

# Schedule of representations and Officer's response at pre-submission stage





Partial Review of the Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Name	Organisation	Q1 is the document sound?	Q2 Is it Legally compliant	Positively prepared	Justified	Effective	Consistent with national policy	not to be legally complaint	Comment 2 if NO Please give more details why	Informal RBKC Response for Planning Appeal purposes only
1- Neil Henderson on behalf of Cadogan Estates	Gerald Eve	No	Yes		Yes	Yes			<p>It is considered that the document is unsound as it is neither justified nor effective for the reasons set out in the following text.</p> <p>Draft policy wording: "The Council will resist the change of use of any building where the current use contributes to the character of the surrounding area and to its sense of place" (page 9, part a(ii)).</p> <p>This policy seeks to resist the change of use of any building which contributes to the character/significance of the area and its sense of place. This policy is considered neither justified (ie. the most appropriate strategy has not been selected) or effective.</p> <p>It is considered that the most appropriate strategy for resisting the change of use of any building which contributes to the character/significance of the area has not been explored. If it is considered that a use should be protected because it contributes to the area, it is more appropriate that it is added to the assets of Community Value List through the Localism Bill which will have weight in the determination of any planning application proposing a change of use.</p> <p>The policy wording is also not considered to be effective. The scope of the policy is too broad and it is unclear what the Royal Borough is seeking to achieve given that the control of uses is considered adequately covered by other policies in the Core Strategy. This policy is highly subjective in terms of whether a use contributes to the character or appearance of the area and particular since its sense of place. The 'value' of a use will not be determined until an application has been submitted and consulted upon, incurring substantial costs for a landowner and creating significant uncertainty which will ultimately discourage investment in the Borough.</p> <p>Therefore we consider that the wording of this policy remains wholly inappropriate and impractical and should be deleted.</p> <p><b>Public Houses policy</b></p> <p>Draft Policy wording: "The Council will resist the loss of public houses and other drinking establishments (Class A4) throughout the Borough" (Policy CK2 Part B, page 12).</p> <p>This draft policy seeks to resist the loss of Class A4 uses throughout the Borough. This policy is considered neither justified nor effective for the reasons set out below.</p> <p>Paragraph 3.3 of the Issues and Options (March 2012) document highlights in relation to the loss of public houses that "the rate of loss has not accelerated over the longer timescale". Paragraph 3.2 states that the last 5 years has seen a slight increase in the loss of public houses compared with the period 2002-2007 however the</p>	<p>In terms of justification, a policy is required which goes beyond simply assessing the visual appearance of a property and assessing how this contributes to an area. The use of a building is clearly a material planning consideration. How that use can contribute to the character of an area and its sense of place is also a material consideration and this is reflected in the NPPF. Paragraph 126 of the NPPF states that local planning authorities should take into account opportunities to draw on the contribution of the historic environment to the character of a place. Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. A further consideration is the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality. These are all factors which indicate as to why such an approach is justified within a conservation area or when it involves a listed building.</p> <p>However, it is not just in conservation areas and listed buildings where such an approach can be justified. Paragraph 69 of the NPPF states that planning policies should achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with one another, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity. Safeguarding the use of a building for a non – residential use can be part of the process of how this is achieved.</p> <p>In terms of the scope of the policy being too broad it is accepted that it is primarily focused on the character of an area and clearly use is part of the character assessment of a conservation area. Under s72 of the Planning, Listed Buildings and Conservation Areas Act 1990 'special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area.' On this basis it is recommended that the policy is moved to apply in conservation areas only where there is a statutory duty to assess character. On this basis it is recommended that it is moved from being part of Policy CL1 to Policy CL3 where it will be part of the assessment of character. This is considered to be supported by NPPF wording.</p> <p>In terms of effectiveness of the policy the framework for judging the whether a building's use contributes to the character and significance of the surrounding area, and its</p>

						<p>table below highlights that the increase related to the loss of only one public house over this 5 year period. Furthermore, paragraph 30.3.4 of the current consultation document (September 2012) advises that only a third of the Borough's total pubs has been lost over the past 30 years. It is therefore considered wholly unnecessary to have a blanket protection on public houses on the basis of this evidence without any flexibility and <b>therefore the policy is not considered to be justified.</b></p> <p>The policy is also not considered to be effective. There is concern that this onerous and prescriptive restriction will ultimately discourage investment in this land use and the Borough. The emergence of the Royal Borough's Core Strategy has resulted in very little flexibility on land uses which has significant implications on the Estates ability to rationalise land uses and maintain a balanced approach to Estates overall composition. The blanket restriction on the loss of public houses will only exacerbate the situation.</p> <p>This policy also does not allow any flexibility for instances where public houses are not well used, become unviable or to meet modern day requirements, they require configuration. In some instances, the site may be better utilised for other land uses and therefore flexibility needs to remain. It is also not clear as to whether the policy relates also to ancillary floorspace or whether the loss of even part of the public house floorspace would be resisted i.e. if you reduce the floorspace of a public house by half will this be resisted?</p> <p>In the first instance, we request the deletion of this policy. However, should it be considered appropriate and necessary to promote such a policy relating to public houses, and without prejudice to our principal position that we consider this wholly inappropriate, then a number of criteria should be introduced to the policy to allow for circumstances where the loss of a public house will be acceptable. We suggest the following wording:</p> <p><b>"The Council will resist the loss of public houses and other drinking establishments (Class A4) throughout the Borough unless the proposal meets one or more of the following criteria:</b></p> <ul style="list-style-type: none"> <li><b>i. The existing use has an unacceptable impact on surrounding amenity;</b></li> <li><b>ii. The existing use is no longer commercially viable;</b></li> <li><b>iii. The reuse of the site for an alternative use/uses would bring about greater planning benefits to the Borough outweighing its loss;</b></li> <li><b>iv. The existing use is relocated or replaced elsewhere".</b> <p><b>Draft policy wording: "The Council will resist the loss of restaurants and cafes (Class A4) and financial and professional services (Class A2) outside of high order town centres".</b></p> <p>We do not consider this policy effective as it will result in very limited flexibility on land uses within the Estate which has implications on the ability to rationalise land uses and will discourage investment in such land uses.</p> <p>Again there is no flexibility in the wording of the policy. In some cases, it may be appropriate to allow for the loss of a restaurant or cafe where it has a negative impact on amenity in terms of noise or smells. Importantly, this restriction will stifle flexibility for those areas outside of higher order centres to evolve and develop to meet community needs and objectives is likely to result in unviable restaurants/cafes becoming, and remaining, vacant. It should be noted that the existing policy CF3 (D) within the Core</p> </li></ul>	<p>sense of place comes from the criteria mentioned in paragraph 34.3.4 of the reasoned justification. There are four components specifically mentioned which the local planning authority would be assessing any application against – these are variety; surprise and delight; punctuating the street scene and adding vitality and character to the area. By their very nature, these are subjective judgments, but none the less they could be assessed and the fact they cannot be assessed quantitatively should not diminish the importance of the policy. Given the latitude of the permitted development within the A Class itself it is more likely that this policy would be used to assess those applications which are likely to involve a change of use to a Class C3 Dwelling house and given the criteria it would not be difficult to assess whether this would contribute to the character and significance of the surrounding area and its sense of place.</p> <p>The fact that the value would not be assessed until a planning application is submitted is immaterial. The Royal Borough operates a comprehensive and efficient pre-application service and a developer could quickly establish whether a proposal might be contrary to the policy. In terms of flexibility the particular merits of a proposal will always be treated as a material consideration. However, the market to turn most uses over to residential is extremely strong and the Council makes no apology for taking a robust approach.</p> <p><b>Public House Policy</b></p> <p>With regard to public houses and the number that have been lost the latest evidence demonstrates that the loss of public houses in the Borough is increasing. For example since March of this year there have been 3 planning applications involving the loss of public houses and there have recently been 4 applications which are the subject of pre-application enquires. These are only the public houses which would be the subject of specific planning control - clearly others will change as permitted development through the Use Classes Order and have done. The figures for the loss of public houses under reported the situation because it did not take into account those lost without the need for planning permission. The trend is not one of slowing in the loss of public houses, it is the reverse.</p> <p>The need for a policy to resist the loss of public houses is not wholly based on a number crunching exercise in any case - this completely misunderstands the need for a policy - there are other factors which are material considerations to justify the need for a public house policy – indeed paragraph 70 of the NPPF states that to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities such as public houses and other local services to enhance the sustainability of communities and residential environments. Paragraph 70 also states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day- to- day needs. Indeed the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/ A/12/2172342) dated 17 September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection</p>
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<b>2- Mel Barlow-Kay</b>	Dron & Wright obo LFEP A (London Fire And Emergency Planning Authority )	No				Yes			<p><b>Ref Policy CL1 context and Character), a ii) (Also paragraphs 34.2.2 and 34.3.4)</b></p> <p>We reiterate that this policy is not effective as it is not deliverable over it's period. LFEP A determine the location of their fire stations based on response times, fire cover and other operational matters. It would be detrimental to the safety of the local community to insist on retaining a fire station use on a site, in order to preserve character. The character of a building should not be held of greater importance than the provision of a fast and effective fire service. LFEP A should not be restrained from providing such a service, in favour of the reservation of a building's character.</p> <p>We therefore request again that the policy document be amended to make clear that the character of a fire station property should be considered entirely separately from the actual use, as it is possible to retain the property's character without maintaining the use.</p>	<p>The policy is aimed at use and how this can contribute to the character of an area and its sense of place – the function of a building could be part of this. The reasoned justification to the policy has identified specific criteria against which the value of the use could be judged. It is not accepted that a property's character can necessarily be maintained when the original use is lost. This will inevitably lead to a dilution of the significance and character of the building and its contribution to a sense of place. However, each case would have to be treated on its own merits. It is recommended that it is now only be applied in conservation areas in any case.</p> <p>The loss or relocation of fire stations could sensibly be appraised against the policy taking into account other health and safety considerations which would be material considerations. Clearly if a robust case could be put forward that a fire station was no longer required by the Fire Brigade it would be highly unlikely that the Council would insist that the use would be retained. Clearly each case must continue to be assessed on its own merits taking the particular use into account.</p>
<b>3- Michael Fearn</b>	Shireconsulting On behalf of Barclays Bank Plc	No		Yes	Yes	Yes	Yes	Yes	<p>There is no objectivity in this proposed amendment at all and as further evidence of the difficulty that the Council will be putting itself in when determining applications we note the latter element of proposed paragraph 30.3.14A which reads: "The Borough has experienced a number of traditional public houses changing into other drinking establishments which do not provide the same community function to residents. However, these changes do not represent a change under the Town and Country Planning (Use Classes) Order 1987 and cannot be controlled by the Council". It is unclear who is to make the assessment as to what constitutes a pub which is worth protecting, as opposed to one that is not and what objective criteria might be available. The Council has already rightly admitted that it has no control over the nature of the Class A4 use and it is unclear how the proposed policy amendment can be objectively and sensibly administered.</p> <p>The question also has to be asked as to whether the Council's 'support' for 'community pubs' will stretch to those operators needing to alter their business model in order to improve their viability, say, by extending their opening hours. There may be many cases where the objectives of strengthening viability of existing pubs and protecting the amenity of residents are incompatible. In this scenario the plan does not make clear which objective will take precedence (Appendix 1 is the recent appeal decision at Princedale Road that considered these very same conflicts). The plan is not based on evidence and is therefore unsound.</p> <p>We also draw attention to the further comment at paragraph 182 of the</p>	<p>Conversely, to the approach outlined the Council is actually providing certainty in its approach by not trying to define when a pub is a pub as opposed to another type of drinking establishment. This will only be a recipe for confusion and uncertainty. Objective criteria cannot be developed on this basis and it is notable that the author of the comment has advanced no criteria about how such an assessment should be made.</p> <p>The amenity of residents and viability are not incompatible - it is not clear why this should be included in a policy – they are material considerations and can be appraised.</p> <p>With regard to what the author is advancing as a community public house is not clear – what is a community facility to one person will not be to another but the facility itself serves a useful purpose – as paragraph 69 of the NPPF states, planning policies should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with one another. The Council would contend that this could be undertaken in a bar just as easily as in a 'community public house' whatever this means although this has not been made clear by the author.</p> <p>The latest evidence demonstrates that the loss of public houses in the Borough is increasing. For example since March of this year there have been 3 planning applications</p>

