



## THE CHELSEA SOCIETY

# COMMENTS ON THE PARTIAL REVIEW OF THE RBKC LOCAL PLAN

*The Chelsea Society is a registered charity, which was founded in 1927 to preserve and improve the amenities of Chelsea for the public benefit. Today the Society has more than a thousand members.*

### SECTION 1.3 and SECTION 4 – CALL FOR SITES

There are many sites in Chelsea where buildings have been constructed, particularly between 1945 and 1980, which are drab and unimaginative and are not consistent with the quality of the built environment in Chelsea. The quality of the architecture and of the materials is poor, and they should all be demolished and rebuilt.

The Chelsea Society is compiling a list of these sites, which will be published on its website in due course. For the present we will mention the disused Thamesbrook care-home overlooking Dovehouse Green, the Fire Station nearby, and the block of flats and offices above Sloane Square Underground Station.

The Thamesbrook site is fortunately soon to be demolished and replaced by a new residential facility for the elderly, and the Society is working with the new owners and their architect to help design a building which will be a credit to its owners and an enhancement of this important site. The fire station should be replaced by a mixture of shops, offices and flats, and if possible a new fire station, a post office, and a police station. The site above Sloane Square station should continue to be used for offices and flats, or for an hotel.

### SECTION 2 – VISION AND STRATEGIC OBJECTIVES

Local Plans should be aspirational but realistic, and they should address the spatial implications of economic, social and environmental change.

Our vision is that 10 years from now Chelsea should be substantially the same as it is today with the same style and character, with the same village atmosphere, and with rather less noise, dust, disruption and pollution caused by building works and their associated traffic.

The Chelsea Society spent nearly a year consulting its members and other interested parties to prepare a statement of its vision for the future of Chelsea. It was debated at a public meeting and was adopted by the Council of the Society on 16th November 2015. It will be found on the Society's website at <http://chelseasociety.org.uk/the-future-of-chelsea-whats-next/>

The Chelsea Society will seek legislation to redress the balance between those who make financial gain from development, and those whose quality of life, including their health, is damaged by noise, vibration, pollution and traffic, often for extended periods. This is acute in Chelsea in the case of basements, and the Society has responded to the Government's call for evidence

<http://chelseasociety.org.uk/basement-developments/> We have made four points: 1. That there should be no right to excavate a basement without planning permission (This has been dealt with by



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the High Court in *Eatherley v LB Camden* (2016), and in RBKC by an Article 4 Direction) but should be put beyond doubt by a statutory amendment, 2. That double or multiple basements should not be permitted (This has been dealt with in Chelsea by RBKC Policy CL7 but double basements are still permitted where one exists), 3. That basement excavations should not be allowed under gardens (currently RBKC policy CL7 limits this to half the garden), and 4. That local authorities should have power to prevent more than one basement development in the same street at the same time.

We will also expect the Council to take promptly all legal action necessary to protect local residents and businesses. It should not be left to local people to enforce their own legal rights in relation to neighbouring developments, because the costs and risks involved in litigation are unsustainable for most people.

Successive governments have permitted, and seem likely to continue to permit, almost anyone who can afford to do so to come to Chelsea from anywhere in the world and buy or rent a house or flat here. This is completely unsustainable. It is perhaps the most powerful factor promoting change in Central London today and impacting acutely upon the community of Chelsea. If this trend continues it could soon be impossible to maintain anything like Chelsea as we know it, and everything in the Local Plan must be seen in that context.

### SECTION 3 – PLACES

There are two areas in Chelsea which have a distinct character and which in the Society's opinion should be designated as "Places" for the purposes of the Local Plan. These are:

1. the Thames riverside between Chelsea Bridge and Chelsea Creek, to a depth of 300 yards inland from the centre of the river, and
2. the cultural corridor commencing at the Cadogan Hall and including the Royal Court Theatre, the Saatchi Gallery, the Royal Hospital, the National Army Museum, and the Chelsea Physic Garden.

It would be a welcome addition to the public realm if the Royal Hospital authorities would open to pedestrians the central avenue of Burton Court, leading from Royal Hospital Road to Royal Avenue. Also, the unsightly recycling bins opposite the main entrance to the Royal Hospital should be moved to a less obtrusive location, and where it is easier for cars to stop.

A part of Chelsea which finds itself under acute pressure is the Lots Road area, and The Chelsea Society supports the submission in this Partial Review made by the Lots Village Chelsea Association.

### SECTION 5 – INFRASTRUCTURE

The Society welcomes the major works being done to improve the rainwater and sewage drainage systems and to replace the ageing gas-mains. Inevitably these works cause disruption but they are essential, and we commend the Borough Council and the contractors for the efforts they have made to keep to a minimum the disruption of traffic during the gas-main works.



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We would expect the Council to require sustainable drainage and sewerage systems for all new developments.

