



# St Quintin and Woodlands

## CONSULTATION STATEMENT ANNEXE

Comments and representations on the St Quintin and Woodlands Draft Plan made during the public consultation from December 2nd 2014 to January 25th 2015, and responses from the StQW Neighbourhood Forum.

As submitted to RB Kensington and Chelsea Council May 2015



	<p>Road and experimenting with occasional temporary road closures in the section of St Helens Gardens opposite the church. I would also strongly support the <i>reinstatement of GP surgeries at ground floor level in the event that the St Quintin Health Centre is redeveloped.</i></p> <p>Many thanks for all the invaluable work you do on behalf of local residents. It is very much appreciated.</p>		
<p><b>Jeremy Barnard</b> <b>153 Highlever Road, W10</b></p>	<p>I write as a resident of Highlever Road W10 in support of the draft Neighbourhood plan for our area.</p> <p>In particular I support:-</p> <p>The proposal to protect the three backland open spaces originally forming part of the St Quintin Estate which provide an outstanding amenity to the residents.</p> <p>The proposal to relax onerous conservation controls on alterations to the rear of our houses.</p> <p>The proposal to allow mixed uses and stimulate development in Latimer Road which is currently a dead zone out of business hours, and a blight on the area.</p>	<p>Comments support 3 sets of proposals in the Draft Plan</p>	<p>Sections 2, 4 and 8</p>
<p><b>Tom Newman,</b> <b>StQW Neighbourhood resident</b></p>	<p>Land at Nursery Lane as Local Green Space - Concur with all identified spaces not just Nursery Lane.</p> <p>Plans to allow a range of uses other than offices in the Employment Zone sections of Latimer Road, including housing on upper floors of existing buildings and at any of the light industrial units 1-14 which choose to redevelop - Agree</p> <p>Proposed 14m guideline building height proposed for the western side of Latimer Road, from residents living on the eastern side - I think this needs to be restrictive only in proportion to the buildings that will be built in the Imperial development behind.</p> <p>Transportation - the key elements are changes to North Pole road traffic, the tunnel under the tracks through to the west and another station on the Overground. The quantity of other suggestions seem to dilute the focus.</p> <p>Sporadic Piazza on St Helens Gardens seems unlikely to bring more shops or critical mass.</p> <p>Use of space for more short term parking spaces could produce extra shoppers and create demand for more shops.</p>	<p>Comments support 4 sets of proposals in the Draft Plan with reservations on 8e on building heights in Latimer Road. This policy has been amended following discussion at the open meeting of the Forum on February 5th.</p> <p>An Action (7ii) rather than a Policy, discussed at the RBKC Streetscape Review. RBKC officers will look at options, prior to any consultation exercise on this proposal.</p>	<p><b>Sections 4, 8</b></p>
<p><b>Michael Kennett,</b> <b>Highlever Road, W10</b></p>	<p>I write as a resident of Highlever Road W10 in support of the draft Neighbourhood plan for our area.</p> <p>In particular I support:-</p>	<p>Comments support 3 sections of the Draft Plan with reservations on building heights in Latimer Road. This policy has been amended following discussion at the open meeting of the Forum on</p>	<p>Sections 2, 4, 8, 5</p>

	<ul style="list-style-type: none"> <li>• The proposal to protect the three backland open spaces originally forming part of the St Quintin Estate which provide an outstanding amenity to the residents and in particular the proposal to designate the land at Nursery Lane as Local Green Space</li> <li>• The proposal to relax onerous conservation controls on alterations to the rear of our houses while maintaining controls on the front elevations</li> <li>• The proposal to allow mixed uses and stimulate development in Latimer Road which is currently a dead zone out of business hours, and a blight on the area</li> <li>• Maintaining the diversity under the Westway structure e.g. the sports facilities and riding school</li> <li>• Investigate potential changes to the local road network to relieve the daily queues to exit North Pole Road</li> <li>• Investigate the 14m guideline building height proposed for the western side of Latimer Road and potential detrimental effect to the residents living on the eastern side of Latimer Road</li> </ul>	February 5th.	