NPPF, which states that policies must be 'Justified' and "the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". The only 'evidence' for this proposed amendment is set out at 30.3.14A which discusses the loss of some 30% of the Borough's stock of public houses since 1980, suggesting that this is mostly pressure from the residential market. In March 2012 the Council produced an "LDF SA / SEA Scoping Report Addendum" for its proposed policy upon public houses. Paragraph 4.4 of that 'Scoping Report' noted that the "number of pubs has decreased from 168 in 1980 to 110 in 2012"; a net loss of 58 public houses (the current consultation document asserts that the number of pubs was 181 in 1980 but uses the same residual figure of 110 for 2012). It is not clear whether this entire starting number (either the 168 or 181) is considered to comprise 'community pubs' and whether the 'loss' (either the 71 or 58) were all 'community pubs' or whether some of these establishments were other forms of Class A4.

Table 2 of the 'Scoping Report' (included below) is also interesting, as it identifies how these public houses were 'lost' (the figures in the table below actually totals 72 outlets).

It can be seen that the majority (54%) were 'lost' by the action of permitted development as their use changed to restaurants or other shopping activities such as shops. The inclusion of the 10 vacant pubs accounts for a further 14% of these 'losses', raising the figure for which the Council's proposed policy would have no effect to some 68%. It should also be remembered that the 10 vacant pubs will not necessarily have lost their Class A4 use through falling vacant, but it may be that they are just no longer economic to operate as 'community pubs'.

Residential (C3)	Residential / Offices (C3/B1)	Offices (B1)	Take away/Shop (A5/A1)	Drinking Establishment/Suis Generis (A4/SG)	Suis Generis (SG)
13	2	1	1	1	1
Shop (A1)	Financial and Professional Services	Restaurant (A3)	Demolished	Vacant	Other
3	4	32	2	10	2

The table shows that the 'loss' of pubs to residential use equates to less than 0.5 a pub per year and so upon examination of the Council's own evidence this is not a land-use issue and is only a perceived problem. The adopted Core Strategy refers to the lack of evidence of this being an issue and having reviewed the position two years on, the same conclusion is reached. One must therefore question the need for the policy revision at all as it is not 'Justified'.

The proposed changes to Policy CK 2 ("Local Shopping and other Facilities which Keep Life Local") are also 'unsound'. The proposed resistance to the loss of uses within Classes A1-4 "outside of Higher Order Town Centres" will not be 'effective' or 'deliverable', as it does not consider the operation of permitted development rights. The embargo upon loss of existing non-residential uses does not take into account matters of viability. An isolated property may not be viable in its current use and a change to another activity (whether residential or non-residential) may be the best means of preventing long-term harmful vacancy.

**Closing Comments**

involving the loss of public houses and there are currently 4 applications which are the subject of pre-application inquiries. These are only the public houses which would be the subject of specific planning control - clearly others will change as permitted development through the Use Classes Order and have done. The figures for the loss of public houses under reported the situation because it did not take into account those lost without the need for planning permission.

The need for a policy to resist the loss of public houses is not wholly based on a number crunching exercise – in fact this misses the main point of the policy - there are other factors which are material considerations to justify the need for a public house policy – paragraph 70 of the NPPF states that to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities such as public houses and other local services to enhance the sustainability of communities and residential environments. Paragraph 70 also states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day- to- day needs. Indeed the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/A/12/2172342) dated 17 September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection of public houses and the Framework is more recent. On this basis there is more than sufficient justification for a policy and it is clearly in line with the NPPF.

There has also been increasing concern from individual residents, Councillors and residents' associations about the loss of public houses within conservation areas which contribute to the character and appearance of the area, its vitality, and sense of place. To this end a resolution was passed at a full Council meeting in December 2011 that the loss of public houses should be reviewed with regard to introducing a planning policy to prevent their loss and this is a material consideration as part of an evidence base. The concern was also crystallised in the loss of the 'Prince of Wales' public house in Princedale Road (which contributed for all the factors mentioned above) on appeal last year. The Inspector specifically commented that there was no policy within the Core Strategy that prevented its loss and therefore the appeal was allowed. The Council, have now made it clear that this situation cannot continue and need to take action now to prevent further detriment to the character of the Borough.

It is acknowledged that uses can change within the A Class of the Use Classes Order without the need for planning permission. There will be public houses that may evolve into another A class use without planning permission, but this is surely an argument for retaining public houses rather than allowing them to be lost to non A Class uses, invariably residential use. As stated a policy resisting the loss of public houses cannot be justified solely on a number crunching exercise – this shows a fundamental misunderstanding as to why the policy was developed.

