

**Planning and Borough Development**

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My reference: PBD/JW/GLA/LP /1  
Please ask for: Jonathan Wade

Dear Mr Lett

**A City for all Londoners – response from the Royal Borough of Kensington and Chelsea**

I would like to take the opportunity to respond to this consultation as a precursor of the next version of the London Plan, picking up on some key themes that run through the document that relate to our Draft Local Plan, which is out to public consultation until 11 December, or key issues for this Borough.

**P. 21 Employment land in central London**

Having justified a Borough-wide exemption from permitted development change of use from office to residential this Council supports resisting wholesale moves to encourage offices to convert to housing. We accept that there may be an opportunity to boost housing supply in some boroughs through this route but this must not be a London-wide approach.

We support ensuring transport links to and from residential areas are reliable but this must not be at the expense of considering the areas within central London that they want to reach like the King's Road.

The Council endorses the strategy of expecting new investment in transport to act as a catalyst for regeneration and creating new opportunities for communities, where this is possible. We have demonstrated the regeneration benefits that a new Crossrail station at Kensal Canalside Opportunity Area would bring to the existing community, which includes areas that are amongst the poorest in the UK, as well as supporting delivery of a minimum of 3,550 new homes. We have also demonstrated the development can

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fund the necessary transport infrastructure and we are seeking the new Mayor's endorsement of our proposals, subject to a feasibility study by Network Rail which is commencing shortly. Conversely we are clear that without a Crossrail station it will be difficult for the site to accommodate as many homes and the amount of affordable housing that can be delivered will be significantly reduced. We would welcome the opportunity to arrange a visit to the site for the Mayor, and we hope future GLA documents will refer to the possibility of a Kensal Portobello Crossrail station at Kensal Canalside Opportunity Area.

#### **P. 22**

This Council is pleased to learn the Mayor is working with partners on funding for Crossrail 2 and we trust this will meet the original objectives of the line including a station to serve King's Road /Chelsea, the western part of which is not well served by the underground system but is major retail centre, a cultural centre, and a significant employment location including three major hospitals.

#### **P. 27 Cultural Growth**

We support the commitment to produce a cultural infrastructure plan and would like to draw attention to our Draft Local Plan that highlights the opportunity for the Council to lead the way in 'Cultural Place-making' to ensure that residents and visitors are aware of the full range of cultural facilities that are available particularly in our town centres: King's Road, Kensington High Street and Portobello Road as well as the South Kensington Strategic Cultural Quarter.

#### **P. 29**

The Council is an enthusiastic supporter of both Crossrail schemes, and believes that a station on the Elizabeth Line at Kensal would deliver huge benefits across North Kensington (as detailed under P21 above), which is surprisingly poorly connected to the major employment centres in the capital. In the Royal Borough's last remaining Opportunity Area, a station would allow the landowners to provide up to 5,000 new homes on the edge of central London.

In Chelsea, the Council has been a keen supporter of a Crossrail 2 station on the King's Road, which would put thousands of residents within easy reach of a station for the first time, and greatly expand Chelsea's connectivity to the rest of London. We hope that the draft Transport Strategy will recognize the wide-ranging benefits that both stations would bring.

#### **P. 41 Building more and increasing housing land supply**

We fully support the Mayor's desire to influence other public-sector bodies to help deliver housing where possible. We are confident that the Department for Transport is aware of the role that the North Pole Depot, which they own, has a crucial role in achieving the full development capacity of the whole of Kensal Opportunity Area both because of the homes that can be accommodated and the extra capacity that can be generated on the northern part of the site if new north / south road bridge can be built. However, we would welcome any support that the Mayor is able to provide to secure release of this land.

We would also like to stress the importance for NHS workers of providing a station at King's Road allowing easier commuting to the Chelsea and Westminster, the Royal Marsden and the Royal Brompton Hospitals.

This Borough is particularly unbalanced in terms of the housing types provided which are polarised between market housing which is unaffordable to all but the wealthiest and social rented housing. In view of this we support the principle of providing a variety of housing particularly in the affordable rented category. However, we also think that the time has come to accept that when Kensal Canalside, our last remaining brownfield site, has been developed this densely developed borough will not be able to accommodate continuing high levels of new housing because there simply is no room.

