

Supporting Report

Kensington Society: Outline Representations on the Notting Hill Gate Draft SPD

INTRODUCTION

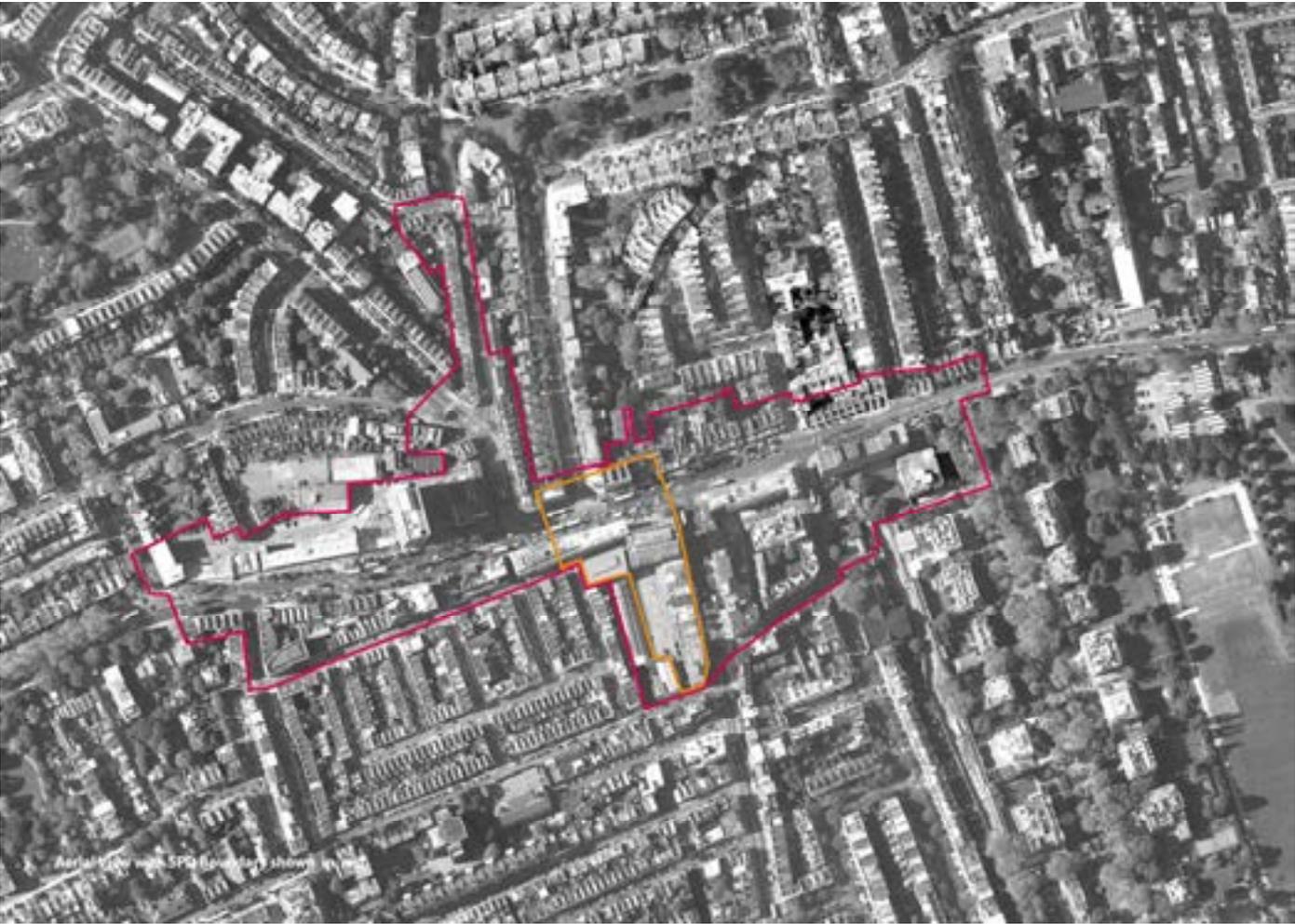
This Report has been produced by Malcolm Reading Consultants (MRC) on behalf of the Kensington Society with contributions from the Cherry Trees Association and the Campden Hill Residents Association. MRC have been advising the Society throughout the consultation period on the draft Supplementary Planning Document (SPD) produced for Notting Hill Gate (NHG) by the Royal Borough of Kensington and Chelsea (RBKC). This Report is not intended to be a design proposal. It is to be read in conjunction with, and is appended to, the formal representations of the Kensington Society on the draft SPD.

In essence, the key problem with Notting Hill Gate is the quality of its built environment (its buildings and the spaces inbetween). In this important regard the Society, together with its affiliated Societies, believe the draft SPD lacks ambition.

In order to address this lack of ambition within the draft SPD, and to focus on wider opportunities in the area, the Kensington Society believes RBKC should, as a matter of urgency, commission a masterplan for the wider SPD area. This will lead to an integrated approach to the whole SPD area, instead of being led by individual development sites, as the current draft SPD is.

As a result the Society has concentrated its comments on a suggested first phase of this future masterplan. This involves a zone including Newcombe House, Hobson House, David Game House, the London Underground (LU) substation and the Book Warehouse site (see area indicated in orange on the SPD area site plan). The remaining areas of the SPD area should be covered by the masterplan and should form a second phase SPD. The comments within this Report to the wider SPD area are, as a result, limited.