We wish to retain the Royal Marsden and the Royal Brompton hospitals in Chelsea, as well as our general hospital, the Chelsea and Westminster, and the private hospitals and other providers of medical and dental services. We understand the need for the Royal Brompton to improve its facilities, but we have some concerns. See <http://chelseasociety.org.uk/brompton-hospital-community-liaison-group/>

We urge the Council to encourage the creation of a Chelsea Medical Campus on a dedicated site linking the activities of the Royal Marsden and Royal Brompton Hospitals, Imperial College, and their research institutes into one international centre of medical excellence.

### SECTION 6 – SHOPS AND CENTRES

On the King's Road and the Fulham Road, the Council's professed approach and the reality are very different. It is said that retail is the number one reason why people visit the borough, and the Council believes that "the 'King's Road will remain one of London's iconic and vibrant shopping streets, containing a lively and diverse mix of shops and restaurants." However, they acknowledge that the number of independent shops has declined, and some 70% of all retail floorspace in the east of the King's Road and 40% in the west is now occupied by multiple retailers. We are concerned that after the forthcoming increase in business rates there will be even fewer independent shops.

Furthermore, we are told that the "Fulham Road will remain an essential centre providing for the daily needs of local people, while offering a variety of high quality specialist shopping. Monitoring of the food and drink uses will be undertaken to ensure these uses do not undermine its function as a neighbourhood centre." We are however concerned by the preponderance of coffee shops, cafés and restaurants between Redcliffe Gardens and Drayton Gardens (on both sides of the Fulham Road). We have noticed the steady shift away from the small independents offering specialty services and variety. Where is the "retail diversity from which the residents currently benefit" and which the Council say will be maintained and enhanced?

The Partial Review describes the eastern part of the King's Road (14.2) as if it were exclusively composed of large international chain stores. This is not the case. It is indeed different in character to the western part, but it is still more mixed and varied than the plan acknowledges: it is certainly not comparable to Kensington High Street.

There are many shops selling luxury goods, and there is a place for them. Some of the shops are very attractive, and their owners are to be commended. However there is no Post Office on the King's Road between World's End and Sloane Square, and we believe that the Borough Council should encourage the establishment of a Post Office in the eastern part of King's Road. Cadogan are to be commended for creating in Pavilion Road a cluster of small independent shops selling high quality food and other goods. We would encourage our members and all other local people to use those shops, or we will lose them.

We wish to improve the quality of Chelsea's streetscape, clearing the clutter and controlling advertising, and driving up the quality of the shopfronts. However, there is no recognition in the Partial Review of the need to improve the flow of public transport at the northern end of Sloane Street. The plan identifies (12.3) the reduction of traffic domination and air pollution as one of the



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principles for the future of the area, but this is not reflected in the subsequent sections on either Priorities (12.4) or Delivery (12.5). The Society's position on the proposed changes to Sloane Street are at <http://chelseasociety.org.uk/sloane-street/>

Urgent measures are needed to reduce the high level of congestion and pollution on the King's Road, and Fulham Road, which is caused mainly by buses, taxis, and delivery vehicles. Restrictions on waiting and loading, especially at busy times, must be strictly enforced.

Congestion and pollution are of course two different things - we could have no pollution and worse congestion with electric vehicles if there were more of them, but the pollution issue is urgent and the health impacts are already evident. The aim should be to encourage drivers to move away from diesel and use petrol / hybrid vehicles as an interim step to electric vehicles. This initial step should include encouragement to use smaller capacity engines in urban settings, and plans are being made now for providing the battery-charging infrastructure for electric vehicles in Chelsea.

All buses will have to meet Euro VI standards by 2023 with either new or retro-fitted equipment, and we consider that taxis and delivery vehicles should meet the same standard in central London by 2023. A zone could use pricing to start with, and in due course a ban on the most polluting vehicles entering the zone.

The transition to a low-pollution city is clearly a very large task and it will take time. If the expectation is that transport will be electric then the full benefit of this comes from clean electricity generation. We have ambitious targets for this in the UK with an 80% reduction of emissions by 2050 being the government target. We already have 25% of our power produced from renewables and this figure will rise. It is correct that some of the current electricity-generation causes pollution at the power-station but we should be looking forward.

### SECTION 7 – BUSINESSES USES AND HOTELS

Although Chelsea is within easy reach of many thousands of business premises, the Society wishes to encourage the provision of more non-retail business premises which are affordable and where local people can work.

In relation to the Lots Road area, it is inadequate to say "the Employment Zone will continue to function ....." which implies that the Council no longer has an aspiration to ENHANCE the only Employment Zone in Chelsea. In fact this valuable business cluster should be expanded and reinforced by providing more space for independent businesses. Chelsea Riverside Ward is the third most densely populated ward in RBKC and only 65% of the economically-active age group are in work or looking for work.

