

CED013

Local Plan Partial Review – Examination Matters, Issues and Questions Hearing Statement

Matter 2: Spatial Strategy
Issue 2b: Estate Regeneration (Policy CH5,
Chapter 7 and Site Allocations CA2, CA5 and CA8)

February 2018



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Matter 2 – Spatial Strategy

Issue 2b: Estate Regeneration (Policy CH5, Chapter 7 and Site Allocations CA2, CA5 and CA8)

1. **What bearing does the Council's proposal to suspend estate regeneration projects in the borough have on the overall vision and spatial strategy for Kensington and Chelsea?**
 - 1.1 The Council's proposal to suspend estate regeneration projects in the Borough is a direct response to the Grenfell Tower tragedy of June 2017. In response to criticism of the Council, both in actions leading up to the fire and its response afterwards the new Leader of the Council, Elizabeth Campbell wanted to reassure communities in the Borough that their views would be listened to more carefully and acted upon and that residents on the estates, would, with assistance, be involved in any co-designed plans that were brought forward. Whilst estate regeneration plans were at an early stage of their development and the Council had not determined what level of development (if any) was appropriate on the estates in question it was acknowledged it would not be appropriate to proceed. The estates regeneration projects were a single component of new housing delivery in the Borough and as such their suspension has no effect on the overall vision and spatial strategy. The vision is concerned with what the Council would like the Borough to be in 2028 and how we might get there, it is by its very nature high level and comprehensive.
 - 1.2 The overall strategic commitment is to further develop the strong and varied sense of place in the Borough and to do this in partnership with other organisations, and more importantly, our residents. The need to do this is now stronger than it ever was with the ongoing need to put our residents at the heart of everything that we do. In terms of stimulating regeneration across the Borough and in areas of change the vision outlines the desire for better transport, better housing and better facilities, aiding better health. For the avoidance of doubt regeneration can take many forms and does not necessarily involve large projects such as complete redevelopment/. It can involve changes of different scale and with different impacts, depending on the needs of local communities and the character of the area. Often regeneration will take the form of incremental improvements over a number of years, involving a range of projects and initiatives, such as providing affordable workspace, creating more accessible and welcoming public realm, or investing in training and employment opportunities for local residents.
 - 1.3 The suspension of estate regeneration projects across the Borough does not change the vision and spatial strategy. If anything it is strengthened. The prime strategic objective of boosting housing delivery so that a significant quantum of new homes will have been built, both market and affordable to address housing need remains of great importance to the

Council. The aftermath of the Grenfell fire highlighted the need for more affordable homes and the vision contributes to these being delivered. However, this should not be interpreted as having to rely on large scale estate regeneration projects. There are many other forms of smaller scale residential development which will be actively considered.

1.4 The Council remains committed to the three strands of the vision which are to stimulate regeneration across the Borough and in areas of change, to enhance the reputation of our national and international destinations and to uphold our residential quality of life. These do not change as a result of the termination of estate regeneration projects. The outcome of the suspension is to provide some alternatives for housing delivery, but given the strategic objective to provide a diversity of housing to boost housing supply this is entirely in line with the objective and the wider strategy of the Plan.

2. Is the proposal to delete Policy CH5 and Site Allocations CA2 (Barlby – Treverton), CA5 (Silchester Estates) and CA8 (Warwick Road Estate) and the whole of chapter 7 (Latimer) and address these areas of the borough in the early review of the Local Plan justified as the most appropriate strategy for the RBKCLPPR?

2.1 Given the commitment from the new Leader of the Council, in July 2017 in the aftermath of the Grenfell Tower tragedy that the culture of the Council will change and in practical terms this means creating a future for the Borough together with residents, it was considered entirely appropriate to recommend deleting the draft estate regeneration policy, removing the three site allocations for the Silchester estate, the Warwick Road estate and the Barlby – Treverton estate and the Latimer Place chapter which included the wider area around the Grenfell Tower. The new Leader, Elizabeth Campbell, made it clear that all plans for regeneration in the Borough would be rethought and the Council would work with residents to create new plans where residents could vote on the results. Although the Latimer Place composed of a high level vision and contained much of relevance to the area in terms of priorities it would not have been appropriate to carry this forward. There will be different priorities and views from residents and the wider community about how regeneration in the wider area around the Grenfell tower should be taken forward, especially after the fire tragedy and time and thought is required to ensure that it is undertaken in a sensitive and inclusive way.

2.2 As stated previously, the estate regeneration proposals were at an early stage in their development. At the time of submission of the LPPR (May 2017) the Council, as landowner, had not yet determined what level of development (if any) was appropriate on any of the sites. The three site allocations which are now recommended to be deleted were at the stage identified in the NPPF for the development plan system to identify land which might be developable to assist in meeting the Borough's housing need (NPPF paragraph 47). As such no specific quantum of housing was being relied upon to meet the Council's first five years of housing

supply. The allocations themselves were expressed as 'up to' rather than 'a minimum of' and it was clear in the principles that a decision had to be taken to process with large scale redevelopment rather than infill/refurbishment or continued maintenance. The decision to remove them will still enable the draft Plan to be found sound and legally compliant. The principles for the Silchester Estates policy (CA5) also required the Council to seek to work with landowners, existing residents and other stakeholders in the area to develop a comprehensive masterplan for the whole area. If such a masterplan did come forward it would have to be prepared along the lines of that already described. It would be inappropriate to come forward otherwise.