DRAFT SPD AREA

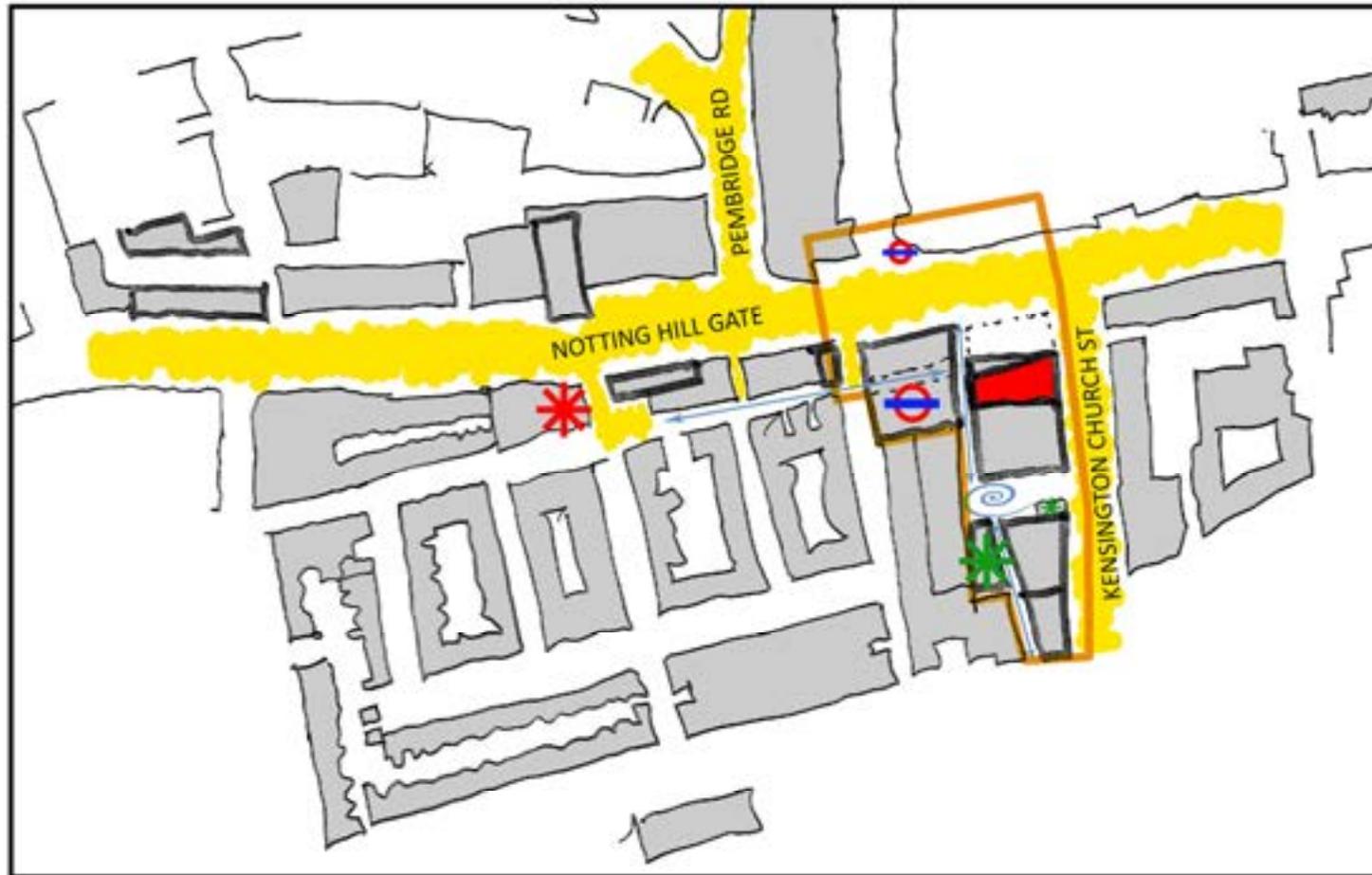


SUMMARY

The key concerns, and related opportunities, of the Kensington Society on the draft SPD are illustrated on the diagram opposite. To summarise, they are as follows:

1. A comprehensive development approach should be pursued for the Newcombe House, Hobson House, David Game House, LU substation and Book Warehouse site area (including Notting Hill Gate Underground Station) to ensure a higher design quality for this central site within NHG.
2. A new square, with pedestrian links to both Notting Hill Gate and Kensington Church Street, should be provided as a 'focus for community activity' within the Newcombe House development site.
3. A focus on a large cultural hub within the draft SPD, financed through Section 106 contributions, is vehemently opposed by the Society. A smaller, more community-based facility would be acceptable to the Society. This could perhaps be located within the Coronet and could be further explored at a later stage.
4. Linked to the new square should be vital community-based facilities focused on a new primary health care centre. This should be a holistic facility centred on a range of vital health facilities including a GP surgery and pharmacy.
5. Significant new improvements to Notting Hill Gate Underground Station, including priority on investigating new step-free access and ticketing facilities, which can be made as a result of the comprehensive development approach described above.
6. Public realm improvements throughout the SPD area should show significantly greater ambition and should focus on the main thoroughfares of Notting Hill Gate, Kensington Church Street and Pembridge Road.
7. Any requirement for tall buildings within the SPD area in general, and on the Newcombe House site in particular, should be of the highest design quality.
8. A clearer presentation is required of the priorities for Section 106 contributions within the draft SPD.