<p><b>Mark Eden, 28 Brewster Gardens, W10</b></p>	<p>I have read the Draft Neighbourhood Plan and I confirm my support.</p> <p>In particular I support the proposals in the Plan to designate the Nursery Lane site a Local Green Space and the preservation of other open spaces referred to in the Plan.</p> <p>I am not opposed to all new development and appreciate the need for new housing but as proposed in the Draft Plan there are more appropriate locations in the neighbourhood such as Latimer Rd and the Crowthorne Rd site.</p> <p>As I live off the North Pole Road I believe changes in the road network are necessary to reduce the heavy traffic congestion leading up to Wood Lane/ Scrubs Lane Junction.</p> <p>Also an overground station at Western Circus would go some way to improving the sparse Public Transport amenities in our area.</p>	Comments support 3 sections of the Draft Plan	Sections 4, 5 and 10
<p><b>David and Jennie Marshall, Finstock Road, W10</b></p>	<p>Firstly, thank you for the most incredibly detailed and professional draft neighbourhood plan. It must have taken hours and hours of research, cross referencing and composition and we are enormously grateful for your expertise and hard work. The need for comments by tonight slipped under the radar but here they are just in time:</p> <p><b>2.8.3 Ground floor rear/side infill extensions:</b> "subject to Rights of Light or issues of "sense of enclosure" should also be added to the end of this paragraph (as well as stated in 2.8.1.).</p> <p><b>2.9.4 Garden studios and workrooms:</b> we strongly support the introduction of a specific neighbourhood policy on garden</p>	Comments support 5 sections of the Draft Plan	Sections 2, 4, 5, 7 and 10

	<p>outbuildings.</p> <p><b>2.10.2 Rendering and painting of rear brickwork:</b> the painting or rendering of rear brickwork should <u>not</u> become acceptable at any level, but particularly at upper level; it will destroy the cohesion of the estate. While we are sympathetic to the wall insulation issue, it is relatively easily added internally, and should not influence the design of the exterior.</p> <p><b>4a Backland open spaces:</b> we strongly support the preservation of these areas by designating them as Local Green Space (with regard to the Nursery Lane site <a href="http://www.mapesbury-dell.org/">http://www.mapesbury-dell.org/</a> is a great example of council/local resident cooperation - hugely beneficial to all).</p> <p><b>5.6.4 Overground station:</b> we strongly support the proposal to create a new overground station beneath the Westway elevated roundabout and the pedestrian cycle underpass.</p> <p><b>5i and 5ii Transport and Traffic:</b> we strongly support the need for an overall traffic plan and local road network plan to reduce the present congestion in North Pole Road and to take account of the proposed major developments in the White City and Old Oak opportunity area.</p> <p><b>7.2.1 St. Helen's Gardens proposals for the future:</b> we strongly support continuing experiments with road closure to create a piazza, especially as routing the traffic through the east end of Kelfield Gardens to the roundabout would have little detrimental effect to residents as it is along the side of the church. However the junction with St Helen's Gardens needs to be slightly adjusted to make the turn easier.</p> <p><b>8.10.1 Housing in Latimer Road:</b> we would like to see a detailed development plan for this area to include houses as well as studio/workshop accommodation and that 14m should be a maximum height for most buildings, but there are some places where the height could be several stories more without detriment to the neighbours.</p>		
<p><b>Jenny Harborne, RIBA Highlever Road resident and StQW management committee member</b></p>	<p>COMMENTS ON THE PLAN</p> <p>1 a) Local shops- North Pole Road needs red route designation and loading parking spaces provided on side streets during specific times for deliveries- reverting to P&amp;D or 10 minute stops after that.</p> <p>2d) do not understand the term <b>where the original external side passage is incorporated into the body of the house.</b> is this a reference to infill extensions? side passages suggest a passage from the street to the garden which I don't think is the intention?</p>	<p>An Action Point 7(i) in the Draft Plan asks that RBKC reviews the balance of residents and short-term parking around North Pole Road, Residents of Brewster Gardens and Bracewell Road are opposed to loss of resident spaces. Parking and loading/deliveries are not a 'planning or development' matter so cannot be covered by a StQW policy proposal</p> <p>It is not intended as a reference to 'infill' extensions filling gaps between terraces properties. It refers to the very common form of</p>	