With regard to other uses Classes A1 to A4 outside of

									To summarise the Bank's objection neither amended policy (nor their associated reasoned justification) is 'positively prepared', 'justified', 'effective' or 'consistent with national policy'. The Council's own evidence demonstrates the lack of necessity for the proposed policy amendments and the proposed revisions are therefore unsound.	Higher Order Town Centres the Council is aware of permitted development rights, but the principal point is that vitality is retained and a pub changing to a gastro -pub or a restaurant would still allow a place where members of the community could come together and would allow a place to maintain its vitality. The issue of viability is a material consideration and will be treated on its own merits, but it does not need to be included in the planning policy itself.
4- Simon Avery	Bell Cornwell Partnership on behalf of the RAB Pension Trust	No		Yes	Yes	Yes	Yes	Yes	<p>Re: "Draft planning policy for the protection of public houses and a draft planning policy relating to use and character" -Third Party Representations.</p> <p>We wrote on 25<sup>th</sup> April 2012 on behalf of RAB Pension Trust, OBJECTING to the Issues and Options Draft Proposals for changing the December 2010 Core Strategy policy for Public House uses. A copy is attached, to avoid unnecessary repetition of the rationale for these new OBJECTIONS. to the above two draft policy changes.</p> <p><i>1) Public Houses and other uses which provide a wider social role:</i></p> <p>i) As paragraph 3.2 of our 25/4/2012 letter demonstrates, there is no up-to-date evidence of increased public house loss to other uses since the Core Strategy Policy was adopted, since which time only 3 pubs across the whole Royal Borough range of 113 pubs have changed their use. That is the up-to-date evidence for assessing the effectiveness of the currently adopted Core Strategy policy. To seek to rely on data from 1980, as does paragraph 4.1 of this draft planning policy document both fails the test of applying up-to-date evidence and is in any event reusing the same evidence base which provided the justification for the current policy two years ago.</p> <p>The evidential basis for this proposed change thereby fails to comply with the National Planning Policy Framework (NPPF) requirements of paragraph 154, which requires local plans to be realistic and paragraph 158 which requires the local plan to be based on adequate, up-to-date and relevant evidence.</p> <p>On that basis the proposed draft policy is not <b>"consistent with national policy"</b> as expressed in those two NPPF paragraphs and it therefore fails that fourth test of "soundness", as expressed in NPPF paragraph 182.</p> <p>Neither can the Draft planning policy be said to be "objectively assessed" when faced with the evidence of very little change in the number of public houses since the Core Strategy was adopted. It thereby fails the first test of Soundness by failing to be <b>"positively prepared"</b>.</p> <p>With such limited change on the ground since the Core Strategy policy was adopted, the Draft planning policy fails the third test of <b>"soundness"</b>, since it fails to be <b>"justified"</b>.</p> <p>ii) Furthermore, the draft policy fails to take account of the prevailing "permitted development rights" for any Class A4 use, including pubs, to change to Class A3, Class A2 and Class A1 uses without the need for planning permission. There is no mention made of this in the Draft policy</p>	<p>The latest evidence demonstrates that the loss of public houses in the Borough is increasing. For example since March of this year there have been 3 planning applications involving the loss of public houses and there are currently 4 applications which are the subject of pre-application inquiries. These are only the public houses which would be the subject of specific planning control - clearly others will change as permitted development through the Use Classes Order and have done. The figures for the loss of public houses under reported the situation because it did not take into account those lost without the need for planning permission.</p> <p>The need for a policy to resist the loss of public houses is not wholly based on a number crunching exercise - there are other factors which are material considerations to justify the need for a public house policy – paragraph 70 of the NPPF states that to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities such as public houses and other local services to enhance the sustainability of communities and residential environments. Paragraph 70 also states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day- to- day needs. Indeed the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/ A/12/2172342) dated 17 September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection of public houses and the Framework is more recent. On this basis there is more than sufficient justification for a policy and such a policy is in conformity with the NPPF. It is not clear why it would fail the tests of soundness on this basis.</p> <p>There has also been increasing concern from individual residents, Councillors and residents' associations about the loss of public houses within conservation areas which contribute to the character and appearance of the area, its vitality, and sense of place. To this end a resolution was passed at a full Council meeting in December 2011 that the loss of public houses should be reviewed with regard to introducing a planning policy to prevent their loss and this is a material consideration as part of an evidence base. The concern was also crystallised in the loss of the 'Prince of Wales' public house in Princedale Road (which contributed for all the factors mentioned above) on appeal last year. The Inspector specifically commented that there was no policy within the Core Strategy that prevented its loss and therefore the appeal was allowed. The Council, have now made it clear that this situation cannot continue and need to take action now to prevent further detriment to the character of the Borough.</p>



								<p>document. The impact of those "permitted development rights" is to subject the policy to being ineffective and not deliverable.</p> <p>As a result it fails the "soundness" test of being <b>"effective"</b> and again thereby fails the "soundness" test of being <b>"consistent with national policy"</b>.</p> <p><b>The "Draft planning policy for the protection of public houses" is not "sound" and should not be pursued further.</b></p> <p><b>2) Use and character:</b></p> <p>The wording of this draft policy is vague and open therefore to wide variation and a lack of clarity.</p> <p>No where does it define what <i>"contributes to the character and significance of the surrounding area, and to its sense of place"</i> means, or what criteria or evidence-base should be applied to assess whether that applies in any individual circumstance across the length and breadth of the Royal Borough and the variety which is experienced there.</p> <p><b>It</b> consequently fails the <b>NPPF paragraph 154</b> requirement for every policy to provide a clear indication of how a decision-maker should react to a development proposal. <b>It</b> thereby fails the <b>"soundness"</b> test of not being <b>"consistent"</b> with national policy.</p> <p>Once again, no account has been taken of prevailing national "permitted development rights" which allow a wide range of changes of use to be exercised without the need for planning permission. "Uses which contribute to the character and significance of the surrounding area" can be said to exist in Use Classes A, B, C and D. As a result, this draft planning policy is again rendered <b>"undeliverable"</b> it fails the "soundness" test of not being <b>"effective"</b>.</p> <p>With regard to the evidence-base for this proposed policy, there is none provided. <b>It</b> thereby wholly fails the <b>NPPF paragraph 158</b> requirement to be based on adequate, up-to-date and relevant evidence. Consequently it is <b>"unsound"</b>, both in terms of not being <b>"justified"</b> and in terms of not being <b>"consistent with national policy"</b>.</p> <p><b>The "draft planning policy relating to use and character" is wholly "unsound" and should not be pursued further.</b></p>	<p>The need for the policy to take into account permitted development rights is not clear. It is acknowledged that uses can change within the A Class of the Use Classes Order without the need for planning permission. There will be public houses that may evolve into another A class use without planning permission, but this is surely an argument for retaining public houses rather than allowing them to be lost to non A Class uses, invariably residential use. As stated a policy resisting the loss of public houses cannot be justified solely on a number crunching exercise – this shows a fundamental misunderstanding as to why the policy was developed.</p> <p>With regard to other uses Classes A1 to A4 outside of Higher Order Town Centres the Council is aware of permitted development rights, but the principal point is that vitality is retained and a pub changing to a gastro -pub or a restaurant would still allow a place where members of the community could come together and would allow a place to maintain its vitality and for service uses to be retained. The policy is specifically aimed at the loss of A Class uses to residential use (Class C3) which is a very attractive proposition given the highest residential property prices in the United Kingdom.</p> <p>Use and Character response</p> <p>The framework for judging whether a building's use contributes to the character and significance of the surrounding area, and its sense of place comes from the criteria mentioned in paragraph 5.2 of the reasoned justification. There are four components specifically mentioned which the local planning authority would be assessing any application against – these are variety; surprise and delight; punctuating the street scene and adding vitality and character to the area. By their very nature, these are subjective judgments, but none the less they could be assessed in a rational way. Given the latitude of the permitted development within the A Class itself it is more likely that this policy would be used to assess those applications which are likely to involve a change of use to a Class C3 Dwelling house and given the criteria it would not be difficult to assess whether this change of use would contribute to the character and significance of the surrounding area and its sense of place.</p> <p>In terms of justification, a policy is required which goes beyond simply assessing the visual appearance of a property and assessing how this contributes to an area. The use of a building is clearly a material planning consideration. How that use can contribute to the character of an area and its sense of place is also a material consideration and this is reflected in the NPPF. Paragraph 126 of the NPPF states that local planning authorities should take into account opportunities to draw on the contribution of the historic environment to the character of a place. Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. A further consideration is the positive contribution that conservation of heritage assets can make</p>
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									<p>to sustainable communities including their economic vitality. These are all factors which indicate as to why such an approach is justified within a conservation area or when it involves a listed building.</p> <p>In terms of the scope of the policy being too broad it is accepted that it is primarily focused on the character of an area and clearly use is part of the character assessment of a conservation area. Under s72 of the Planning, Listed Buildings and Conservation Areas Act 1990 'special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area.' On this basis it is recommended that the policy is moved to apply in conservation areas only where there is a statutory duty to assess character. On this basis it is recommended that it is moved from being part of Policy CL1 to Policy CL3 where it will be part of the assessment of character. This is considered to be supported by NPPF wording.</p> <p>The existence of permitted development within the Use Classes Order cannot be a justification as to why such a policy approach is not justified. Indeed it may be justification for the need for a policy where control exists. Given the latitude of the permitted development within the A Class itself it is more likely that this policy would be used to assess those applications which are likely to involve a change of use to a Class C3 Dwelling house and given the criteria it would not be difficult to assess whether this change of use would contribute to the character and significance of the surrounding area and its sense of place. It is not clear why, where control exists, it could not be effective.</p> <p>A sound evidence base exists for the policy and it is in accordance with national policy.</p>
5- Sarah Round	Savills obo the Welcome Trust	No	Yes	Yes	Yes	Yes	Yes	<p><b>Conclusion:</b></p> <p>It is clearly stated in the Core Strategy that with regard to the loss of pubs within the Borough, 'the Council considers that there is too little evidence to resist their loss at the present time.'</p> <p>This position has not changed. Based upon the evidence within the Issues and Options document, the following points should be specifically highlighted:</p> <p>The rate at which pubs are being lost is lower today than in the period from 1980-2002;</p> <p>There has been no significant change in the rate at which pubs are being lost during the past 10 years;</p> <p>There is no evidence that the loss of a limited number of pubs has resulted in parts of the Borough being deprived of a community function within easy reach;</p> <p>There is no evidence that alternative uses such as restaurants and cafes are not also contributing a community function, either instead of or in addition to pubs within the Borough;</p> <p>There has been no significant change in the rate of loss in the 15 month period between the adoption of the Core Strategy in December 2010 and the publication of the Issues and Options document in March 2012;</p>	<p>The figures quoted for the loss of public houses have already been discussed – they provide an incomplete picture of the situation and indeed the number of applications or inquires that involve the change of use of public houses has increased since these figures were published.</p> <p>With regard to public houses and the number that have been lost the latest evidence demonstrates that the loss of public houses in the Borough is increasing. For example since March of this year there have been 3 planning applications involving the loss of public houses and there are currently 4 applications which are the subject of pre-application inquires. These are only the public houses which would be the subject of specific planning control - clearly others will change as permitted development through the Use Classes Order and have done. The figures for the loss of public houses under reported the situation because it did not take into account those lost without the need for planning permission. The trend is not one of slowing in the loss of public houses, it is the reverse.</p> <p>The need for a policy to resist the loss of public houses is not wholly based on a number crunching exercise - this completely misunderstands the need for a policy - there are other factors which are material considerations to justify the need for a public house policy – indeed paragraph 70 of the NPPF states that to deliver social, recreational and cultural facilities and services the community needs, planning</p>

