

KENSINGTON AND CHELSEA NEW LOCAL PLAN REVIEW

RESPONSES TO THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Matter 3: Vision, Objectives and Spatial Strategy

Wednesday 21st June

Q 31. On what basis has it been decided that individual policies are strategic, and others not, as defined in Appendix 3 of the Plan. Is this differentiation justified? Is it appropriate that some parts of an individual policy are identified as being strategic and others not, such as Policy GB13?

As has been the case with many London planning authorities since the introduction of the national neighbourhood planning framework, RBKC has defined the large majority of its policies as 'strategic'.

We question whether this approach adheres to NPPF paragraph 21 which states that *strategic policies are there to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.*

NPPF Paragraph 28 reads: *Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.*

We can understand the strength of the linkage between the Draft Plan's site allocations for the two Opportunity Areas, and the achievement of the Borough's demanding housing targets. This linkage is a 'strategic' issue for the Borough and a key matter for the Examination. But should each and every other Site Allocation policy be deemed 'strategic' given that several of the sites involved are small? (See also our representations under SA9).

Similarly, where new, detailed and largely untested policies are being introduced (as in the Green Blue chapter) the RBKC approach of defining the majority of these detailed policies as 'strategic' restricts the scope for fine-tuning and variation in any neighbourhood plan. Such fine-tuning may be needed, in the life of the new Local Plan, to take account of varying building typologies between different parts of the Boroughs.

We feel that this question merits brief exploration at a hearing (subject to seeing how RBKC respond to Q31). We suggest that a wider range of RBKC Local Plan policies could and should be deemed as 'non-strategic', to achieve conformity with the definitions as set out in the NPPF and as explained in National Planning Practice Guidance.

Any concerns by RBKC over possible loss of control over DM policies seems a limited risk. While non-strategic policies can be introduced via NPs (as has been the case with the StQW Neighbourhood Plan) this process involves sustained work and effort by a local forum along with a check at independent examination stage. A spate of unjustified attempts to vary Local Plan policies, as a result of wider range of Local Plan policies being deemed as 'non-strategic', seems unlikely.

St Quintin and Woodlands Neighbourhood Forum June 2023