	<p>2f) ADD Rear external insulated render  Due to following this measure should be contained in the plan-</p> <ol style="list-style-type: none"> <li>1. this was a 50/50 vote at a public meeting- we need the full neighbourhood to vote on it.</li> <li>2. there are increasing measures for fuel efficiency- Building Control requirements, grants...</li> <li>3. there are developments of thinner and thinner insulations,</li> <li>4. people want the freedom to paint rear walls and voted against that Article 3 being applied</li> <li>5. random rear walls are now painted</li> <li>6. painting obliterates brickwork as much as rendering</li> <li>7. insulated render is a simpler, cheaper and technically better method to improve household energy efficiency.</li> </ol> <p>4c) I support protecting the backland sites, and also those already developed, which need protecting - that those developments are not allowed to be intensified and further. (e.g. no extra floors onto the Family Centre)</p> <p>5 the cycle superhighway is a really poor idea and has no place in our local plan - as a cyclist I would be averse to using it on the grounds of being adjacent to increased traffic fumes, any accident would be significantly greater in that location, there are very good alternatives, for example the canalside route.</p>	<p>rear extension in the neighbourhood in which the external area between the 'closet' extension and the party wall is incorporated into the body of the house. It is accepted that 'passage' is an inaccurate term in this context and this policy will be reworded</p> <p>This issue was discussed further at the open meeting on Feb 5th. A large majority opposed the idea of allowing rendering of brickwork on the rear of houses, above ground floor level, on grounds of resultant harm to the appearance of the conservation area.</p> <p>RBKC policy CL2g on backlands '<i>requires the development of backland sites to ensure vehicular and pedestrian access is properly integrated into the surrounding street network and that the scale and massing respect the hierarchy of the existing urban block so as to enhance the character of the area</i>' This would seem to protect surrounding houses from any additional higher buildings on two of the backlands where development has previously been approved and built (St Quintin Childrens Centre and Blakes Close).</p> <p>The Mayor of London announced on January 27th 2015 that plans for the east west cycle superhighway would proceed. A total of 84 per cent of the 21,500 responses backed the plans for the east-west route. The StQW Draft Plan provides for the option of a 'cycle lift' on land at 301 Latimer Road to allow safe movement of</p>	
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	<p>5i) to help congestion North Pole would like to see proposals for the street to have red route designation and loading parking spaces provided during specific times for deliveries- reverting to P&amp;D after that.</p> <p>Also the cyclist needs a safe route though this congestion at The Triangle and it is a shame that no proposal is being forwarded in this ' Plan' for that.</p> <p>5 iii) I am against the Latimer underpass as it only benefits a small section of our area in terms of a shorter route to transport of Westfield, it is likely to cause problems of safety, security, parking. It will impact adversely on the tranquility of the area. This has been promoted as the way to improve Latimer Road but the proposed use class changes to allow residential will do that.</p> <p>5 b) I am for a new rail station but prefer the North Pole location.</p>	<p>cyclists on and off Westway and a location next to the proposed underpass connecting Latimer Road and Wood lane.</p> <p>StQW Policy 10a proposes that the undeveloped land at 301 Latimer Road should be allocated for transport purposes, including the possibility of cycle lift connections between Westway and the proposed underpass between Wood Lane and Latimer Road.</p> <p>The north side of North Pole Road has yellow lines, and other respondents to the StQW Draft Plan have pointed out that enforcement is weak. The StQW shopping survey showed that the shopkeepers oppose stricter enforcement, but would support more P&amp;D spaces for short term 'shoppers parking'. This is covered in Action 7(i) in the Draft Plan.</p> <p>Any such proposals, which would be viable in traffic management terms, would be welcome.</p> <p>A series of votes at open meetings of the StQW Forum have consistently shown majority support for the proposed underpass. A 2011 survey of its members conducted by the St Helens Residents Association showed a 2:1 majority in favour. Responses to the planning application considered by RBKC in November 2014 showed a similar balance of views (the application was deferred for further RBKC/LBHF consultation). The support to the proposed underpass in StQW Action 5(iii) reflects this majority view. The underpass is seen as important in helping to restore vitality to Latimer Road and in improving pedestrian/cycle connectivity for the whole of the StQW neighbourhood.</p> <p>Residents of Bracewell Road and Eynham Road oppose the North Pole location on grounds of</p>	