								<p>There is an adequate number of pubs across the Borough to meet the needs of residents, whereby the entire Borough is located within a 10 minute walk of one of the 110 drinking establishments;</p> <p>Considered together, all of these points show that the situation with regard to the loss of pubs in the Borough has not significantly changed recently. The evidence does not support any claim that the loss of pubs now needs to be specifically resisted, anymore more than there was not at the point when the Core Strategy was adopted. As such, there are no grounds to justify an alteration of the Development Plan.</p> <p><b><u>We therefore reject all options set out within the consultation document.</u></b></p> <p>Finally, we would also note that the Council has withdrawn and replaced the Issues and Options document published during the life of the consultation. We would note that the two versions made publicly available differ in terms of the figures for the net loss of pubs set out in the table under paragraph 3.3.</p> <p>We would therefore urge the Council to resist making unnecessary alterations to the Core Strategy and trust that this assessment will be consider in full as part of the consultation process.</p>	<p>policies and decisions should plan positively for the provision and use of shared space, community facilities such as public houses and other local services to enhance the sustainability of communities and residential environments. It also states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day – to –day needs.</p> <p>The claim that the Council withdrew the Issues and Options document during its consultation is false. The need for a policy is not based on a number crunching exercise and the comments display a fundamental misunderstanding of why the policy has been developed. Indeed the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/ A/12/2172342) dated 17 September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection of public houses and the Framework is more recent.</p>
6- Thomas Edmunds	Savills obo JPP One LLP	No	Yes	Yes	Yes	Yes	Yes	<p><b>Conclusions</b></p> <p>The Council's current policy, adopted as recently as December 2010, states with regards to public houses that <i>"there is too little evidence to resist their loss at the present time."</i></p> <p>This position has not changed, and from the evidence base on which the Council are attempting to justify a change in policy the following statements can be made:</p> <ul style="list-style-type: none"> <li>• The rate at which pubs are being lost is lower today than in the period from 1980-2002</li> <li>• There has been no significant change in the rate at which pubs are being lost during the past 10 Years</li> <li>• There is no evidence that the loss of a limited number of pubs has resulted in parts of the Borough being deprived of a community function within easy reach</li> <li>• There is no evidence that alternative uses such as restaurants and cafes are not also contributing a community function, either instead of or in addition to pubs within the Borough</li> <li>• There is an adequate number of pubs across the Borough to meet the needs of residents, whereby the entire Borough is located within a 10 minute walk of one of the 110 drinking establishments</li> </ul> <p>Following on from this, no evidence has been presented on why the Council considers it is necessary to protect Class A3 and Class A2 Uses.</p> <p>This is an unsound approach to formulating a planning policy. It is essential that any development plan has a sound evidence base and a robust justification for the policies which flow from this. The "options" presented by the Council in their March 2012 'Issues and Options' consultation document had already assumed that a change in policy was needed in the first place when clearly the evidence shows otherwise.</p> <p>With regards to the more nebulous wording of the proposed policy concerning character and use, no framework or means of assessment has been defined against which proposals can be assessed and the policy as proposed is simply too vague to work properly.</p>	<p>The figures quoted for the loss of public houses have already been discussed – they provide an incomplete picture of the situation and indeed the number of applications or inquires that involve the change of use of public houses has increased since these figures were published.</p> <p>With regard to public houses and the number that have been lost the latest evidence demonstrates that the loss of public houses in the Borough is increasing. For example since March of this year there have been 3 planning applications involving the loss of public houses and there are currently 4 applications which are the subject of pre-application inquires. These are only the public houses which would be the subject of specific planning control - clearly others will change as permitted development through the Use Classes Order and have done. The figures for the loss of public houses under reported the situation because it did not take into account those lost without the need for planning permission. The trend is not one of slowing in the loss of public houses, it is the reverse.</p> <p>The need for a policy to resist the loss of public houses is not wholly based on a number crunching exercise - this completely misunderstands the need for a policy - there are other factors which are material considerations to justify the need for a public house policy – indeed paragraph 70 of the NPPF states that to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared space, community facilities such as public houses and other local services to enhance the sustainability of communities and residential environments. Paragraph 70 also states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day- to- day needs. Indeed the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/ A/12/2172342) dated 17</p>

									<p>For the reasons set out above, <b><u>we reject the policies proposed by the consultation document.</u></b></p> <p>We would therefore urge the Council to resist making unnecessary alterations to the <i>Core Strategy</i> and trust that these representations will be considered in full as part of the consultation process.</p>	<p>September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection of public houses and the Framework is more recent. On this basis there is more than sufficient justification for a policy and such a policy is in conformity with the NPPF. It is not clear why it would fail the tests of soundness on this basis.</p> <p>The reason for a policy to protect A2 and A3 uses is also not based on number crunching. It is a response to protecting those facilities which are supported by paragraph 70 of the NPPF that are valued facilities and services. In a Borough with the highest residential land values in the whole of the United Kingdom there is acute pressure to change these uses to residential accommodation. This is not an unsound approach to formulating planning policy – what is unsound is to rely purely on numbers lost. This implies that there must be a substantial loss of such uses before the Council is entitled to formulate a policy when to all intents and purposes it will be too late. In any case the Council is perfectly entitled to decide when there should be a change in policy; it does not make the process unsound as a result.</p> <p>The rise in property prices is not an unsupported claim and is based on sound evidence. Indeed evidence from Savill's own property team in '<i>Spotlight on London's Housing Supply – Summer 2012</i>' states that high demand from equity rich buyers and scarce supply has driven a V-shaped recovery in London, in contrast to the UK average. Savills expect the divergence to continue. In terms of the prime and super prime market which is centred on Westminster and Kensington and Chelsea, these are expanding markets according to Savills. In the super prime market (5 million plus) the annual supply of new residential properties is set to double to over 100 sales in 2014. In 2011 there were twice as many transactions in this market compared to 2006, as a result of strong demand from a growing number of global billionaires and house price inflation in this segment. Clearly all non residential uses will continue to be under threat to change to residential use unless the Council intervenes.</p> <p><b>Use and Character response</b></p> <p>The framework for judging whether a building's use contributes to the character and significance of the surrounding area, and its sense of place comes from the criteria mentioned in paragraph 5.2 of the reasoned justification. There are four components specifically mentioned which the local planning authority would be assessing any application against – these are variety; surprise and delight; punctuating the street scene and adding vitality and character to the area. By their very nature, these are subjective judgments, but none the less they could be assessed in a rational way. Given the latitude of the permitted development within the A Class itself it is more likely that this policy would be used to assess those applications which are likely to involve a change of use to a Class C3 Dwelling house and given the criteria it would not be difficult to assess whether this change of use would contribute to the character and significance of the surrounding area and its sense of place.</p> <p>In terms of justification, a policy is required which goes</p>
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									<p>beyond simply assessing the visual appearance of a property and assessing how this contributes to an area. The use of a building is clearly a material planning consideration. How that use can contribute to the character of an area and its sense of place is also a material consideration and this is reflected in the NPPF. Paragraph 126 of the NPPF states that local planning authorities should take into account opportunities to draw on the contribution of the historic environment to the character of a place. Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. A further consideration is the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality. These are all factors which indicate as to why such an approach is justified within a conservation area or when it involves a listed building.</p> <p>In terms of the scope of the policy being too broad it is accepted that it is primarily focused on the character of an area and clearly use is part of the character assessment of a conservation area. Under s72 of the Planning, Listed Buildings and Conservation Areas Act 1990 'special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area.' On this basis it is recommended that the policy is moved to apply in conservation areas only where there is a statutory duty to assess character. On this basis it is recommended that it is moved from being part of Policy CL1 to Policy CL3 where it will be part of the assessment of character. This is considered to be supported by NPPF wording.</p>
<b>7- Daisy Blench</b>		No	Yes	Yes	Yes	Yes		<p>The British Beer &amp; Pub Association is the leading trade association representing the brewing and pub sector in the UK, representing members accounting for 95% of the beer brewed in the UK and around half of Britain's 51,000 pubs.</p> <p><u>Policy CK 2</u></p> <p>We have previously commented on the consultation on the Pub Options paper published by the Council and then the Draft Planning Policy published and we stand by our previous comments that the intended policy does not account for the huge changes that have taken place in the market and the fact that many pubs are now no longer viable and therefore will be unable to remain open with their original use. We also maintain that the policy is likely to be counterproductive. We question the soundness of this policy on the following grounds:</p> <ol style="list-style-type: none"> <li><b>Positively prepared</b> – We do not believe that the policy is in line with this requirement as we do not believe that it will allow sustainable development as outlined in the National Planning Policy Framework. The NPPF does not promote the implementation of restrictive planning policies intended to prevent businesses from adapting to changing economic circumstances and trends, however, we believe this policy does exactly that.</li> <li><b>Justified</b> – We do not accept that this is the most appropriate strategy to promote the retention of pubs in the Borough. In seeking to implement this policy the Council is ignoring the 'Community Right to Bid' powers which have just come in and which is the most appropriate mechanism to help local people save a local pub, if there is sufficient support within the</li> </ol>	<p>It is noted that the British Beer and Pub Association recognise the value of public houses. However, it is also noted that they do not support a policy resisting the loss of such facilities but concentrate on why flexibility is required to convert to other non –public house uses.</p> <p><u>Policy CK2.</u></p> <p>The issue of viability is a material consideration and one that would be taken into account and weighed against the policy. A proper marketing report could also deal with this concern and would also be a material consideration. To state that such a policy is not positively prepared and in line with the NPPF is clearly wrong. As previously stated the Planning Inspector at the recent appeal into the Cross Keys Public House, 1 Lawrence Street (Appeal Decision APP/K5600/ A/12/2172342) dated 17 September 2012, commented that the National Planning Policy Framework carries significant weight and the adopted Core Strategy is in conflict with it in relation to the protection of public houses and the Framework is more recent. Clearly the need to protect public houses is in line with the NPPF.</p> <p>The 'Community Right to Bid' provisions would not be affected by a planning policy resisting the loss of public houses. This is an additional safeguard for the community. However, given the very high cost of land and buildings in Kensington and Chelsea the provisions of the Localism Bill</p>