KENSINGTON SOCIETY – SPD AREA OPPORTUNITIES DIAGRAM



-  1. Comprehensive approach to Newcombe, Hobson and David Game houses, London Underground substation and the Book Warehouse site.
-  2. New public space as a focus of community activity.
-  3. Cultural Hub as a community based facility, perhaps located in the Coronet, delivered in a later phase.
-  4. Community based facilities including a new primary health care centre.
-  5. New facilities for Underground Station.
-  6. Public realm improvements to focus on main thoroughfares.
-  7. Tall buildings to be of exemplary design quality.

N NOT TO SCALE



1 – COMPREHENSIVE DEVELOPMENT APPROACH

The Society supports a comprehensive development approach to the Newcombe, David Game, Hobson House, LU substation (on Jamieson Street) and Book Warehouse sites. This has a greater chance of delivering a higher quality of new public realm environment than a more piecemeal, separate site solution.

This approach will also provide a greater opportunity for a genuine step change in the provision of new access and facilities at the Underground station (for further details see point 5). By bringing these individual sites together there is a greater critical mass of development potential that will provide the opportunity for greater community development gain (Section 106 contribution).

Under a comprehensive development approach the highest architectural quality can, and should, be demanded of the development. It should be a genuinely mixed use proposal including an appropriate mix of retail, offices and residential uses. A replacement tall building is acceptable to the Society (see point 7 for details) but it should not be excessively tall. Parking provision for residential units should not be provided as part of the development due to the close proximity of excellent multi-modal public transport links. Public 'pay and display' parking could be included within the development if this limits the density of development above ground on the site. As a minimum a small number of spaces could be provided to facilitate both the new community facilities on site and the weekly farmers' market.



2 – NEW PUBLIC / COMMUNITY SPACE

A good quality public space, a new square located within the demise of the Newcombe House development site, is central to the Society's requirements for the draft SPD area. This is missing from the draft SPD as it stands.

The draft SPD development principles for the Newcombe House development site propose a service accessed, pedestrian priority (but not pedestrianized), mews-type linear public space. It is the Society's opinion that this will not provide the '...public space that could be the focus of community activity' demanded of the public space within the draft SPD (see point 3.21 on page 14 of the draft SPD for details).

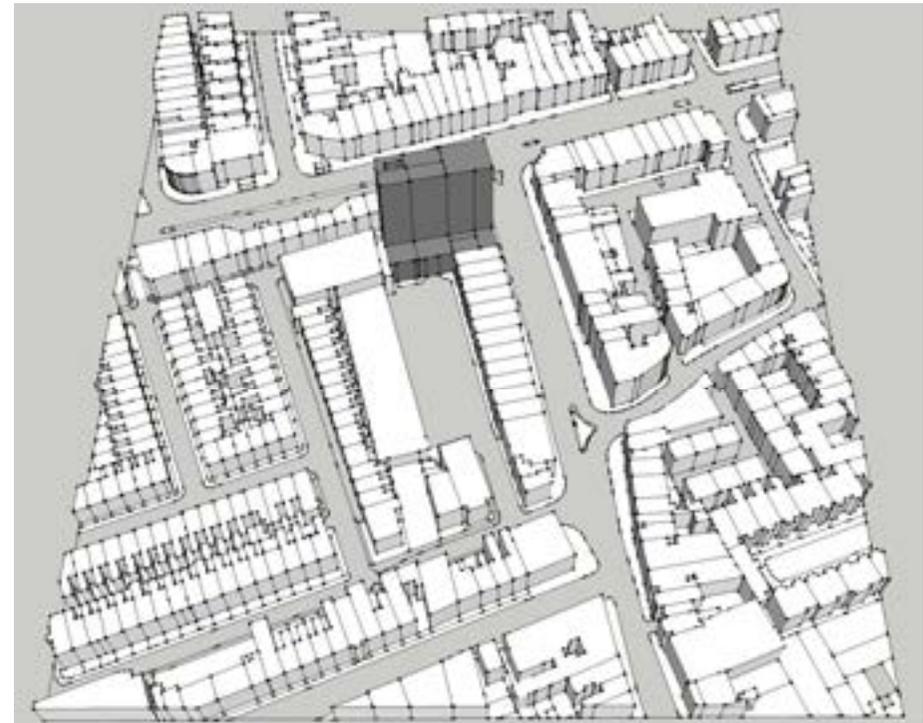
The diagram on Page 42 of the draft SPD (please see overleaf) shows a new public realm, in the form of a pedestrian priority mews street of circa 12 metres wide (dimension suggested by Penelope Tollitt in the consultation meeting on the 5th December 2013). The Society believes this is an inadequate solution. It provides a 'mews to nowhere' from NHG to Kensington Place, cutting off pedestrian access to Kensington Church Street. The development principles for this site within the draft SPD provides vehicular access (at least along part of its length) and it proposed double-sided or back-to-back retail units, which are not practical for retailers and present a security problem. This potentially presents confusion over shop frontage and back of house facilities.