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	<p>Road safety traffic policies should include proposals to avert accidents at the Wallingford junction</p> <p>7. Change of use shop units- pop-up shops should be encouraged with low/no rental for trial periods- this will allow inventive uses a step up which may then be successful and specialty magnet shops (ie draw trade to the area) as they do in Soho...</p> <p>8i The design guidelines do need to be developed to allow Latimer Road to be developed in a harmonious way- and not replicate the free for all battle of styles at the southern end of the street. A recent Committee meeting threw this out as an impossible task, even though various local architects have suggested they would be willing to debate this. An alternative and expedient approach may be to opt for a style and give a few examples- the neighbourhood could vote which approach they will support. for example - modern contextually sensitive schemes sitting in Victorian areas. - ground breaking eco - pastiche victorian</p> <p>Once chosen we would ask the planners to only allow schemes which follow that design approach.</p> <p>I also think that this is a missed opportunity to improve the street landscape, to propose traffic calming measures and stop it being a rat run without transferring that to Highlever, introduce trees, alter the building line</p> <p>9 It would be extremely helpful to have a profile of where the residents work-</p>	<p>proximity to neighbouring houses and the noise impact of trains stopping and starting platform announcements etc. The 'Western Circus' location would adjoin the proposed underpass, obviating the costs of a footbridge, and closer to the centre of new office and residential growth in White City East, including the Imperial West campus.</p> <p>To be raised at the RBKC Streetscape Advisory Group</p> <p>Rental levels and trial periods are a matter between owner and tenant and not a matter which can be determined by planning and development policies. StQW 7a) proposes allowing permanent change of use between A, B and D class uses, subject to amenity considerations.</p> <p>Worked up ideas for traffic calming measures (without transferring to Highlever Road) are welcome. The RBKC Streetscape Advisory Committee will consider suggestions for streetscape improvements. These are matters which could be covered by additional Actions in the Draft Plan, but are not planning or development matters which could be the subject of policy proposals. It is these policy proposals which will be the subject of a vote at the referendum.</p> <p>Some information on the employment profile of the neighbourhood is included in the Employment section of the Draft Plan. The Forum</p>	
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	<p>how far they commute to &amp;c.          And how many jobs are provided in the area to non-residents          This will help inform proposals re residential and employment use classes, also re transport links.          Is it available from RBKC?          Is it possible to do a survey directly with residents?</p> <p>10          it would be helpful to have a profile of the size and types of households in the area-          number of households          number of bedrooms per household          number of rental properties          Is this information available from RBKC council tax department?          Zoopla or Mouseprice?          Is it possible to do a survey directly with residents?          This could help arguments for the nature of new housing proposals in Latimer Road and set suitable targets.</p> <p>11 It would be great to know where children go to nursery and school- how far they need to travel and if there is a need for a nearer facility. This would help with recommendations for developments at Latimer Road, St Quintins Ave and Nursery Lane. Without such knowledge base I think proposals can only be rather blindfold</p>	<p>considers this level of data to be proportionate to the content of the Plan. The information suggested above is not readily available from RBKC, for the for the StQW area.</p> <p>The Forum does not have funds or capacity to undertake detailed analysis of Census Data at Output Area level. As explained in the Draft Plan, the StQW area covers part of two wards, the boundaries of which changed in May 2014. 'Ward profiles' published by RBKC have now been updated for the new wards, and relevant changes to data have been added to the Submission Version of the Draft Plan. A residents survey was carried out in January 2014 which covered transport issues and the results fed into the Draft Plan. The Forum does not have funds to conduct a further survey.</p> <p>The tenure profile of the Borough is set out in Section 10 of the Plan. Data for the StQW neighbourhood would require detailed analysis of Census data at Output Area level, which the Forum cannot resource. Data from RBKC ward profiles is not of assistance as the proportion of social housing is very different north and south of Dalgarno Gardens. As above a StQW residents survey was conducted in January 2014 which included a question on housing tenure. The results are available on the StQW website, but on a 6% response rate for all households are not reliable enough to extrapolate across the neighbourhood.</p> <p>There are no known sources of travel to school data for children, broken down to the level of the StQW neighbourhood. Were the Forum to have capacity to undertake a further residents survey asking this specific question, the response rate would not be great enough to give reliable data across the StQW neighbourhood.</p>	