									<p>community. Seeking to implement further restrictions through the planning system will place further burdens on business and will not save pubs that are no longer viable.</p> <p>3. <b>Effective</b> – we do not accept that this policy will be effective in preventing pubs from closing in the Borough and therefore not deliverable. The policy is also likely to have the opposite effect as, if businesses are unable to sell unviable pubs then this will affect their ability to reinvest in other more viable sites and therefore more pubs may close.</p> <p>4. <b>Consistent with National Policy</b> - Finally, we do not believe that it is consistent with National Policy both because of its lack of reference to the 'Community Right to Bid' powers which have recently been introduced but also because it stems from misinterpretation of the National Planning Policy Framework. The NPPF has sought to reduce red tape and delays around planning to allow business to more easily adapt to changing markets. Whilst the NPPF contains references to 'promoting the retention of local services' is clearly does not encourage local planning which is prescriptive and restricts development and growth. Whilst many pubs are of enormous value to their communities, they are still businesses and the economic climate means that not all will remain viable with less people using them. Companies and individuals must be allowed to sell these unviable pubs, possibly for alternative use and reinvest in sites where it will be more beneficial.</p>	<p>may be an unrealistic proposition. The provisions would not provide sufficient protection on their own to prevent the further loss of public houses in the Borough.</p> <p>The policy is clearly consistent with national policy as the recent appeal decision at the Cross Keys public house in Chelsea demonstrated.</p>
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	Name	Organisation	Q1 is the document sound?	Q2 Is it Legally compliant	Comment 1 If you have selected YES and you wish to support the soundness or legal compliance of this Development Plan Document, please be as precise as possible when setting out your comments below	RBKC Response to soundness consultation
8	Michael Bach	Kensington Society			<p>The Kensington Society <b>strongly supports</b> the Council's proposed new policy to provide additional protection for pubs and other A Use Class uses from being converted to housing.</p> <p>The proposed changes are designed to provide the evidence base and reasoning for the new policy. We <b>strongly support</b> this, but consider that it needs strengthening by:</p> <ul style="list-style-type: none"> <li>reaffirming the status of pubs as a social and community use;</li> <li>identifying the recent surge of applications for change of use to housing since 2009 as support for the need for a change of policy; and</li> <li>using more of the key words in both the NPPF (paragraphs 69 and 70) and the Mayor's London Plan (Policy 7.1), which is part of the development plan for the Borough, to provide evidence of support for this local policy.</li> </ul> <p>To achieve these changes, we have attached an annotated version of those paragraphs where the text is proposed to be changed to indicate our proposed further alterations.</p> <p><b>Changes needed</b></p> <p><b>Definition of public houses as a social and community use:</b></p> <p>The Local Plan already acknowledges that public houses are social and community uses in paragraph 30.3.5 and 30.3.7 (which is being deleted), but fails to list them in the listing in paragraph 30.3.4. This must be rectified to indicate that public houses are a mainstream social and community use. On its own and without the positive acknowledgement in the now redundant/omitted paragraph 30.3.7, there is no longer a strong, positive statement recognising the public</p>	<p>Comments are noted including the register of support for the policy.</p> <p>In terms of the changes needed public houses whilst it is acknowledged that public houses are social and community uses they have not been added to the list as part of paragraph 30.3.4 as they will not be appraised as part of Policy CK1. However, it is acknowledged that to avoid confusion they can be added to the list but it will be made clear that they will be appraised under amended Policy CK2, not CK1.</p> <p>The proposed paragraph 30.3.14A is not considered to be required – it is acknowledged in the draft reasoned justification to the policy that the number of public houses has seriously declined over the last 30 years and the evidence shows that the number being lost has increased in the last year. The figures are constantly changing so the proposed paragraph could be come quickly dated. In any case, it is not considered to add anything more to the policy. No change is proposed.</p> <p>In terms of marketing it is acknowledged that this is a material consideration. However, it has wider implications than just the policy regarding public houses so a reference to marketing is likely to be included in the changes being made to the 'Fostering Vitality' chapter of the Core Strategy – it will therefore be able to cover a wider number of uses than just public houses. A practice note will be produced that gives the requirements.</p>

				<p>houses as a social and community use. Indeed, paragraph 30.3.5 merely explains the limits to protection because of the freedom to change to A3, A2 and A1 uses.</p> <p><b>Action Required:</b></p> <p>Paragraph 30.3.4: Add “public houses” after “health facilities” in the list.</p> <p>New Paragraph 30.3.14A: Delete first two sentences of the proposed change and substitute the following:</p> <p>“Pubic houses are social and community uses which have come under extreme pressure for change of use to housing since 2009. Prior to that only 6 pubs had been lost to housing in the previous decade, but since 2009 the number of applications have risen sharply. Over the last 30 years the losses to the Borough’s stock of public houses have eroded an easily accessible social focus for the local community. From 181 pubs in 1981 to 110 in 2012, nearly 40 per cent have been lost and with escalating residential property prices, this trend is set to continue, if not checked by a change in policy. ....”</p> <p>There is no mention of evidence of marketing of the pub premises in cases where pubs have been closed. A sentence could be added somewhere to say something along the lines of</p> <p>“in order to ensure conformity with the requirements of the NPPF, saved practice guide to PPS5 etc, and to be considered sound, to demonstrate non-viability/redundancy of use, the policy and/or the reasoned justification should make reference to the need for evidence of robust and reasonable marketing”. Other Councils have similar requirements in their policy documents.</p> <p>Please register this representation of support.</p>	
9	<b>Terence Bendixson</b>	The Chelsea Society		<p>The Chelsea Society warmly supports the Council in seeking to adapt the Core Strategy to give greater protection to public houses.</p> <p><b>1. CONTEXT</b></p> <p>Numerous pubs in Chelsea have already been lost. These include The Beehive, The Queen's Elm and The Man in the Moon. The Society has consistently resisted changes of use at such establishments: more recently it has played a major role at a public hearing into the fate of the Cross Keys in Lawrence Street and at a public inquiry into the future of The Phene Arms in Phene Street. In both of these last two cases owners were appealing against refusals for changes of use to mansions that they want to sell on the international property market.</p> <p>That is the major threat today to pubs in Chelsea. It is not they publicans are failing to make a living: it is that the buildings are immensely more valuable as locations for hot money that investors are seeking to place in a safe and profitable haven.</p> <p>A further hearing for the Queen's Head, also into an appeal against refusal for housing, is pending and, once again, the Society will be supporting the Borough Council. What these appeals have already demonstrated – and the Queen's Head no doubt will - is the extent and strength of public opinion in Chelsea to retain pubs that remain. Residents, visitors and tourists alike all value the warm, open character of Chelsea's public houses – but it is very unlikely that they will be writing letters like this one.</p> <p>The Society will give evidence about this at any public hearing into the proposed changes to the Core Strategy.</p> <p><b>2. THE TEXT</b></p> <p>Turning to the details of the revised text the Society has the following observations to make:</p> <p>1. The importance of the social and community use of public houses needs to be</p>	<p>Context - Noted</p> <p><b>The TEXT</b></p> <p>In terms of more explicitly stating the benefit of public houses as social and community uses as part of Policies CL1 and CK2 the reasoned justification for Policy CL1 deals more with the contribution of the use of a building to the character of an area - this may not necessarily be a social and community use so it would be inappropriate and confusing to include a specific reference to it. No change is proposed.</p> <p>With reference to Policy CK2 public houses will be added to the list of social and community uses but it will be made explicit that they are addressed by revised Policy CK2 rather than CK1.</p> <p><b>Character and Use Policy</b></p> <p>The proposed change to the policy is not supported. To resist a change of use of a property because it might be of convenience to residents or offers scope for social and community activity is far too wide ranging and open to interpretation. The policy would no longer be effective, and therefore sound. No change is proposed.</p>