The Society recommends to RBKC that they amend the public realm guidelines for the Newcombe House site. The Society prefers a hybrid solution of pedestrianised lanes leading to a public open-air square of approximately 600m² similar in size to the new Lancer Square Park proposed within the Borough. The square will link directly onto Kensington Church Street. This new space has been sited to the south of the site to prevent significant over-shadowing and the effects of potential high winds generated by the proposed tall building within the site. Any public space provided to the north of the tall building should be designed more akin to a winter garden, as suggested in the draft SPD.

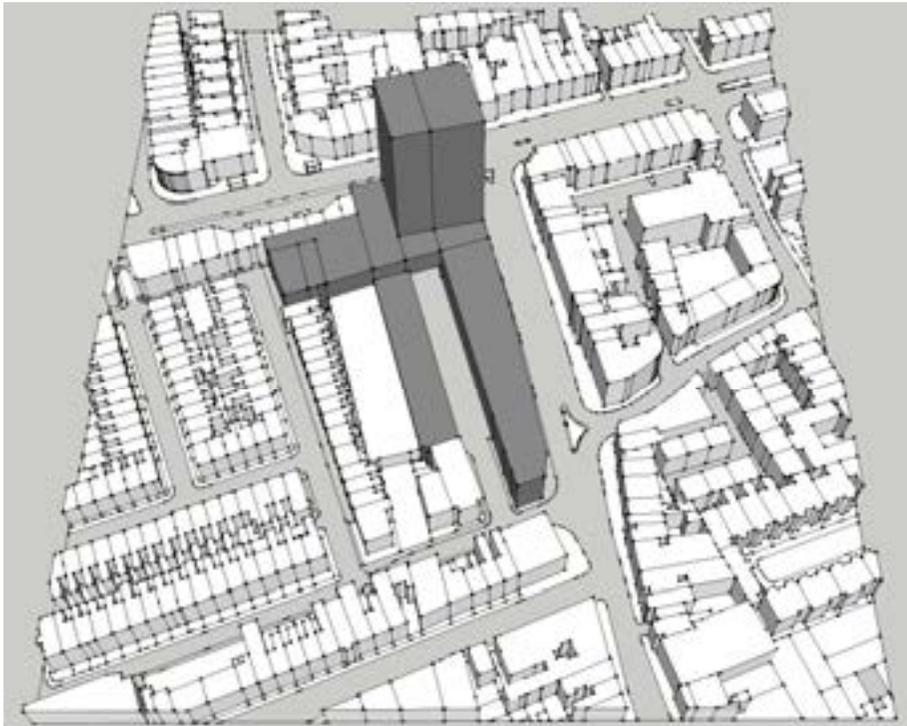
This mixed public realm of pedestrianized streets/lanes and a square, which partly fronts onto Kensington Church Street, will provide both a greater opportunity as a focus for community activity together with a new network of pedestrian friendly routes. The new square should focus on a new community hub and related facilities (see point 4 for details) and therefore should be genuinely public and not given over solely to commerce and retail. Ideally it should be adopted by RBKC. In dimensions it is similar to the current street and podium level plaza to the front (north) of Newcombe House. All servicing should take place from Kensington Church Street negating the need for vehicular access along the new public space. The pavement along the eastern side of Kensington Church Street should be widened to provide retail opportunities along the street. Relocating the weekly farmers' market within this new public space would help to provide the appropriate 'community focus' for the space demanded by the draft SPD.

COMPARISON DIAGRAMS OF THE NEWCOMBE HOUSE DEVELOPMENT SITE

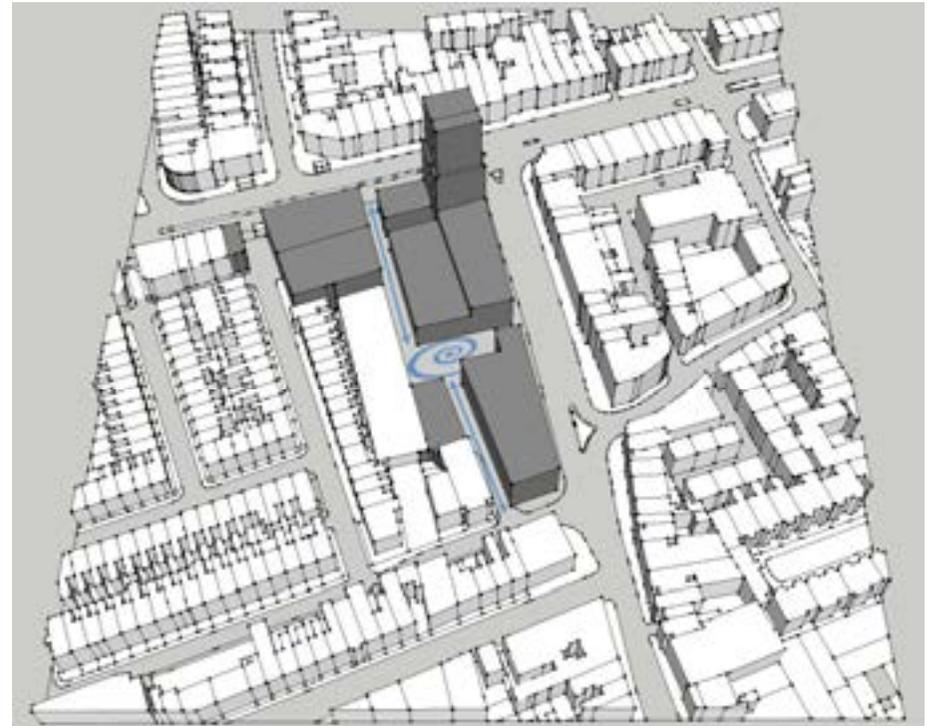
These simple massing diagrams show what the Kensington Society are calling Phase 1 of the SPD. They help to compare the massing and public realm with that proposed in the draft SPD and the Kensington Society's preferred solution.