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	<p>12 see comments above on sections 9, 10 and 11- detailed information would help make more precise and fitting proposals for developments on the proposed sites in the area to be appropriate.</p> <p>In summary- it's a great opportunity to do this Plan and of lasting impact on the area, but we need to do it right and take the time needed for that.</p>	<p>The StQW Draft Plan has been in development since 2012 and relies on volunteer input. The Forum and its management committee have to strike a balance between extending a process which has so far taken 3 years, in order to undertake further analysis and consultation, or finalising the submission version of the Draft Plan. The decision of the StQW management committee was to undertake the pre-submission consultation from December 1st 2014 to January 25th 2015. The Forum's £6,800 grant from Locality had to be fully spent by December 31st 2014 and there is no certainty that the Forum will have access to further funding. The management committee has been assessing consultation responses prior to agreeing a finalised Submission Version of the Draft Plan.</p>	
<p><b>Steph Weatherill, Brewster Gardens, W10</b></p>	<p>I hereby confirm my support for the proposed St Quintin Neighbourhood Plan. I strongly believe that all three remaining backland sites in the neighbourhood should be protected as local Green Spaces and support the plan's vision of directing residential developments to existing "previously developed" sites such as the commercial buildings on Latimer Road.</p>	<p>Comments support three sections of the Draft Plan</p>	<p>Sections 4, 8 and 10.</p>
<p><b>Isabel Eden, 28 Brewster Gardens London, W10 6AJ</b></p>	<p>I have read the StQW Draft Neighbourhood Plan, for which I confirm my support.</p> <p>In particular I support the proposals in the Draft Plan to designate the Nursery Lane site as Local Green Space and to preserve the other open spaces, referred to in the Draft Plan. I am not opposed to all new development and I understand the need for new housing but, as proposed in the Draft Plan, there are more appropriate locations in the neighbourhood for this, such as Latimer Road and the site at Crowthorne Road.</p> <p>As I live in close proximity to North Pole Road I believe changes to the local road network are greatly needed to reduce the heavy traffic congestion caused by queues of motor vehicles exiting onto Wood Lane/Scrubs Lane. Also, an additional overground station at Western Circus would go some way to improving sparse public transport amenities in the neighbourhood.</p>	<p>Comments support 3 sections of the Draft Plan</p>	<p>Sections 4, 5 and 10</p>
<p><b>Gianluca Spetale 20 Brewster Gardens,</b></p>	<p>I would like to register my support for this neighbourhood plan. I believe that the Nursery Lane land and the other two backland sites need to be supported and maintained as</p>	<p>Comments support 2 sections of the Draft Plan</p>	<p>Sections 8 and 10</p>

<b>W10</b>	valuable green space. I further support the plan's vision of directing residential developments to existing "previously developed" sites such as the commercial buildings on Latimer Road. Please do not hesitate to let me know if there is any want in which I can further assist you and the plan.		
<b>David Hucker 173 Highlever Road W10</b>	This email is my statement of support for the Draft Neighbourhood Plan.  The Plan has been the subject of extensive community consultation and I believe it reflects a collective commitment to preserving local heritage and environment while being open to proposals for new developments on appropriate sites. This is exemplified in our strong belief that the Nursery Lane land and the other two named backland sites need to be preserved in a natural state; and our support for directing residential developments to existing "previously developed" sites such as the commercial buildings on Latimer Road. I am very grateful to you for all the work you have led to develop the Neighbourhood Plan. I very much hope that its content will be welcomed and endorsed by RBKC.	Comments support 2 sections of the Draft Plan	Sections 8 and 10
<b>Amelia Slocombe. StQW Neighbourhood resident</b>	James Egert, Amelia Slocombe, Giulia Ghelli, Emily Egert and Sam Egert support the neighbourhood plan. We believe that the Nursery Lane land and the other two backland sites need to be supported, and we support the plan's vision of directing residential developments to existing "previously developed" sites such as the commercial buildings on Latimer Road. This email is my statement of support for the Draft Neighbourhood Plan.	Comments support 2 sections of the Draft Plan	Sections 8 and 10
<b>Kim Evans OBE 173 Highlever Road W10</b>	The Plan has been the subject of extensive community consultation I believe it reflects our collective commitment to preserving our local heritage and environment while being open to proposals for new developments on appropriate sites. I believe this is exemplified in our strong belief that the Nursery Lane land and the other two named backland sites need to be preserved in a natural state; and our support for directing residential developments to existing "previously developed" sites such as the commercial buildings on Latimer Road. I am very grateful to you for all the work you have led to develop the Neighbourhood Plan. I believe the process through which it has been drawn up is an exemplar of best practice and I very much hope that its content will be welcomed and endorsed by RBKC	Comments support 3 sections of the Draft Plan	Sections 2, 8 and 10
<b>John Worontschak StQW Neighbourhood resident</b>	I believe all backlands should be protected and to <ul style="list-style-type: none"> <li>designate the land at Nursery Lane as Local Green Space</li> <li>add an additional Overground station at 'Western Circus'</li> </ul>	Comments support 2 sections of the Draft Plan	Sections 4 and 5