					<p>more explicitly stated in Policies CL1 and CK2. It is not enough to have such wording in the preamble.</p> <p>2. May we suggest the following change to CL 1. a ii):</p> <p>resist change of use in any building where the current use contributes to the <u>convenience of residents, scope for social and community activity</u>, the character of the surroundings, and sense of place. (Addition underlined.)</p>	
10	<b>Anthony Walker</b>	Edwardes Square Scarsdale and Abingdon Association			I am writing to confirm ESSA's support for the Kensington Society's proposed amendments to the document.	Support noted
11	<b>David Devedlaka</b>				<p>Concerning your proposed changes to the Core Strategy in order to protect public houses from disappearing and the further improvements proposed by the Kensington Society may I state my strong support of all these efforts.</p> <p>I, as a local resident of long standing, do not wish to see another pub disappear, we have lost too many of this essential local meeting places!</p>	Support noted
12	<b>Dr Margaret Thompson</b>	Secretary Physic Triangle Residents' Association			It is very good policy We strongly support it	Support noted
13	<b>Henry Peterson</b>	St Helens Residents Association	Yes	Yes	<p>The St Helens Residents Association fully supports the council's proposed new policies on resisting change of use to public houses.</p> <p>Our area is currently experiencing the loss of the North Pole pub in North Pole Road W12. This has been a pub in its present building since the early part of the 20th century, and has recently been purchased by Tesco for conversion to a Tesco Metro convenience store. This will threaten the existing post office, chemist, and butcher in North Pole Road, and the vast majority of local residents are opposed to Tesco's plans.</p> <p>We also support the comments of the Kensington Society on the proposed new policies and their future implementation.</p>	Support noted
14	<b>James Redmayne</b>				<p>I am writing to register my strong support for the Council's proposed changes to strengthen their policy to protect pubs.</p> <p>I would also like to register my support for the further improvements proposed by the Kensington Society</p>	Support noted
15	<b>John Cooper</b>	European Director			<p>I <b>strongly support</b> the Council's proposed new policy to provide additional protection for pubs and other A Use Class uses from being converted to housing.</p> <p>However I consider that it needs strengthening by:</p> <ul style="list-style-type: none"> <li>reaffirming the status of pubs as a social and community use;</li> <li>identifying the recent surge of applications for change of use to housing since 2009 as support for the need for a change of policy; and</li> </ul> <p>Pubic houses fulfil social and community uses but have come under extreme pressure for change of use to housing since 2009. Prior to that only 6 pubs had been lost to housing in the previous decade, but since 2009 the number of applications have risen sharply.</p>	<p>With reference to Policy CK2 public houses will be added to the list of social and community uses but it will be made explicit that they are addressed by revised Policy CK2 rather than CK1.</p> <p>Identifying the recent surge in applications is not considered to be required – it is acknowledged in the draft reasoned justification to the policy that the number of public houses has seriously declined over the last 30 years and the evidence shows that the number being lost has increased in the last year. The figures are constantly changing so the proposed paragraph could be come quickly dated. In any case, it is not considered to add anything more to the policy. No change is proposed.</p>



				<p>Over the last 30 years the losses to the Borough's stock of public houses have eroded an easily accessible social focus for the local community. From 181 pubs in 1981 to 110 in 2012, nearly 40 per cent have been lost and with escalating residential property prices, this trend is set to continue, if not checked by a change in policy.</p> <p>Please register this representation of support</p>	
16	<b>Cllr. Linda Wade</b>	Earl's Court Ward		<p>I agree with much of what Michael Bach of the Kensington Society has put forward as comments on this policy, but I feel that there should be some discretion as to the change of use for certain public houses that are neither providing amenity or are hubs for anti-social behaviour, and therefore each application should be considered on its own merit. There should be a clear distinction between pubs such as The Phene Arms or The Crossed Keys and The Tournament and Infinity – they are simply not in the same league.</p>	<p>It would be highly problematic to differentiate between public houses that do not provide 'amenity' or are hubs of antisocial behaviour and those that are not, it would be an entirely subjective judgment and would favour those owners who run badly managed premises. If a public house fulfilled none of the criteria that have been identified as important then this could be taken into account as a material consideration. However, it would only serve to weaken any policy if it was amended along the lines suggested. No change is proposed.</p>
17	<b>Matthew Carpen</b>	GLA		<p>As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004. It is my opinion that the submission document is in general conformity with my London Plan.</p> <p>Mayor of London</p> <p><b>Conclusion</b> 12. The proposed changes to the supporting text, reasoned justification and policies described in the partial review of the Core Strategy are in general conformity with the London Plan. The changes are therefore supported and do not raise any strategic issues.</p>	<p>GLA response – general conformity with the London Plan</p>
18	<b>Paul Miller</b>			<p>I would like to express my strongest support for the Council's proposed changes to strengthen their policy to protect pubs. We have been losing them at a rapid rate in RBK&amp;C and if we do not protect them we run the risk of having a community very much diluted.</p> <p>The Royal Borough has always been a much more socially and culturally mixed community than the recent stereotype of the area as a banker's ghetto would suggest. If property prices alone are allowed to dictate the use of buildings then this is under threat, a development that no-one will ultimately be happy with.</p> <p>I would like to support the further improvements proposed by the Kensington Society and the Chelsea Society</p> <p>I know the Chelsea Society has also been actively supporting this proposal as well, so both Kensington and Chelsea are representing the best interests of the Royal Borough. We must have foresight about the type of community that we want to have over time.</p> <p>I am especially concerned that there is considerable temptation on the part of pub owners, given the high costs of real estate, to run pubs down in order to apply for change of amenity. I believe that protection of the status of pubs is the best way to protect them.</p>	<p>Support noted</p>

19	<b>Richard Sarll</b>				<p>I would like to express my strongest support for the Council's proposed changes to strengthen their policy to protect pubs. We have been losing them at a rapid rate in RBK&amp;C and if we do not protect them we run the risk of having a community very much diluted.</p> <p>I would like to support the further improvements proposed by the Kensington Society and the Chelsea Society</p> <p>I know the Chelsea Society has also been actively supporting this proposal as well, so both Kensington and Chelsea are representing the best interests of the Royal Borough. We must have foresight about the type of community that we want to have over time.</p> <p>I am especially concerned that there is considerable temptation on the part of pub owners, given the high costs of real estate, to run pubs down in order to apply for change of amenity. I believe that protection of the status of pubs is the best way to protect them.</p>	
20	<b>William Dorrell</b>	Dovehouse Street Residents' Association			<p>I am writing to strongly support the Council's proposed changes in the Core Strategy.</p> <p>The loss of Chelsea pubs has been increasing since developers have been free to change their use to hugely profitable large houses; to a lesser extent the same thing has been happening to local restaurants and shops.</p> <p>I would therefore particularly single out the policy of protecting pubs, restaurants of quality and small businesses which do so much to enrich the life of the local community. These are mainly set out in Chapter 30, paragraphs 30.3.4A, 30.3.4B &amp; 30.3.4C.</p> <p>The question of <b>use</b> is of special importance as described in Chapter 34 para 34.3.4 which states that '<i>the distinctive character of many buildings comes from their use</i>' ... which '<i>adds to the vitality and character of the area</i>'.</p>	Support noted
21	<b>Tim Nodder</b>	Chairman Oakley St Residents Association			<p>I consider that the strengthening of the policy in the proposed changes to the Core Strategy has been well prepared, with appropriate consultation, and that the revised policies are justified in the interests of the community by preserving the valuable contribution of pubs and other local services which meet residents and workers needs.</p>	Support noted
22	<b>Daniel McKeiver</b>		Yes	Yes		The fact that the proposed policies are considered sound is noted.
23	<b>Randd Alexander</b>	Sydney St. & District R.A. (R. Alexander)			<p>We fully support this document. We recognise that it was prepared by the Council after a careful and extensive examination of the value of pubs to their local neighbourhoods and the wider community.</p>	Support noted

24	Steven Cornish		Yes	Yes		The fact that the proposed policies are considered sound is noted.
25	RD Pamplin				<p>As a Chelsea resident, born and bred in Chelsea, I am very concerned about what has been and continues to happen to our public houses. As you know, many have already changed use (becoming homes, bookmakers, restaurants, banks, and so on) and while some have become very successful businesses (Eight over Eight) making a 'contribution', others have simply resulted in short term gains for property speculators. Moreover, few of the 'business' conversions seem to have survived for long.</p> <p>I understand that the Council has a policy to 'save' PHs - my sense is that the policy should be to <i>protect</i>. The weak, sickly and sinners need saving; whereas monuments and treasures need to be protected. While most public houses are clearly not in this category, some are. That said, and more seriously, all PHs can and often do serve as very useful places for residents and visitors to mix and meet socially - what a better way to integrate (which is rarely the purpose of restaurants ...)</p> <p>The trend to convert pubs into designer eateries and gastro pubs (eg X Keys and the Phene) is moot (whether or not one likes them), often creating a business model with high costs and significant commercial risk, especially taking account of the fierce competition in the Borough and close by. Pubs on the other hand can and should operate on a lower cost base and should not be seen in a super league, trying to compete with Michelin Star places with entirely different business models.</p> <p>Perhaps the Council should encourage 'unplugged' pubs by charging discretionary lower rates and providing (staff and other) subsidies where a pub is judged to provide more than beer, where it meets a local, social need, perhaps running football, cricket, drats and quiz teams, days out for the locals (eg Sydney Arms racing days). Perhaps the Council could even patronise some of the designated social pubs by organising meetings and events there and so on. I am about to start an evening course at Imperial College - why not in a pub in Chelsea?</p> <p>I don't think we need hundreds of these, just a couple per ward - worthy of consideration? Maybe ...</p> <p>Besides, property investors make enough money already in Chelsea and Kensington and must surely be discouraged from further asset stripping activities. What next, schools? Although we could turn estate agents offices into residential accommodation ...</p>	Support noted. The other initiatives suggested are not a planning matter.