EXISTING PUBLIC REALM



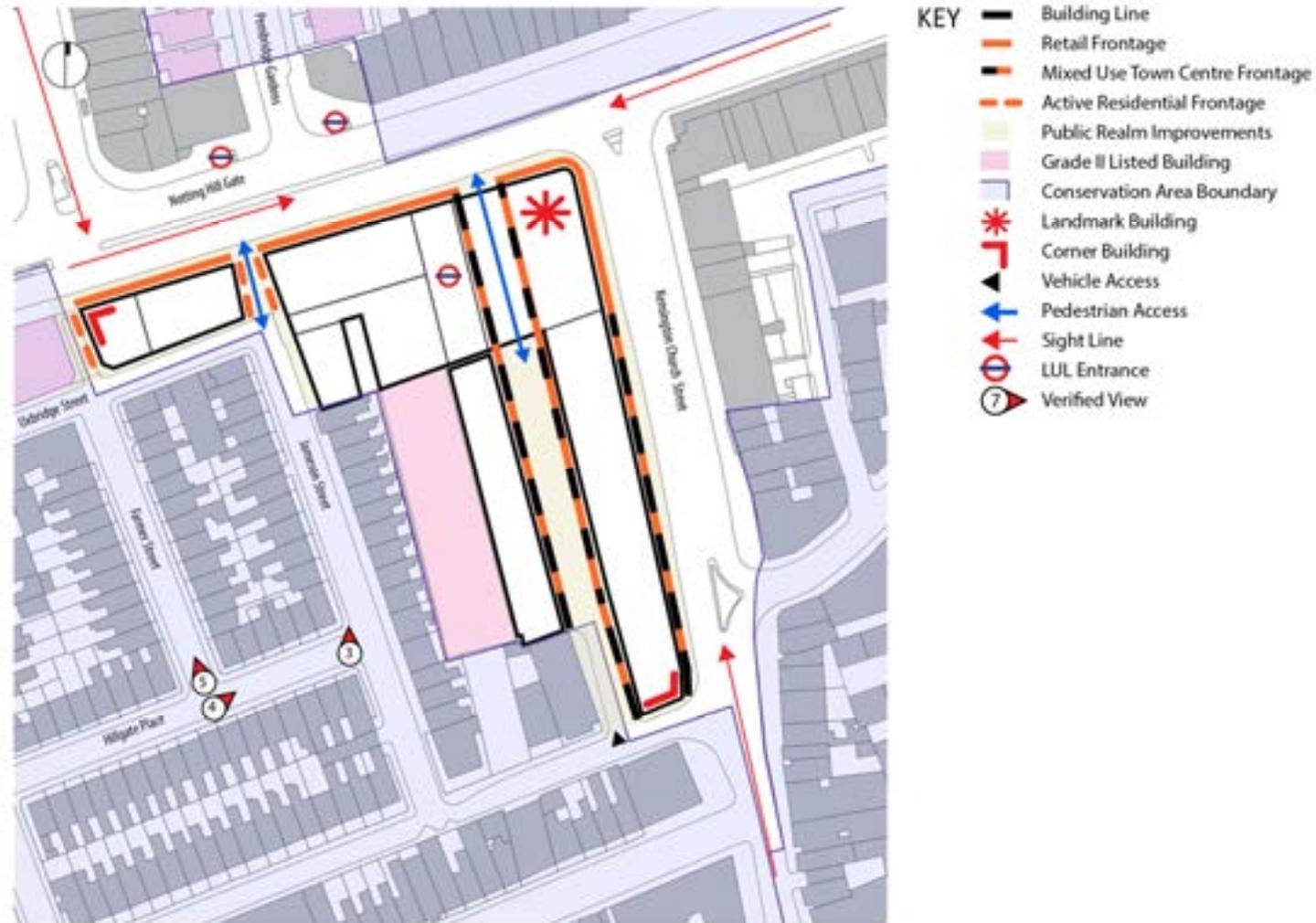
DRAFT SPD PROPOSED PUBLIC REALM



KENSINGTON SOCIETY PREFERRED PUBLIC REALM

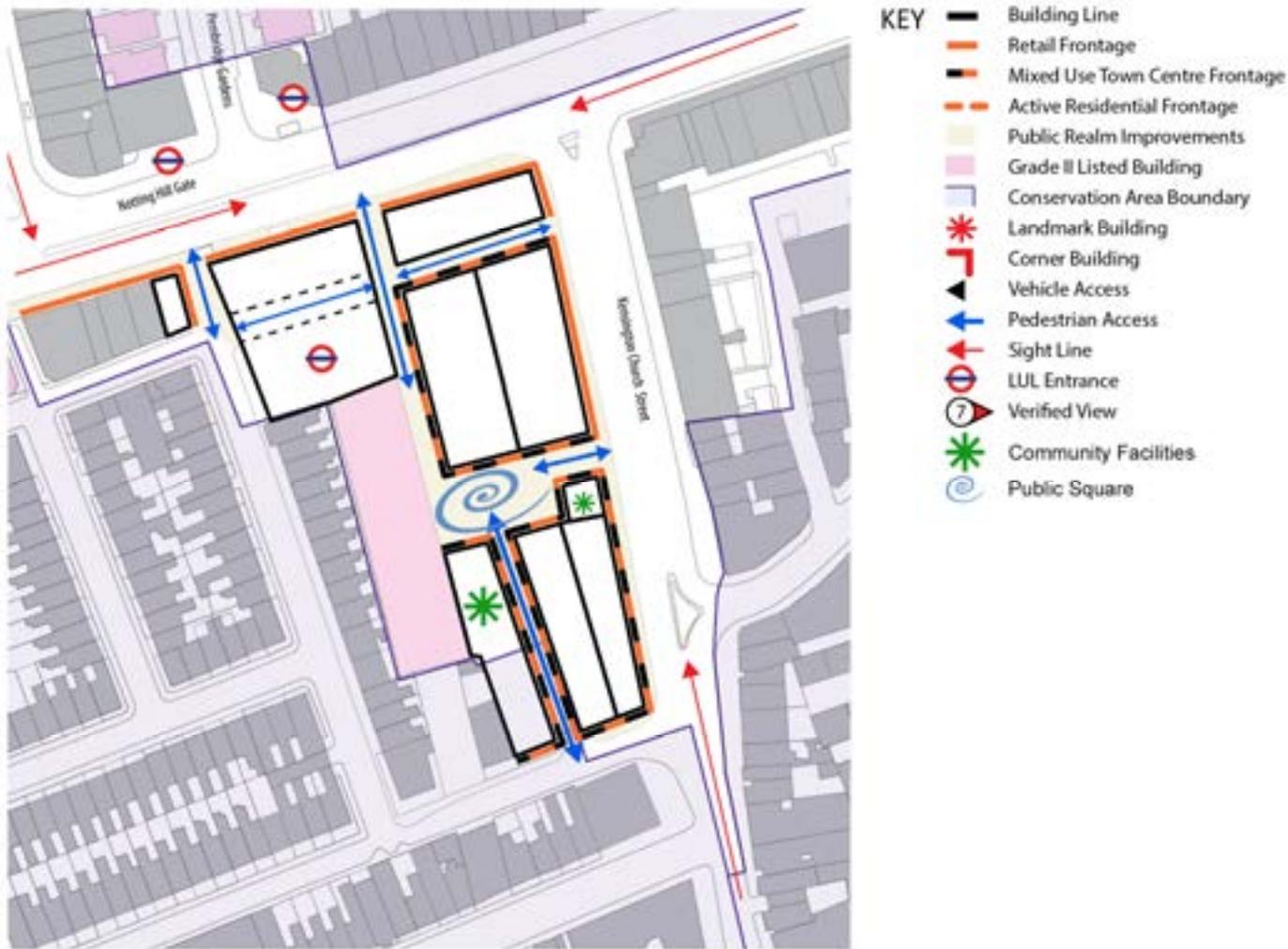
NEWCOMBE HOUSE DEVELOPMENT PRINCIPLES PLAN – FROM DRAFT SPD

Reproduced from the draft SPD, page 42.



NEWCOMBE HOUSE DEVELOPMENT PRINCIPLES PLAN – REVISED KENSINGTON SOCIETY PREFERRED PROPOSAL

The Kensington Society's preferred layout for the Phase 1 development within the SPD.



PUBLIC SPACE ANALYSIS DIAGRAMS

In the following diagrams we compare the current Newcombe House public space area (red, circa 400m²), the proposed mews space within the development principles for the Newcombe House site as illustrated in the draft SPD (blue, circa 2,000m²) and the Society's preferred public realm mix (green, circa 2,100m² overall with a 600m² central square) at the same scale, and in relation to, some well-known and successful publically accessible spaces in London and beyond.