<b>James McCosh, Partner, van Heyningen and Haward Architects and StQW Neighbourhood</b>	I would like to let you know my comments on the draft plan as now presented. Well done for getting it this far.  These are as follows:		<b>Section 2</b>

<p><b>resident</b></p>	<p>2.3.1 as a resident living in a house in a 'groups of buildings where the existing roof line is unimpaired by extensions' I strongly object to the (RBKC) policy CL8b(i). The policy, when applied to our houses/streets, prioritises a (misunderstood) aesthetic assessment over the social and functional requirements of a residential area.</p> <p>All conservation issues relate to the <i>significance</i> of the element being considered. The key facts are that the aesthetics of houses of the St Q estate are about the street frontages, the rears are subsidiary, informal and have always been varied. The houses are all different within the design format established at the outset, and these differences add to their usefulness and quality of houses. The interiors and backs have always been built to suit their occupants, and the informality and ad-hoc nature of the rear envelope and individual gardens is a strong part of the character of the area - as much as the consistency of the street frontages. There is no historical significant to uniformity at the rear.</p> <p>Due to the urban layout of the blocks and dense terraces, the side and rear elevations, and rear roof slopes have no visual impact on the public realm. There is no architectural significance to the consistency of the rear frontages - the opposite is the case here.</p> <p>Functionally there are potentially reasonable concerns about overlooking, but this is not demonstrated in this policy or its application - we have had numerous roof extensions and dormers permitted overlooking us on Kingsbridge Rd, but none permitted on ours. The (minimal) impact on neighbours is the same in each direction. The present policy is both intellectually indefensible and unfair.</p> <p>I would therefore, from both an educated view of planning policy and building conservation, and personal experience as a resident, strongly support 2a.</p> <p>Incidentally, the Paris planning rules specify a % of roofline length allowable for dormers. This allows either a large dormer or more smaller. Policy of this flexibility would enhance residents choices as well as the variety of rear frontages -which is significant.</p> <p>2.4.5 for the reasons you give I support the action to redraft the article 4 on front roofs &amp; rooflights, and to include painting. The latter is damaging to the consistency of the red brick street elevations, which is significant. It's also worth noting that because of the bricks softness, painting is practically irreversible. It should apply to all red brick elevations - the original side elevations in red brick are significant architecturally; they are part of the street frontages.</p> <p>2.6.6 I think that front garden walls should be controlled by policy. The current heights should be enforced, noting and allowing the posts to rise above - they were originally higher.</p>	<p>Comment agreed</p> <p>Comment agreed</p> <p>Comment agreed</p> <p>Comment agreed. Draft StQW Policy 2a will ensure consistency in future.</p> <p>Noted, but the width of houses in the StQW area does not vary greatly.</p> <p>Comment agreed. The StQW Plan seeks action by RBKC on an Article 4 which would remove PD rights on painting brickwork on all elevations 'facing the highway.'</p> <p>StQW Draft Plan proposes an 'Action ' on enforcement of non-approved boundary walls</p>	<p><b>Section 2</b></p>
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	<p>The recent fashion for high bar railings, pavement edge gates and letter boxes/intercom is hugely damaging to the area as a whole, aesthetically, and promulgates a 'siege mentality' at odds with the STQW vision.</p> <p>It would be possible to come up with a design framework which new residents or new applications needed to comply with to get consent, and over time this would restore character.</p> <p>2.7.5 I support this. RBK&amp;C also needs to enforce its current rules - see current works to house in Wallingford avenue with front garden entirely covered in concrete and hard grey tiles.</p> <p>2.8.3 I agree, see arguments above re significance of rear frontages.</p> <p>2.9.4 I think detailed policy is helpful, the permitted development rights say nothing about architectural character or appearance. There should be simple rules about what impacts a garden building must avoid, particularly overlooking and overshadowing. Similar to points re 2.6.6.</p> <p>It should also be impossible to use such a building as a place of work with employees - our experience with neighbours (since moved) basing a business with employees in their outbuilding was that this had a significant impact on our privacy.</p> <p>2.10.1 The rear should be able to be over insulated. However, fire and construction issues arise at the party wall. There needs to be a fire stop and there should be a limit on over calling thickness - 150mm would provide much better performance without major impact on adjacent windows etc.