Chelsea is reasonably well provided with small and medium-sized hotels, and we do not need any large hotels. The Cadogan Hotel in Sloane Street will soon re-open, and the Society has supported a proposal by Cadogan to convert "The Mansions" in Sloane Gardens, close to Sloane Square underground station, into an hotel. <http://chelseasociety.org.uk/hotel-1-sloane-gardens/>



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The Society wishes to retain Chelsea's traditional pubs. We have helped to save the "Cross Keys" and "The Phene" and we are working to re-open "The Queen's Head" in Tryon St. as a pub.

<http://chelseasociety.org.uk/queens-head-tryon-street/>

### SECTION 8 – ARTS AND CULTURAL USES

The Society supports The Chelsea Arts Club, with whom we played a cricket match on 7<sup>th</sup> September 2016. We value the Heatherley School of Fine Art, and we are working to support the London Sketch Club <http://chelseasociety.org.uk/sketch-club-threat/> We will encourage living artists to continue the great artistic traditions of Chelsea. We will cooperate with the Chelsea Arts Society and other artistic institutions, and will award prizes and hold exhibitions where resources permit.

We wish to encourage the Royal Court Theatre, The Chelsea Theatre, and the Finborough Theatre. We wish to retain the two cinemas in the King's Road, and have worked with Cadogan to improve their development plans for the Curzon Cinema <http://chelseasociety.org.uk/curzon-cinema-2/> We will do so with the owners of the other cinema on the King's Road.

### SECTION 9 – RAIL INFRASTRUCTURE

The Society's members voted by a substantial majority at its 2015 Annual General Meeting to oppose the construction of a Crossrail 2 line beneath Chelsea and a station on the King's Road. The Society's position on this important matter is at <http://chelseasociety.org.uk/crossrail-2/>

All references to Crossrail 2 in the Local Plan should be deleted.

We welcome the commitment of London Underground to improve the signaling systems and to introduce more new trains to provide greater capacity on the District and Circle lines. We also welcome their commitment to the restoration and improvement of South Kensington station, and we will work with The Kensington Society to encourage the highest standards of design and materials in this important Victorian building. By contrast we are disappointed that London Underground are spending scarce resources on cosmetic work to Sloane Square station, ignoring the Society's views on the appearance of the station, and failing to provide step-free access down to either of the platforms. Priority would be to the westbound platform, because there is a step-free change at South Kensington from westbound to eastbound trains.

### SECTION 10 – HOUSING

Chelsea is not just part of inner London indistinguishable from the rest. This small piece of land between Kensington and the river has by accident or design acquired its own peculiar reputation and charm. It has become a place of terraced houses and blocks of flats, of some high-fashion brands and some small independent businesses. It has a rich demographic mix and is home to both rich and poor who meet in the same shops, pubs and churches. It is this that turns the urban landscape – so often a metaphor for loneliness and alienation – into a rich and invigorating community.

Chelsea is one of the most densely populated parts of the United Kingdom, and there is simply no room for any substantial addition to its housing stock. By contrast there is much spare capacity in the outer-London Boroughs. In Chelsea there is scope for refurbishment of existing housing,



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including some of the social housing built in the early 20<sup>th</sup> century, provided that the social mix of the population is not significantly altered.

The policy of requiring large-scale developments to include provision for 35 – 405 affordable housing) is re-affirmed, but there is no explanation of why this requirement is rarely enforced in the case of developments in Chelsea, despite the stipulation (35.3.5.) that the alternative of off-site provision or financial payment must be “robustly justified”. The plan also envisages (35.3.8) that when *in lieu* financial payments are made, they will be used on the Council’s estate regeneration programme. This is surely wrong. If the affordable housing were being provided by the developer at the site in question it would be clearly visible as an addition to the overall stock. If the Council just uses the money for estate regeneration there is no certainty that any new affordable housing units will accrue.

Because land values in Chelsea are extremely high, any new residential accommodation tends to be out of reach of local people, and is bought or rented by the very rich, often from foreign countries. Chelsea does not need any more blocks of flats built or converted for that purpose. We will normally oppose change of use to residential from any other use-class, and from community use to offices, without very good reason.

The only people in Chelsea who have any protection from these market forces are the residents of Council and Housing Association properties, and the Society will try to maintain that protection so long as we can. The Society’s position on the Affinity Sutton Estate is at <http://chelseasociety.org.uk/affinity-sutton-estate/>

Chelsea already has an optimum daytime and night-time population, and we would not wish to see any significant increase or diminution. Any significant increase would place further pressures on housing, education, transport, car-parking, air-quality, office space, open spaces, and on the public utilities. Diminution would affect the viability of small businesses and would weaken the sense of community in Chelsea if more dwellings remain empty for most of the year in addition to the ones already unoccupied at weekends by people who have a second home outside London.

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10<sup>th</sup> December 2016