PUBLIC SPACE ANALYSIS DIAGRAM – DUKE OF YORK SQUARE

Duke of York Square is a space that should be well known to most within the Borough. The Society's preferred layout is not dissimilar being a mix of lanes and spaces. The focus, however, should be very different at NHG concentrating on community rather than retail uses.

NEWCOMBE HOUSE



EXISTING PUBLIC REALM



SPD PROPOSED PUBLIC REALM



MRC 'PROPOSED' PUBLIC REALM

DUKE OF YORK SQUARE



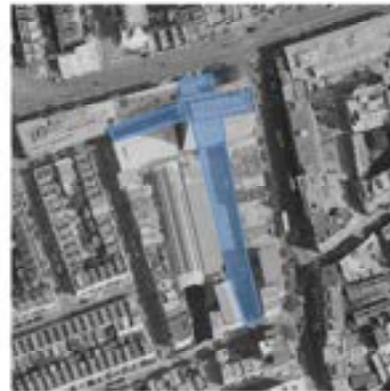
PUBLIC SPACE ANALYSIS DIAGRAM – PALEY PARK

Paley Park, in New York, is a highly successful and well used public square. It is surrounded by tall buildings and busy streets. Its size is comparable to the existing public realm in front of Newcombe House. Paley Park proves the successful public spaces do not need to be large.