</p> <p>2.11.3 support this</p> <p>2.12.1 support this</p> <p>So,</p> <p>I fully agree with StQW 2a and 2b and 2c and 2d and 2e and 2f and 2g.</p> <p>I think there should be policy on outbuildings plus an Action regarding RBK&amp;C preventing their use as an independent dwelling or as a place of employment.</p> <p><b>Environment</b></p>	<p>beyond PD rights. RBK advice that an additional 'policy' would be too complex.</p> <p>Comment agreed</p> <p>See above.</p> <p>See proposed StQW Policy 2e. Little evidence of enforcement of works that exceed PD rights, but StQW Plan should raise awareness.</p> <p>Issue of garden 'outbuildings' to be re-examined for Submission Version of Plan.</p> <p>Not clear that such conditions can be placed on outbuildings, provided they remain ancillary to the main dwelling.</p> <p>Proposals to ass a StQW policy to allow for rear render above ground floor was discussed at meeting on Feb 5th, but voted against by a large majority.</p> <p>As above.</p>	<p><b>Section 2</b></p>
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	<p>I agree with 3a, 3b, 3c, 3d</p> <p>3c The worst impact of advertising hoardings on the Westway - light pollution at night - could easily be mitigated by proper design so the screens can only be seen from the Westway.</p> <p>3d the species of tree - and scale - is important. The small growing trees planted recently don't shade adequately - a plea for plane trees, properly looked after.</p> <p>3iv the reason we all depend on broadband via virgin cables is that BT wasn't allowed to put its larger cable boxes in as RBK&amp;C felt they had a negative impact on the conservation area. This harms residents and businesses. They should be encouraged to provide modern infrastructure to the area, with considered locations for the equipment.</p> <p>I strongly support StQW 4a, 4b.</p> <p>In notes to policy 4b it would be worthwhile reiterating the threshold of 'mature' which is measured I think by tree or limb girth, and is I recollect quite small.</p> <p>Transport 5.2.8 &amp; 9 agree. I particularly agree with last sentence of 5.2.9. Suspect the answer is the Congestion Charge boundary reverting to its enlarged extent, plus better options re public transport and Cycling</p> <p>5.3.2 Speaking as an everyday commuting cyclist - to Camden or the west end or further, I think the key issue for the Westway segregated cycle link is how one can get on and off it. If it had an up/down ramp adjacent to Latimer Road for example, it could be really helpful in complementing the other great E-W route - the canal. However, importantly, it should be separate from the Westway roundabout, which is already congested ( and lethal).</p> <p>A segregated/safe route N-S from Harlesden/Willesden to Shepherds Bush could interconnect with this, and would long term hugely help the traffic problems on A219 by offering a quicker and/or cheaper alternative which would connect with Crossrail and HS2 at Old Oak.</p> <p>The Westway route doesn't replace the backstreets routes, but adds to the accessibility of the whole area for cyclists - potentially including Westfield from the north.</p> <p>Cycling would be given a big boost if RBK&amp;C would provide on street bike enclosures - as in Holland (or Lambeth) for residents bikes. One could reduce the residents parking demand by having a 1 car/dwelling unrule too...</p>	<p>This advertising structure is due to be rebuilt, with screening from StQW area.</p> <p>RBK&amp;C to note. Most cable boxes do not require planning permission.</p> <p>StQW Draft plan proposes better Overground and cycling options.</p> <p>StQW Policy 12 a proposes allocation of land at 301 Latimer Road for a cycle lift in connection with approved proposals for TfL East/West Cycle Super Highway.</p> <p>Agreed.</p> <p>Agreed.</p>	<p>Section 3</p> <p>Section 4</p> <p>Section 5</p>
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	<p>5.4.3 the Council should forget the tram and keep pushing for a Crossrail station.</p> <p>5.4.5 Agree. Oxford Gardens really doesn't need a bus route. Best way of addressing PTAL of Latimer Road etc would be a tunnel to Imperial West as they suggested.</p> <p>5.5.2 We should lobby for the underpass, which would be of great benefit. It would be even better if combined with a West London Line station, serving STQW and Imperial west and north white City. So strongly agree with 5.6.3.</p> <p>So, I agree with 5a, 5b, but add cycle superhighway on/off ramp, agree with 5c and 5d. 5vi should be there too.</p> <p><b>Shopping</b></p> <p>7.2.6 I would only support temporary closures, as a market on a specified day, but no permanent closure.</p> <p>Agree with STQW 7</p> <p><b>Latimer Road</b></p> <p>I think a bolder approach is needed, although I agree with the basic diagnosis.</p> <p>The narrow width of the plots between the street and the railway line, limited height to develop, the lack of good transport and the negative impact of the traveller community are all reasons for the failure of the southern end of Latimer Rd.</p> <p>I think a connection to Imperial West or a new overground station would change this scenario. I think actually the completion from Imperial West might generate a critical mass and regenerate Latimer Rd. As would an Action to work with the Westway Trust to improve the pedestrian routes between Latimer Road tube station and Latimer Road it's not far but confusing, badly lit, not overlooked and grotty. So people take Bramley Road and Oxford Gardens - twice as long.