

RBKC – EXAMINATION IN PUBLIC

On behalf of Catalyst Housing

Local Plan Partial Review

Hearing Statement

Response to Issue 2c (1) and (3a to c), and Issue 3a (5)

February 2018



**Catalyst
Housing**

1.0 HEARING STATEMENT

INTRODUCTION

- 1.1 CBRE Limited (CBRE) is instructed by Catalyst Housing to address the Examining Inspector's questions on the RBKC Local Plan Partial Review (RBKCLPPR).
- 1.2 Catalyst Housing are one of the biggest housing associations in London and the South East. Catalyst Housing provide more than 21,000 homes, through a wide range of rental and homeownership opportunities.
- 1.3 Wornington Green Estate is owned by Catalyst Housing and is their single largest estate.
- 1.4 We refer the Inspector to the representations made on behalf of our client responding to the Proposed Submission consultation¹.
- 1.5 This Statement responds to the Inspector's Issue 2c (1) and (3a to c), and Issue 3a (5).

Issue 2c: Places and Site Allocations (Policy CP2, Vision CV5-6, CV8-9 and CV11-15, and Site Allocations CA1, CA3-4, CA6-7 and CA9-12)

Policy CP2 – Places

1. Is the strategic Policy CP2, in combination with the visions and principles, priorities and delivery expectations in each of the place chapters, consistent with national policy and is it capable of being applied effectively in future development management decisions.

- 1.6 We note that additional text has been added to the supporting text to Policy CP2 at paragraph 4.4.4 which sets out the Council's general design approach for estate regeneration schemes. As stated in our previous representations to the Regulation 18 consultation, CHG remain concerned about the general bias towards the construction of 'mansion blocks' and terraced housing as there are other housing typologies which may be appropriate to achieving higher densities.
- 1.7 Catalyst Housing consider that the text at paragraph 4.4.4 of the plan is not effective in the context of the NPPF as higher densities which exceed the London Plan density matrix could be acceptable in housing renewal areas as stated in the Housing SPG and reinforced in Chapter 2 and Policy 3.7 of the London Plan. The Local Plan should also anticipate the proposed removal of the current density matrix as proposed in the draft London Plan (December 2017) which encourages densities to be optimised through a design-led approach.
- 1.8 Catalyst Housing respectfully request that the following text (underlined below) is added to paragraph 4.4.4:

"Where appropriate new development will reflect street patterns and urban form to provide safety and legibility. Public spaces will be designed to be attractive, functional places accessible for all, used for a variety of public purposes, and not simply left over space around building. Housing densities will be appropriate for this part of London and local public transport provision. The approach on housing density will follow London Plan policies in decision making. This would not normally always mean more tower blocs as our

¹ CBRE representations to RBKC Local Plan Partial Review Regulation 19 Publication Policies (March 2017)

traditional townscape shows flatted terraced housing and mansion blocks can often meet the demand in a more appealing way. High quality materials reflecting the local context and well-designed detailed will enrich the appearance and add character and charm. New developments will become places to live as valued as their Georgian and Victorian predecessors and their architectural and urban design qualities perhaps becoming equally cherished as our "Conservation Areas of the Future".

Vision for Golborne (CV6) and Site Allocations for Wornington Green and Land adjacent to Trelick Tower (CA3 and CA4).

3. Are the updated vision for Golborne to 2028 (CV6) and site allocations for Wornington Green and Land adjacent to Trelick Tower (CA3 and CA4) sound? In particular:

a) in the light of the withdrawal of estate regeneration proposals elsewhere in RBKCLPPR, is the most appropriate approach to regeneration at Wornington Green and adjacent to Trelick Tower?

- 1.9 The regeneration of Wornington Green Estate was approved on 31 March 2010 by RBKC (ref: 09/02786) following extensive consultation with the residents of the estate, the local community and the Council. The development comprises of three phases with phase 1 now complete, phase 2 was started in 2017, and phase 3 outstanding. It is therefore an established project with the regeneration of the estate now in the latter stages. The existing homes on the site do not meet Decent Home Standards and the approved masterplan sought to re-provide all social rented units. The regeneration of Wornington Green brings significant benefits to the Golborne ward through the delivery of new private dwellings, the re-provision of social rented units, new shops and community facilities.
- 1.10 Catalyst Housing are entirely committed to completing the regeneration of Wornington Green and fully agree that regeneration of Wornington Green is the most appropriate strategy for RBKC.

c) Will the vision (CV6) and site allocation policies CA3 and CA4, combined with other relevant policies in the Plan, ensure the delivery of sustainable development in Golborne in accordance with national policy, including its protection of heritage assets and open spaces.

- 1.11 There are a number of references within the October 2017 Further Proposed Modifications stating that "any future estate regeneration projects would be co-designed with the community and put to a binding vote."²
- 1.12 The references to a binding vote currently lack detail and clarity and as such is not effective in the context of the NPPF. It is not clear in what context a binding vote will apply i.e. is it solely in relation to Council-owned estates or would it be a blanket requirement for all estate regeneration schemes.
- 1.13 Presumably the binding vote would not apply where an estate regeneration scheme already has full or outline planning permission. Clarity will need to be provided as to whether a vote would be required if an existing planning permission is varied, amended, or renewed.

² Proposed Modifications (October 2017), MAIN/014: paragraph 1.1.4, MAIN/018: 4.4.0, MAIN/027,

- 1.14 The mechanics of the voting process will also need to be explained. It is currently unclear as to how the voting process will sit in the context of RBKC's decision making process as the local planning authority.

Issue 3a: Diversity of Housing (Policies CP1 and CH1-CH6)

Amalgamations and Very Large Units (Policy CH1)

5. Is the policy on amalgamations and restricting very large units set out in criteria b, c and d of Policy CH1 justified in Kensington and Chelsea? Is it in conformity with the London Plan and consistent with national policy?

- 1.15 Draft policy CH1 resists the loss of residential units through amalgamation unless the amalgamation will result in the net loss of one unit only and the existing total floorspace of the new dwelling created will be less than or equal to 170 sq.m of GIA.
- 1.16 Whilst we appreciate the basic rationale for the policy, as stated in our Regulation 19 representations we believe the policy wording is not justified in the context of NPPF paragraph 182 on the soundness of Local Plans. No modifications have been proposed to the wording of the policy and as such we continue to have concerns with this policy.
- 1.17 Whilst Catalyst Housing make every effort to accurately forecast housing need for their developments; it is a situation which is in flux and for major regeneration schemes which are developed over a course of many years, such as Wornington Green, the housing need of occupants often change and we require flexibility in the policy to enable Catalyst Housing to make amendments to their schemes so that affordable units can be amalgamated where necessary to enable extended family living, and vice versa. For example, the profile of tenants on the Wornington Green estate is very diverse and it is not uncommon for multi-generational families to live together in a single unit for cultural reasons. As these families grow, they require larger units and one way of responding to these changing family circumstances, whilst allowing them to remain on the estate, is to amalgamate existing units. Catalyst Housing have a small number of larger units in their portfolio with a floorspace of 180sq.m.
- 1.18 In light of the above, to ensure that policy CH1 is justified we respectfully request that either:
- I. the floorspace limit is increased to 180sq.m GIA, or
 - II. the following wording for policy CH1 is added (see underlined text):

“resist the loss of residential units through amalgamations of existing or new homes unless the amalgamation will:

b. result in the net loss of one unit only and the total floorspace of the new dwelling created will be less than or equal to 170 sq m gross internal area (GIA), or

c. relate to affordable units managed by housing providers and amalgamation is required to respond to housing need to enable extended family living.”