NEWCOMBE HOUSE



EXISTING PUBLIC REALM



SPD PROPOSED PUBLIC REALM



MRC 'PROPOSED' PUBLIC REALM

PALEY PARK



PUBLIC SPACE ANALYSIS DIAGRAM – SLINGSBURY PLACE

Slingsbury Square in Covent Garden is a new public space in London. Although retail focused it has a similar morphology to that preferred by the Society with a pedestrianized lanes leading to a central public space.

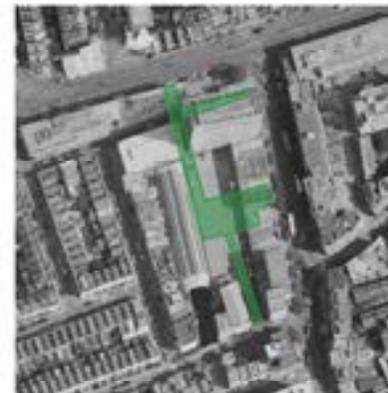
NEWCOMBE HOUSE



EXISTING PUBLIC REALM



SPD PROPOSED PUBLIC REALM



MRC 'PROPOSED' PUBLIC REALM

SLINGSBY PLACE





3 – CULTURAL HUB

The concentration on a large new cultural hub within the area is seriously questioned by the Society. Its focus appears to be to attract visitors to the area rather than support the local community. The Society believe its need is not well justified in the draft SPD and its supporting documentation. The Society's concerns over the new cultural hub are as follows:

- Evidence of need, particularly at the scale suggested, appears weak.
- The drive for it appears motivated by external forces with limited consideration of local needs.
- How can RBKC ensure that the facility will not become another failed project and therefore a huge 'white elephant' for NHG?
- The wish to enhance the creative industries in the area is a good one, but this could be achieved by attracting creative businesses to the area instead of building a new creative facility.
- Why should a large proportion of the potential Section 106 monies be spent on a facility that is likely to be privately run and is of national, not local, significance?

Primary in its objections, however, is that the Kensington Society vehemently opposes the facility receiving any public monies to be built. As a significant Section 106 contribution is anticipated, this is a huge opportunity cost estimated currently at £8M. This has the potential to significantly distort what development can take place on the Newcombe House site specifically, and within the draft SPD area in general. The money saved should be directed towards the public space and facilities.

There are also serious doubts over the need for a new cultural hub building in the area at all. However a smaller, more community focused space may be an acceptable trade-off to the Society. The size and ambition could perhaps be reconsidered for the new cultural hub to provide a facility more in-keeping with other spaces in the vicinity and to meet local, as well as visitor, needs. The Society believes that the opportunity presented by the potential sale of the Coronet on Notting Hill Gate could present a way forward for the development of a new community-based cultural facility within the SPD area. The Society urges RBKC to review the feasibility of this as a matter of urgency.



4 – COMMUNITY FACILITIES

Community facilities are described in only limited terms within the draft SPD. The Society believes that the cultural hub, if provided, and the new public space should both have a community focus (see points 3 and 2). Each should have a 'district centre feel', with community facilities catering primarily to local needs.

The suggested provision of a Primary Health Care Centre within the SPD area is strongly supported by the Society, particularly since the loss of the surgery on Kensington Place and the threat to Holland Park Surgery. This could be provided as a focus within the Newcombe House development.

This central NHS Centre should look to provide a holistic facility within the SPD area, including a GP surgery with associated pharmacy, therapy (if possible), x-ray, minor surgeries, laboratory and blood-testing facilities. Additional community 'health' services could also be provided, such as a community gym. It should also be associated with pay and display parking for the elderly and disabled (see point 1 above for further details).



5 – NOTTING HILL GATE UNDERGROUND STATION

We believe genuine improvements could be made to Notting Hill Gate Underground Station, including improved access and ticket hall facilities, by pursuing a comprehensive development approach to Newcombe House and adjacent sites (see point 1). The existing station has poor accessibility, with four narrow staircases accessing the basement level ticket hall that sits underneath NHG adjacent to Pembridge Road.

If a comprehensive development approach is pursued then the Society feel there is a genuine opportunity to make a substantial and accessible station at Notting Hill Gate to accommodate the circa 17 million users the station attracts annually. Although improvements to the Underground station are noted in the draft SPD these should be far more ambitious than currently stated.

Improvements are likely to focus on the south side of NHG where an extensive new entrance building to the Underground station could be provided. This could include new facilities such as a large ticket hall and perhaps public WCs as well as facilitating step free access to the station concourse.

The north of the station also suffers major congestion, particularly on a Saturday with visitors to Portobello Road Market. The SPD should also look at incorporating a new entrance within the Book Warehouse site development. This development could 'absorb' a new entrance building to the station thereby reducing congestion along the pavement. Improvements could also be made at the existing ticket hall level to improve facilities and reduce congestion further.

The Society is clear, however, that improvements to the Underground station should be predominantly financed by Transport for London (TfL) and not solely through developer contributions.