- 2.3 The proposal to delete Policy CH5 and Site Allocations CA2 (Barlby – Treverton), CA5 (Silchester Estates) and CA8 (Warwick Road Estate) and the whole of chapter 7 (Latimer) and address these areas of the Borough in the early review of the Local Plan is clearly justified as the most appropriate strategy for the RBKCLPPR. The commitment to an early review will enable a thorough and comprehensive study of other smaller scale housing sites to be conducted and for regeneration schemes of a possibly a wider scale to be explored with residents and the communities affected. There are no proposals at present as to how this might happen and what mechanisms might be used but an early review would enable such issues to be addressed. The vision as to what the Borough might look like in 2028 remains intact and the commitment to uphold our residential quality of life so that it will be improved for everyone is as important now as it was before the Grenfell fire tragedy.

3. Would the vision and spatial strategy remain robust, effective, in general conformity with the London Plan and consistent with national policy in enabling the delivery of sustainable development over the Plan period without these estate regeneration proposals?

- 3.1 The vision and spatial strategy, which are essentially laying out what the Council intends the Borough to be in 2028 and how it might get there remains robust and effective. In terms of stimulating regeneration across the Borough and in areas of change, better transport, better housing and better facilities, aiding better health are the cornerstones of what the Council wishes to do and the absence of estate regeneration proposals will not change these. As outlined the delivery of additional homes on the three estates in question was not included in the supply of deliverable sites sufficient to provide five years' worth of housing against requirements (as advised at paragraph 47 of the NPPF). They are therefore not essential for the Plan to be found sound. They were included in the supply for years 6-10 where the NPPF advises that the supply should be on specific, developable sites or broad locations for growth. Footnote 12 of the NPPF advises that to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Other

alternatives for housing delivery will be explored to provide a significant quantum of new homes as mentioned in the vision and the strategic objective for the Council to boost the supply of homes in the Borough remains robust and effective.

- 3.2 The definition of sustainable development in the NPPF which makes reference to the three dimensions of economic, social and environmental are all comprehensively covered in the vision and spatial strategy and the removal of the estate regeneration proposals will make no difference to these building blocks. In terms of the social dimension in the vision the Council will continue to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment with accessible local services that reflect the needs of communities in the Borough and support their health.
- 3.3 The London Plan (March 2016) as part of its overview and introduction makes reference to three cross cutting themes: economic development and wealth creation, social development and the improvement of the environment (paragraph 0.4). The following paragraph (0.5) also refers to the principle that there should be equality of opportunity for all people by (amongst other criteria) by reducing health inequality and promoting Londoners' health. Climate change and the consequences of climate change to achieve sustainable development is also mentioned. All of these aspects are covered by the vision and spatial strategy and the removal of the estate regeneration schemes from the draft Plan will have no bearing on them.
- 3.4 In their letter of conformity with the London Plan dated 16 March 2017 (SUB9) the GLA commented that the vision is welcomed as it is comprehensive, ambitious and positively supports new development which will build on the success and strategic advantages of the Borough and its location and infrastructure. The Mayor also considered that the strategic objectives support the delivery of new development and the improvement of new facilities and amenities as well as supporting the local environment.
- 3.5 It was also noted that the strategic objective for housing had been amended to boost housing delivery in the Borough and the Mayor confirmed that the approach was in line with the "good growth" concept outlined in the Mayor's publication, "A City for All Londoners". A further letter from the GLA dated 3 November 2017 (CED007) dealing with further modifications confirmed that the 16 March 2017 letter was the Regulation 19 version. In it the GLA deal with the proposed modifications which related to the Council's decision to suspend estate regeneration projects. The letter did not deal further with the vision and strategic objectives, but it is assumed that the GLA were satisfied that they were not affected by the decision to remove the three estate regeneration proposals. It was reported in the letter that the Mayor was sympathetic to the decision, and he considered that, subject to an early review, the proposed modifications (and resulting Local Plan) would be in conformity

with the London Plan.

4. Should the changes be reflected in any further modifications to the vision in CV1? If so what changes should be considered?

- 4.1 Given the responses to the preceding questions it is considered that further modifications are not required to the vision in CV1. The vision deals with what the Council wish the Borough to look like in 2028 and the provision of better transport, better housing and better facilities, aiding better health is as important now as it was before the Grenfell Tower tragedy, arguably more so. The vision sets out the need for a strong and varied sense of place and working in partnership with other organisations and more importantly, our residents. In the coming months it will be decided how best this can be achieved to ensure that the Borough's residential quality of life is improved for everyone.