



10th December 2009

F.A.O. The Policy Team
Royal Borough of Kensington & Chelsea
The Town Hall
Hornton Street
London
W8 7NX

Our Ref RBKC Proposed
Submission Core
Strategy – Nth
Kensington

Dear Penelope,

**Royal Borough of Kensington & Chelsea Local Development Framework Consultation –
RBKC Proposed Submission Core Strategy with a focus on North Kensington**

Thank you for your consultation letter dated 29th October, regarding the Royal Borough of Kensington & Chelsea's Core Strategy Proposed Submission.

As you know, BW is a public corporation, which is sponsored by DEFRA. We manage and care for more than 2,200 miles of canals and rivers in England, Scotland and Wales on behalf of the British people. The Government charges us to:

- Maintain and develop Britain's inland waterways in a sustainable manner, so that they fulfil their full economic, social and environmental potential;
- Fulfil statutory navigation functions;
- Conserve waterway heritage and environment for the future;
- Promote and enable rural and urban regeneration;
- Maintain and enhance leisure, recreation, tourism and educational opportunities for the general public; facilitate waterway transport; and
- Play a lead role in co-ordinating with other UK navigation authorities.

BW's Corporate Strategy and Mission Statement set out the following:

- The business is to manage the inland water system efficiently for the increasing benefit of the United Kingdom;
- BW aims to provide safe and high quality environment for customers, staff and local communities;
- BW takes a commercial approach and strives for excellence in every aspect of work; and
- The heritage and environment of the waterways will be conserved, improved and made to work well for future generations.

British Waterways London 1 Sheldon Square Paddington Central London W2 6TT
T 020 7985 7200 F 020 7985 7201 E enquiries.london@britishwaterways.co.uk
www.britishwaterways.co.uk/london

Grand Union Canal Regents Canal London Docklands River Lee Navigation River Stort Navigation



We work extensively with private, public and voluntary partners to conserve, enhance and improve these waterways. Our expertise and responsibility for waterspace, combined with their ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for both economic and environmental gain. The canals in particular have historically experienced a prolonged period of decline. In recent years, the canals and navigational rivers have experienced significant development pressures from commercial, residential and tourism/recreation developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes in London.

BW's local vision for London is that 'London's Canals and Docks achieve a recognition and status of other historic London landmarks, occupying an important role in the strategic planning and regeneration of the capital city. A commitment to quality service and facilities will see visitor and boating activity double in the period up to 2012, and with a more engaged community, local pride and ownership will be engendered. Increased, but sustainable use of the canal and dock system, with appropriate balance between vibrancy and tranquillity, underpinned by our commercial activity will ensure their long-term prosperity'.

We passionately believe that our London network of multi-functional canals, navigable rivers and docks have significant untapped potential to deliver leisure, recreation, tourism, culture, heritage, biodiversity, education, sustainability and regeneration opportunities. For example, our waterways can help to deliver the Core Strategy's objectives by, amongst other things:

- Encouraging high quality, mixed use, waterside regeneration schemes with an appropriate mix of moorings can help to transform London's inclusive canals and navigable rivers and improve access to the towpath and the water for active use as open-air gyms or as quiet places to address inequalities in physical and mental health;
- Promoting the waterways as 200-year old 'working heritage' which are part of the third largest heritage estate in England and attract innovative and entrepreneurial businesses on and by the water;
- Place-making with the waterways integrated at the heart of new and existing communities contributing towards high quality environments;
- Transforming the city with well maintained and managed waterways in iconic locations with high quality modern architecture complementing 200-year old working heritage that can help to improve Londoner's health (open air gyms), welfare (strong focus for communities) and development (opportunities for volunteering, education, etc);
- Helping London to mitigate and adapt to climate change; and
- Providing a truly sustainable 100-mile long, transport network right across London for walking, jogging, cycling, waterborne passengers and freight.

In recognition of the pivotal role of the waterways in the planning and development processes, BW has produced 'Waterways & Development Plans' (2003) to guide the key stakeholders in the process of integrating the inland waterways into the development plan system. Your attention is also drawn to 'Waterways for Tomorrow' (DETR 2000) and 'Planning a future for the Inland Waterways' (Inland Waterways Amenity Advisory Council 2001).

In addition, the TCPA have published the Planning Advice Note “Inland Waterways” in July 2009, which offers comprehensive advice for maximising the potential of the nation’s waterways:
(<http://www.planningportal.gov.uk/england/professionals/en/1115316698771.html>)

British Waterways also recently collaborated with English Heritage to produce “England’s Historic Waterways: A working heritage - Promoting high quality waterside development” (2009), which is a very useful and informative guide that should be referenced to complement the document:
<http://www.helm.org.uk/upload/pdf/HistWat.pdf?1258977969>.

BW’s comments should therefore be considered in the context of the above documents, policies, guidance and advice.

In general we were pleased to acknowledge the emphasis document gives to the Grand Union Canal in promoting sustainable and active redevelopment of North Kensington, creating an active public realm around, and on, the waterways. We have the following specific comments to make:

Page 13 Executive summary

Here and elsewhere in the document, bridges over the Grand Union Canal are proposed to improve connectivity. These would need to be agreed with British Waterways.

Page 19 The London Plan 1.2.8

As a Key Stakeholder for Kensal Canalside, British Waterways wish to be involved in any future proposals for this area.

Chapter 5 Kensal

5.1.3

As we stated in our previous comments, it is an overriding principle of British Waterways that the waterways can bring communities together, both alongside and on water, and we resist the view that they are boundaries. In their presentation - “The Magic is in the Water” - to the Olympic Delivery Authority, the architects, Farrells, reiterated the role of waterspaces as connecting, not dividing, communities.

CV 5: Vision for Kensal in 2028

The vision should be slightly amended to include an active waterspace.

Chapter 6 Golborne/Trellick

6.1.1

The canal is again referred to here as a boundary (as well as at 33.3.3 and 33.3.27), although we are pleased that within the CV 6 Vision for Golborne / Trellick in 2028, the canal is mentioned as a destination rather than a barrier.

Better Travel Choices

At 6.3.20, “Better access could be created to the Grand Union Canal to open and integrate it into the network of local pedestrian routes” cycle routes should also be added.

20.2 Allocation

At 20.2.6, the Grand Union Canal should be seen as a focal point rather than an isolator of the site.

We are not aware of being consulted on the Kensal Canalside Pre-feasibility Study, 2009, and would like to ensure that we are fully involved in proposals for this area.

20.2.11

We support the canal's role in providing biodiversity, although this should not be additionally enhanced in ways that may hinder the canal's primary role for navigation.

In delivering sustainability, the canal should also be utilised for SUDS and heating and cooling of buildings, and an assessment of the feasibility of these methods should be required as part of any redevelopment.

Delivery agencies

20.3.3 British Waterways should be highlighted here, particularly in terms of the provision of a bridge over our land and waterspace. We also have significant experience in facilitating the delivery of successful waterside developments.

I hope the above comments are helpful – please read them in conjunction with our previous comments submitted. Please do not hesitate to contact me if you have any queries.

Yours sincerely,



Claire McAlister
Planner - London
Telephone: 020 7985 7229 E-mail: claire.mcalister@britishwaterways.co.uk