6 – GENERAL PUBLIC REALM IMPROVEMENTS

The Society believes that the plans for the public realm as set down within the draft SPD lack ambition. A potential vision for how NHG could be in the future has already been delivered within the Borough. For example, High Street Kensington was updated around ten years ago and could be seen as a quality benchmark for NHG, with its focus on de-cluttering and emphasis on good quality and coordinated materials and street furniture (please see the before and after images overleaf). A reduction in vehicular traffic dominance, in conjunction with a more pedestrian-friendly environment, is also supported by the Society.

The Society believes that extensive public realm improvement works should be completed regardless of any proposed developments within the SPD area. Although these improvements are an integral part of the overall strategy for transforming NHG, it should not be dependent on the development of specific sites. Therefore funding should not be through Section 106 monies alone and should be sought from other sources such as RBKC's parking reserve and TfL.



High Street Kensington as it was (left) and after transformation (right).

Generally, the Society support public realm improvements to the main thoroughfares of Notting Hill Gate, Kensington Church Street and Pembridge Road, including improvements to traffic and vehicular movements and flows. However there are concerns over the public realm improvement proposals within the draft SPD, including:

- Loss of short-term parking spaces along NHG itself. If lost any re-provision of these spaces must be provided within the Newcombe House site.
- The public realm improvements proposed to 'backland' areas, such as behind Astley House and M&S, are not critical. The Society does not support spending public monies on improvements to these areas, in particular Rabbit Row/West Mall and the service/parking areas behind Ivy Lodge all the way to the West Block.
- The re-siting of the bus stop from Pembridge Road to NHG would appear to exacerbate congestion along NHG.
- The public realm must address the needs of both vehicular and pedestrian traffic movements on Saturdays, particularly to Portobello Road Market.
- The lack of high-quality wayfinding and correctly located crossings.

Public art should also be a focus of the coordinated public realm improvements and the new public space noted in point 2, and should not be carried out in piecemeal fashion under each development site. A single public art manager/coordinator should be appointed, in a similar fashion to the Town Centre Manager, but only for the duration of the developments and should be supported through Section 106 contributions (see point 8). The area responsibility for both the Town Centre Manager and Public Art Coordinator should be the whole of the SPD area.

The Kensington Society are clear that site specific public realm improvements, those specifically located within a particular development site, should mirror the ambition, style and quality of the improvements proposed elsewhere in SPD area. To this end design guidelines for public realm improvements must be produced. The financing of these should be the responsibility of the individual developers. This should be discussed further once the masterplan has been completed.



7 – ARCHITECTURAL QUALITY AND BUILDING HEIGHTS

Both the Core Strategy and the draft SPD make note of the poor and unattractive design and architecture in much of the SPD area. The Society does not dispute this.

Although the draft SPD refers to proposals having high architectural quality it does not provide strong enough guidance and parameters on design and aesthetics, and coordination across development sites within the SPD area. The Society will be requiring this of the SPD.

The Society is not against tall buildings as part of the developments within the SPD area, although the draft SPD does seem to contradict the Royal Borough of Kensington and Chelsea's (RBKC) own Core Strategy and SPD on tall buildings. However, there needs to be public gain received for agreeing to a higher building than the current Newcombe House. The SPD area's adjacency to four conservation areas should also be considered when reviewing architectural quality and building height in developments brought forward within the draft SPD.

The Society will only accept tall buildings in the SPD area under the following criteria:

- The building(s) is/are of world class quality
- The proportions are elegant and slender
- An appropriate public space, as described in point 2 and as shown on the diagram on page 13, is provided as part of the Newcombe House development
- The siting of tall buildings is considered and tested against the provision of public space to minimise overshadowing, detrimental micro-climates and the like

8 – SECTION 106 MONIES

A table of contributions is included at the back of the draft SPD (see page 55). The Society believe that, although useful, this matrix is too simplified for the apportioning of contributions across the development sites.

The Society believe that the ambition, and related costs, associated within the new cultural facility as proposed within the draft SPD have the potential to drain public resources within the SPD area. If an £8M facility is provided, what other potential facilities and contributions are lost? A smaller, less ambitious, more community focused facility (see point 3) may be supported by the Society in conjunction with a reworked public space as part of the Newcombe House development.

Opposite is a re-working of this table taking into account all of the above additional points and issues raised by the Society, rating requirements in terms of priority.

8 – SECTION 106 MONIES – AMENDED TABLE OF CONTRIBUTIONS

Site	Public realm improvements to Notting Hill Gate, KCS + Pembridge Road	New public space	Cultural / Community Facility	Affordable Housing	Town Centre Manager	Public Art Manager	Primary Health Care Centre	Other Community Facilities	Underground Station Development	
Newcombe House	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	X	Considered Together
David Game / Hobson	✓	X	X	✓	✓✓	✓✓	X	✓	✓✓	
Substation (TFL)	✓	X	X	X	✓	✓	X	X	✓✓	
Book Warehouse	✓	X	X	✓	✓✓	✓✓	✓	✓	✓	
Coronet	✓	X	X	X	✓✓	✓✓	X	X	X	
Astley House	✓	X	X	✓	✓✓	✓✓	✓	✓	X	
West Block / M&S	✓	X	X	✓	✓✓	✓✓	✓	✓	X	
Ivy Lodge / Campden Hill Towers / United	✓	X	X	✓	✓✓	✓✓	✓	✓	X	

- ✓✓ Primary Priority
- ✓ Secondary Priority
- X Not Required / Minimal Priority

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