the context of Newcombe House, we will focus some specific comments on the following areas:</p>	
6 St Quintin and Woodlands Neighbourhood Forum (Henry Peterson)	<p>Section 4 Site Allocations: 4.1 The StQW Forum has no detailed comments on progress on strategic sites, other than for the Kensal gasworks covered above. Nor do we have further 'strategic sites' to propose. 4.2 It would seem sensible for an updated CLP to include updates on what has happened/not happened on the existing strategic sites.</p>	<p>The strategic site allocations have been updated. Strategic site housing allocations</p>

Name	Comment	Council's Response
	<p>4.4 Given the call for sites, for both housing and business/enterprise, the CLP needs to make clear what defines a 'strategic' site and whether this label has policy or statutory implications? What is the difference between a 'strategic' site as opposed to a 'large' site as defined in relation to RBKC CL7? Does the Council have a view on whether or not neighbourhood areas can or should include 'strategic sites'. What is the relationship with 'excluded development' as defined in planning legislation and relevant to neighbourhood plans?</p>	<p>count towards achieving London Plan housing targets for the borough. Smaller sites are treated as windfalls and a broad assumption is made about the number of windfall homes that will be achieved each year. Strategic sites are the ones that the Council relies upon to meet its housing targets, and are like other strategic matters something the Council has a 'duty to cooperate' with other boroughs. By their nature strategic sites require consideration of strategic issues like infrastructure requirements. Neighbourhood plans must be in general conformity with the strategic policies of the local authority, this includes strategic site allocations.</p> <p>Policy CL7 relates to basements, exceptions to the policy may be made for large sites these are defined in 34.3.56 of the Local Plan as 'new developments located in a commercial setting or of the size of an entire or substantial part of an urban block'. There is no direct link between large sites in this context and strategic sites. Strategic sites are likely to be large sites in relation to CL7 but not all sites that are exceptions to CL7 will be strategic sites.</p> <p>Excluded development is defined in section 61K of the Town and</p>

Name	Comment	Council's Response
		Country Planning Act 1990 (as amended), e.g. mining and nationally significant infrastructure projects.

Call for Sites: Sites Submitted

Submitted by	Site and Proposed Use	Council Comment
Judd Planning (John Osborn)	<p>Land to the West of Highlever Road (Formerly Clifton Nurseries), Nursery Lane, London, W10, 6QD</p> <p>Between 10 and 14 dwellings</p>	<p>Not a reasonable alternative</p> <p>The site has been identified as 'Local Green Space' in the draft Neighbourhood Plan. This Plan has passed examination and referendum and will shortly form part of the Council Local Development plan.</p>
Chris Ball – Savills	<p>92 Lots Road</p> <p>Serviced apartments that would provide complementary short stay accommodation to support employment generation in the area.</p> <ul style="list-style-type: none"> - A private hospital to add to the areas health facilities. - Short stay medical hotel services, providing short-term recovery accommodation, contributing to the areas social and community facilities. - Serviced retirement apartments that would make a significant contribution to providing accommodation to the Royal Borough's ageing population. - Affordable housing and / or a mixed use development site offering both residential and commercial floor space. 	<p>Not reasonable alternative</p> <p>The consultee suggests that 92 Lots Road does not have a long term future as a premises that can provide employment space' and that as such the property would be better suited to a range of alternative uses.</p> <p>The Council does not concur with this view. As an employment use within an employment zone there is a presumption that it must be retained. The introduction of some higher value uses may be appropriate when they can be shown as being necessary to enable the continued business use on the rest of the site. This will be assessed on a case by case basis as and when an application is made.</p> <p>The applicant proposes a number of possible alternative use, none of which would ordinary be suitable within an Employment Zone. As such it would not be appropriate to allocate the property for any of the proposed uses.</p>
St Quintin and Woodlands Neighbourhood Forum - Henry Peterson	<p>142a Highlever Road St Quintin Garage</p> <p>It is considered that the site could accommodate 6-10 housing units (1-2 bed)</p>	<p>Not reasonable alternative</p> <p>The Council recognises that the referendum version of the SQWNP includes allocations for the sites 1-14 Latimer Road and 142A Highlever Road. The SQWNP is in itself part of the Borough's development plan, and as such it would not be appropriate to repeat the allocation.</p>
Chelsfield LLP - Sarah Waller	<p>Former Knightsbridge Fire Station</p>	<p>Not reasonable alternative</p> <p>The site has been identified within Chapter 14 of the CLP as being a "potential development site" (Para 14.4.3) "suitable for comparison retailing". This reflects the site's position close to the Knightsbridge International Centre.</p> <p>The site has been considered as part of a pre-application in 2014 (AR/14/00927) in which officers were of the opinion that a change of use to a class A1 retail use could be supported were the loss of the social and</p>

		<p>community floorspace be accommodated elsewhere.</p> <p>Any loss of social and community uses would have to be addressed against the sequential test set out in CLP CK1. There would be no “in principle” objection to the creation of A1 or B class uses on this site were the social and commit use sequential test met. The applicants have yet to have demonstrated that this is the case.</p> <p>It would not be appropriate to allocate the site for non social and community uses until the requirements of the sequential test have been addressed.</p>
Chris Beard acting on behalf of Royal Brompton & Harefield NHS Foundation Trust (RBHT)	<p>Royal Brompton Hospital Site</p> <p>Sydney Street, London, SW3 6PY</p> <p>Medical use</p>	This site came in for a medical use. The Royal Brompton Hospital is already in medical use so there is no need for an allocation. However, the Brompton Hospital site at Chelsea Farmers’ Market has been allocated for Housing.
Lee Campbell – TfL	<p>South Kensington Station including Pelham Street and Thurloe Street.</p>	This site has a number of complex constraints. It is within the setting of a listed building. The site is narrow and immediately adjacent to the tube line. These constraints have implications for design and residential amenity. The site may have the potential to provide some residential units but further analysis is required. TfL have indicated that they are commissioning a feasibility study later in the year. At this stage, given the complex issues associated with the site, it is considered more appropriate to deal with development at South Kensington Station through pre-application discussions and a planning application after more information is available rather than via a site allocation without all the evidence.
49 Savills (Aimee Squires)	<p>100A West Cromwell Road</p> <p>Residential with the potential to bring forward a number of other planning benefits including community facilities, improved public realm and new urban spaces. The site would also re-provide retail floorspace as per the existing site</p>	This has been allocated for development within the draft policies.