#### **P. 45 Global City**

We agree that providing a world-class transport infrastructure must be the key to ensuring that London remains a liveable and competitive city but we have concerns that short-term decisions may be made that could preclude this outcome particularly in relation to Crossrail 2 in King's Road. Similarly, we have demonstrated that our proposal for a Kensal Portobello Crossrail station will create extra capacity in a crowded part of the line that could make Crossrail services more reliable providing knock on benefits for the integration of HS2.

#### **P. 53 Small and medium sized businesses**

This borough is home to a great many small and medium sized businesses particularly associated with the music business and we are keenly aware that the prices paid for housing mean that all of these business would be forced out if they were not protected by our employment zone policies and prevention of permitted development change of use from office to residential.

We are interested to learn more about the Mayor's proposals to embed cultural objectives in regeneration given the Council's cultural place-making agenda.

#### **P. 58**

The Council shares the Mayor's concern about the state of our air quality, and believes there is a strong case for bringing forward the Ultra Low Emission Zone, and for extending it to the North and South Circular roads. We support proposals to reduce emissions from London's bus fleet, and hope that on the most polluted corridors, this will be done in advance of the ULEZ's extension to inner London.

#### **P. 62 -64**

As a borough that has championed schemes to improve conditions for pedestrians, we look forward to seeing more detail on the Mayor's proposals for "Healthy Streets". We believe there is scope to build more cycling Quietways in the Royal Borough, and across central London, so that there is a full Grid network of attractive routes on quieter roads. We are pleased that the Mayor recognizes the need to ensure that new cycling infrastructure is delivered in ways that minimise congestion impacts. As well as the health benefits of cycling, a key reason to persuade more people onto bikes is to reduce congestion and overcrowding on our public transport. Unfortunately, in the minds of many Londoners, and certainly in newspaper headlines, some cycling schemes are the cause of, rather than the solution to, traffic congestion. We hope that the Transport Strategy will set out how new cycling infrastructure can be provided in ways that do not add to congestion. This is not simply a question of the timing and manner of construction, although that is certainly an important aspect.

The Transport Strategy should be bold in its vision for increasing the number of walking trips. A "feet first" approach, as proposed for central London, will need to include active promotion of walking as a healthy and space-efficient alternative to motorized modes. TfL should not be shy about encouraging modal shift to walking from short bus trips, as it has done recently with short tube trips.

**P. 65 Good Architecture and Design**

This Council is committed to delivering good architecture and design. Over 70% of the Borough is covered by conservation areas reflecting their architectural quality of. Our Draft Local Plan states that our aspiration for all future large scale development, be this brownfield development or estate regeneration, is that they will be built to the highest design standards so that they too could be capable of designation as conservation areas in the future.

We welcome the statement that tall buildings will only be permitted if they make a positive contribution to the streetscape and skyline, and take account of activities at ground floor level, daylight, wind turbulence, glare and noise.

**P. 67**

We welcome the Mayor's commitment to protect residents and the local environment from the construction of mega basements in residential areas. This is a policy area which this borough as led on and we have experience which we can share with other boroughs.

**London's heritage**

We also welcome the Mayor's recognition of the need to preserve the historic character of London as part of the city's unique brand as a globally attractive business location and would particularly like to draw attention to the role that this borough plays in providing high quality historic housing which is attractive to the global business elite.

**P. 73 Active citizenship**

This Council is keen to widen participation in democratic governance and with Rome and Hamburg is piloting development of smarticipate an EU funded project to increase participation in planning. This project will use technology to make planning issues more accessible and propose projects for the neighbourhood element of CIL, including building a link to crowdfunding where projects are not suitable for CIL funding.

**P. 77**

The Council is delighted to note the Mayor's commitment to increasing the number of Underground stations that offer step-free access. There are several schemes in the pipeline in the Royal Borough, and we are very keen to ensure that these projects are taken forward as soon as possible – particularly in cases where third party developer works provide an opportunity for step-free schemes to be provided at much reduced cost.

I trust these comments will be useful, but if you have any queries, please do not hesitate to contact me.

Yours sincerely,



Jonathan Wade  
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