26	<b>Andrew Bailey</b>				<p>As a long term resident of Chelsea I wanted to express my support for the retention of Public Houses in the Borough which are at risk of development and their progressive loss.</p> <p>Public Houses are part of the historical and social background of our community which add colour, amenities and employment. They provide diversity and local social centres at many levels and Chelsea would be a greyer, more monotonous society if they are allowed to be taken over.</p> <p>Please register my plea against their being lost to development.</p>	Support noted
27	<b>David Hammond</b>	Natural England			<p>We can see nothing within the above document that is likely to affect any of Natural England's concerns and we therefore we do not wish to offer any substantive comments, nor does this policy appear to pose any likely or significant risk to those features of the natural environment.</p>	Noted.
28	<b>Claire Craig</b>	English Heritage			<p>Thank you for the opportunity to provide comment on the Royal Borough of Kensington and Chelsea's Partial Review of its Core Strategy pertaining to the policies on Public Houses. As the Government's adviser on the historic environment, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of local planning.</p> <p>English Heritage has reviewed the document in light of the National Planning Policy Framework (NPPF), which includes, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Having done this, English Heritage can advise that we are satisfied with the treatment of heritage assets and historic environment issues in the consultation documents, and have no wish to challenge the documents' soundness or legal compliance.</p> <p>It must be noted that this advice is based on the information provided by the Royal Borough and for the avoidance of doubt does not reflect our obligation to advise the Royal Borough on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the Core Strategy, and which may have adverse effects on the environment despite strategic environmental assessment.</p>	Support noted.
29	<b>John Eagle</b>	Ten Acres Residents' Association			<p>Over the years we have lost countless public houses, some of architectural interest, some less so but all of which are a centre and a focus for the communities in which they sit. Both the Phene and the Cross Keys are iconic Chelsea Pubs, once gone, gone forever. Please do not allow any more pubs to disappear!</p>	Support noted.
30	<b>Hazel Smith</b>				<p>As a retailer (a century plus old family business)/resident (over 40 years) of the King's Road, Chelsea, and Chair of The King's Road Trade Association (covering Sloane Square to Park Walk) I would like to register my support for the content of the draft policies and, at this stage, I believe they are 'sound, justified, effective and positive'.</p> <p>However, I cannot comment on whether or not they are 'in accordance with the regulations' and can only assume they are, since experts drew them up, as I personally am not an expert in this field!</p>	Support, and faith in officers noted.
31	<b>Sandra Yarwood</b>				<p>I wish to support the proposed changes to planning policy to protect pubs from being changed into housing and other use and I also support the proposals made by the Kensington Society.</p>	Support noted.

32	<b>William Dorrell</b>	Duke of York's Resident's Action Group			<p>I am writing to strongly support the Council's proposed changes in the Core Strategy.</p> <p>The loss of Chelsea pubs has been increasing since developers have been free to change their use to hugely profitable large houses; to a lesser extent the same thing has been happening to local restaurants and shops.</p> <p>I would therefore particularly single out the policy of protecting pubs, restaurants of quality and small businesses which do so much to enrich the life of the local community. These are mainly set out in Chapter 30, paragraphs 30.3.4A, 30.3.4B &amp; 30.3.4C.</p> <p>The question of use is of special importance as described in Chapter 34 para 34.3.4 which states that 'the distinctive character of many buildings comes from their use' ... which 'adds to the vitality and character of the area'.</p>	Support noted.
33	<b>Charles Hopkins</b>				<p>We support this.</p> <p>It is unfortunate that it cannot go further, as the Use Classes Order does not distinguish between social uses, such as pubs and restaurants, and commercial uses (shops and offices).</p> <p>It would be good if the Council could lobby to alter that.</p>	Support noted. The Council has lobbied the CLG to seek reforms to the UCO. The message is very clear, that further restrictions will not be forthcoming.
34	<b>Tonya Hoffman</b>				<p>I would like to express my strongest support for the Council's proposed changes to strengthen their policy to protect pubs. We have been losing them at a rapid rate in RBK&amp;C and if we do not protect them we run the risk of having a community very much diluted.</p> <p>I would like to support the further improvements proposed by the Kensington Society.</p> <p>I know the Chelsea Society has also been actively supporting this proposal as well, so both Kensington and Chelsea are representing the best interests of the Royal Borough. We must have foresight about the type of community that we want to have over time.</p> <p>I look forward to hearing from you in due course and am happy to pledge my support.</p>	<p>Comments are noted including the register of support for the policy.</p> <p>With regard the "improvements" proposed by the Kensington Society:</p> <p>In terms of the changes needed public houses whilst it is acknowledged that public houses are social and community uses they have not been added to the list as part of paragraph 30.3.4 as they will not be appraised as part of Policy CK1. However, it is acknowledged that to avoid confusion they can be added to the list but it will be made clear that they will be appraised under amended Policy CK2, not CK1.</p> <p>The proposed paragraph 30.3.14A is not considered to be required – it is acknowledged in the draft reasoned justification to the policy that the number of public houses has seriously declined over the last 30 years and the evidence shows that the number being lost has increased in the last year. The figures are constantly changing so the proposed paragraph could be come quickly dated. In any case, it is not considered to add anything more to the policy. No change is proposed.</p> <p>In terms of marketing it is acknowledged that this is a material consideration. However, it has wider implications than just the policy regarding public houses so a reference to marketing is likely to be included in the changes being made to the 'Fostering Vitality' chapter of the Core Strategy – it will therefore be able to cover a wider number of uses than just public houses. A practice note will be produced that gives the requirements.</p>
35	<b>Margaret Fawcett</b>	Astell Street Residents' Association			<p>I would like to register my strong support for the council's policy of seeking to protect public houses in the borough from change of use applications. As I have said in the many letters of protest I have sent on this subject, they make a vital contribution to the community and help to preserve the area's unique character.</p>	Support noted.
36	<b>Graham Frazer</b>				<p>I understand that you are conducting a consultation about the loss of Public Houses in the RBKC, and the effect that this has on local amenities</p> <p>Certainly in Chelsea we have lost a number of excellent pubs over the past 20 years including the Australian, the Moore Arms, The Queens Elm, etc, etc, and a number of others that have either been converted into shops, restaurants, and even private homes</p> <p>This has a very detrimental effect on an area that used to pride itself on its diversity and offered many interesting places for relaxation and enjoyment. It then becomes in danger of becoming a residential ghetto.</p>	Support noted.

					I have heard that there are several applications in the pipeline to close and convert several more pubs and I hope that the Council will resist these applications	
37	<b>Christian Dewar Durie</b>				<p>I understand that the Council has been developing a policy for saving Public Houses, I wish to advise you of my support for this policy.</p> <p>We have been much saddened and frightened by the recent information of threats to several landmark public houses in the area and have been supporting the petitions for saving them.</p> <p>I was unaware until this evening that the Council was developing a policy for preserving them.</p> <p>Please add my name to the supporters.</p> <p>I have tried to register my support via your portal but have been unable to make it work.</p>	Support noted.
38	<b>John Holiday</b>				<p>I have just become aware of the council's "Draft planning policy for the protection of public houses and a draft planning policy relating to use and character, June 2012".</p> <p>In my view, any further reduction in the number public houses in the borough would be disastrous to the residents' and to the visitors' sense of place, and should be protected at all costs against the current imbalance in market forces identified in the draft policy statement.</p> <p>Coffee bars are no substitute, as public houses continue to play a very important role as "gathering" places.</p>	<p>Support for protection of public houses is noted.</p> <p>Planning permission is not required for the change of use of a public house to a coffee bar. The Council, cannot, therefore introduce a policy which resists such development.</p> <p>As coffee bars are "Class A1" use planning permission is not re</p>
39	<b>Lisa Garrett</b>		Yes	Yes	<p>I very much support this plan and believe it to be "Positively prepared" and "more than Justified" , and if it's allowed to grow then it will be "Effective" .</p> <p>"Public Houses and other uses which provide a wider social role</p> <p>The Council will resist the loss of Public Houses and other Drinking Establishments (Class A4) throughout the Borough; and Restaurants and Cafes (Class A3) and Financial and Professional Services (Class A2) outside of Higher Order Town Centres.</p> <p>5 Draft Policy and Reasoned Justification for Character and Use</p> <p>5.1 The distinctive character of many buildings may come from their use as much as their physical appearance. Their use may also contribute to the character of an area and to a sense of place.</p> <p>5.2 The Borough contains a scatter of incidental uses within its residential neighbourhoods which offer variety, surprise and delight, punctuate the street scene and add to the vitality and character of the area.</p>	Support noted.
40	<b>Sarah Tate</b>				I think the public houses are part of the character of Chelsea and should be preserved.	Support noted.

41	<b>Martin Flash</b>	Royal Avenue Residents		<p>On behalf of Royal Avenue residents (I am chairman of the residents association) could we make three points</p> <ol style="list-style-type: none"> <li>1. There is no point in denying that pubs cannot be viable on beer sales alone (called in the trade the beerage), the tastes and nature of local residents in Chelsea has changed too much.</li> <li>2. For that reason if no other the value of the pubs as convertible property in a high value property area is undeniable.</li> <li>3. However they can still contribute to the local area providing life and movement as restaurants or gastro pubs. There are many successful examples, the closest to us being the Surprise</li> </ol> <p>We would therefore support a policy that DOES NOT allow redevelopment as residential property, but DOES allow and encourage change of use towards purveyors of food and drink, restaurants, gastro pubs etc</p>	<p>Support noted.</p> <p>The submission policy allows for changes of use to restaurants, gastro pubs and to other drinking establishments. Use as a drinking establishments (such as a wine bar) is not considered development, whilst uses such as restaurants are permitted (and don not require planning permission) under the provisions of the General (Permitted Development) Order. A change of use to residential will be resisted.</p>
42	<b>Judy St Johnson</b>	Markham Street Residents Association		<p>I strongly support The Council's Policy on resisting the closure of Public Houses in Chelsea</p>	<p>Support noted.</p>
43	<b>E P Colquhoun</b>			<p>I fully support RBK&amp;C in Chelsea's policy on keeping The Phene and other pubs open and denying the people who want pubs demolished</p>	<p>Support noted.</p>
44	<b>Daniel Cooper</b>			<p>I understand there is a deadline upcoming for residents' comments on the Public Houses consultation process. I have lived in Markham Street for two years and find the local public houses to be an invaluable amenity for the community, drawing together residents from different walks of life and creating a sense of shared interests.</p> <p>My concern is that, if these pubs (The Phene etc) are turned into expensive residential dwellings, we will end up with some dormitory enclave for the super-rich, much like Knightsbridge or Belgravia has become, and lose the sense of social fabric and associated benefits that make living in Chelsea so special.</p> <p>I urge you to do everything at your disposal to prevent these pubs falling into the hands of residential developers who are inevitably concerned with making a quick profit.</p>	<p>Support noted.</p>
45	<b>David Waddell</b>	Cheyne Walk Trust		<p>I write as Chairman Cheyne Walk Trust (a resident' association for Chelsea Riverside of some 180 members by subscription) to support the overall policy objective to seek to resist the conversion of public houses to residential use through primary or supplementary planning guidance.</p> <p>The Trust endorses and supports the comment submitted by the Chelsea Society and the Kensington Society.</p> <p>In particular we would support the desire to retain public houses of character in residential areas, especially where they provide the scope and/or facilities for community and social activity that may serve to enhance social mixing and a sense of local identity.</p> <p>We recognise that Public Houses in residential conservation areas are likely to be at particular risk since frequently they will offer the greatest value enhancement if converted to residential use. Since such public houses are generally also alone in providing for such residential local areas, particular care should be taken to preserve their existing use.</p>	<p>Support noted.</p> <p>With regard the "improvements" proposed by the Kensington Society:</p> <p>In terms of the changes needed public houses whilst it is acknowledged that public houses are social and community uses they have not been added to the list as part of paragraph 30.3.4 as they will not be appraised as part of Policy CK1. However, it is acknowledged that to avoid confusion they can be added to the list but it will be made clear that they will be appraised under amended Policy CK2, not CK1.</p> <p>The proposed paragraph 30.3.14A is not considered to be required – it is acknowledged in the draft reasoned justification to the policy that the number of public houses has seriously declined over the last 30 years and the evidence shows that the number being lost has increased in the last year. The figures are constantly changing so the proposed paragraph could be come quickly dated. In any case, it is not considered to add anything more to the policy. No change is proposed.</p> <p>In terms of marketing it is acknowledged that this is a material consideration. However, it has wider implications than just the policy regarding public houses</p>

					<p>so a reference to marketing is likely to be included in the changes being made to the 'Fostering Vitality' chapter of the Core Strategy – it will therefore be able to cover a wider number of uses than just public houses. A practice note will be produced that gives the requirements.</p> <p>With regard the comments made by the Chelsea Society:</p> <p>In terms of more explicitly stating the benefit of public houses as social and community uses as part of Policies CL1 and CK2 the reasoned justification for Policy CL1 deals more with the contribution of the use of a building to the character of an area - this may not necessarily be a social and community use so it would be inappropriate and confusing to include a specific reference to it. No change is proposed.</p> <p>With reference to Policy CK2 public houses will be added to the list of social and community uses but it will be made explicit that they are addressed by revised Policy CK2 rather than CK1.</p> <p><b>Character and Use Policy</b></p> <p>The proposed change to the policy is not supported. To resist a change of use of a property because it might be of convenience to residents or offers scope for social and community activity is far too wide ranging and open to interpretation. The policy would no longer be effective, and therefore sound. No change is proposed.</p>
46	<b>Simon Reid</b>	North West London PCTs		<p>NHS Kensington and Chelsea is the primary care trust for the borough. It currently discharges its duties through joint arrangements with NHS Hammersmith &amp; Fulham and NHS Westminster. Our public health duties mean that we have a role in ensuring that improvements are made against wider factors that affect health and wellbeing and health inequalities - factors including good housing, healthy living environments and sustainability.</p> <p>The Council's ambition to preserve the ability of local residents to walk to local amenities is vigorously supported from a public health perspective. The wider benefits of walking friendly environments and walking to both 'people' and 'place' are extensive and far reaching. These benefits include:</p> <ul style="list-style-type: none"> <li>- Walking reduces the risk of all-cause mortality by up to 20% and cardiovascular disease by up to 30%</li> <li>- Residents in walking friendly neighbourhoods are less likely to report depressive symptoms and poor mental health</li> <li>- Walking friendly environments are associated with a number of social benefits including increased social interaction, the development of social capital and increased safety.</li> <li>- Specific groups such as children and older people, who are often more reliant on their local neighbourhoods can gain significant health benefits and independence through walking</li> </ul> <p>Sadly, walking in built up urban areas is not without its risks and serious pedestrian injuries in Greater London appear to be increasing -- in 2011, 77 pedestrians were killed (up 33% on 2010) and 903 were seriously injured (up 6% on 2010). If this trend continues, walking to local shops and services may not be seen as an attractive option for some residents and visitors.</p> <p>Part of the rationale for this policy is to preserve local amenities (which provide a wider social role) so that residents can walk to them. We believe that the policy would be more effective if it makes explicit the links between urban development and walking friendly environments. This could have the added benefit of promoting closer joint working on one of the Councils strategic objectives in its Core Strategy (December 2010) -- offering better travel choices.</p>	<p>Support for protection of public houses is noted.</p> <p>The Core Strategy recognises the value of walking. However, we do not considered that it would be appropriate to include a specific policy on the need for 'safe routes' to walk to local amenities. This applies to all uses, not merely public houses. Policy CT1 (in Better Travel Choices) considers the topic, with criterion (g) noting that the Council will "require improvements for the walking environment."</p>



					We therefore recommend that your policy on the protection of public houses should include a bullet point in Policy CL 1 along the lines that the Council will favour developments that enable residents and visitors to safely walk to local amenities and resist any development that reduces safe routes for residents and visitors to walk to local amenities.	
47	<b>Stephen Griffiths</b>				As a long time practicing Architect in RBK&C I would like to register my strong opposition to the change of use of public service premises to residential. The overwhelming opposition to the proposal to change the use of the Cross Keys public house demonstrates the strength of feeling among the residents of Chelsea. I trust the Planning Authorities would reflect this in their forth coming deliberations.	Support noted.
48	<b>G Taylor</b>	West London Residents' Association			Our Residents Association fully supports the Council in its Draft Planning Policy for the protection of public houses and draft planning policy relating to use and character of June 2012.  In our view the implementation of this policy for public houses and other buildings would help preserve the character and residential amenity of the neighbourhoods where these buildings are located.  A very welcome step.	Support noted.
49	<b>Eva Skinner</b>	Onslow Neighbourhood Association			On behalf of Onslow Neighborhood Association I would like you to know that we are supporting Council's proposed changes to strengthen their policy to protect pubs, and that we support further improvements proposed by the Kensington Society	Support noted.
50	<b>Andy Goymer</b>	Environment Agency			No comment	
51	<b>Teresa Gonet</b>	Highways Agency			No comment	

52	<b>Mathew Oakley</b>	Royal parks			No comment.	
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