</p> <p>I think that part of the problem is low density, there is insufficient employment density to support a working community at present, and that this could be overcome partly by allowing higher development. I think the height proposed is overly conservative, one could build to 6 or 7 storeys if it wasn't continuous. This would have a lower skyline than much of imperial west, ( and would hide it which would benefit the conservation area).</p> <p>This would allow substantial private and affordable residential - the mixed tenure being</p>	<p>RBKC is continuing to lobby for a Crossrail station at Kensal, Beyond scope of StQW Plan.</p> <p>Pedestrian/cycle underpass remains proposed - see StQW Action 5iii</p> <p>Experiments with weekend closures proposed, as an Action not a Policy.</p> <p>Noted. The StQW Forum has had to balance</p> <ul style="list-style-type: none"> <li>views of Latimer Road residents opposed to increased building heights</li> <li>the fact that Units 1-14 and office buildings at southern end are in separate ownerships, so scope for more comprehensive development is limited.</li> </ul> <p>Agreed. StQW Policy 10b is designed to encourage residential above commercial</p>	<p>Section 7</p> <p>Section 8</p>
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	<p>vital - over employment, leisure and A3 type uses. To restrict the residential from taking all the sites I think permission for it should be only given if it provides 2-3 floors of employment use, which is expressed on the facades - see modern mixed use blocks in most continental cities.</p> <p>I also think that the nature of the current developments don't help - they are unattractive buildings with floor plates that are too small for substantial occupiers and too large for innovative small media, professional and it businesses. Lots of these operate from residential properties in the borough but cannot grow locally. Allowing bigger buildings, and making small development less attractive, would help viability and critical mass.</p> <p>Low rents are useful for many small businesses - so in the short term if the residential 'pays for' the employment floor pace capital cost, it will still benefit the local economy. Then it will pick up and grow.</p> <p>So I agree with 8a, disagree with the wording 8b since I think it will encourage small scale development which misses a great opportunity. Go higher! Why not say 'allow third floor and above for residential use....'. (However I agree it's approach). I agree with 8c, but might also include C1 hotel as well.</p> <p>Hope this is useful - it's an impressive document, please don't take any of this as critical.</p>	<p>Agreed in relation to 1980s office buildings at southern end of Latimer Road. Units 1-14 can convert/redevelop successfully wth larger floor plates.</p> <p>StQW policy 8e on building heights being reviewed for Submission Version of Plan.</p> <p>Discussion at Feb 5th open meeting showed support for revised heights policy for Latimer Road (requiring lower heights in northern section). Some, but limited, support for higher buildings and a retail offer (supermarkets etc) at southern end of the street.</p>	
<p><b>C. Mannheim, Highlever Road, W10</b></p>	<p>I would like to add my response to some of the issues in the Draft neighbourhood plan. I am in agreement that we should relax some of the planning policies applying to the rear of the houses while maintaining more strict controls of the fronts of the houses . we would welcome an additional overground station as this area is not well served by public transport</p> <p>A improvement to the road network as there are daily queues on North Pole rd</p> <p>Allowing temporary road closures in St Helens Gardens in front of the church to allow for a pedestrian area and possibly a farmers market.</p> <p>A restriction on the height of buildings on the west side of Latimer rd plus allow a range of uses other than offices ,( housing is much needed) on the west side</p> <p>and finally agree with plans to designate the land at Nursery lane as a Local Green space</p>	<p>Comments support 6 sections of the Draft Plan</p>	<p>Sections 2, 4, 5, 7, 8 and 10</p>
<p><b>Emma Henderson, Pangbourne Avenue, W10</b></p>	<p>Please may I comment on the draft as follows:</p> <ul style="list-style-type: none"> <li>Latimer Road building heights - YES, building heights no taller than the existing houses on the east side of the street (c.f. the new buildings in Pangbourne Avenue which tower over the cottages opposite - terrible mistake allowing this, please do</li> </ul>	<p>Comments supports 4 sections of the Draft Plan and seek more controls on Basements. The StQW Forum will support RBKC work on further controlling noise and construction management,</p>	<p>Sections, 2, 4, 5 7</p>

	<p>not repeat it elsewhere)</p> <ul style="list-style-type: none"> <li>• Nursery Lane as designated as Local Green Space? YES, AND THE EXISTING MATURE TREES MUST BE PROTECTED AND PRESERVED</li> <li>• a new Overground station at Imperial West, beneath the Westway flyover? YES. If they want to build an underpass to Oxford Gardens then definitely provide us with better transport from Imperial West</li> <li>• Conservation area policies STRENGTHEN AGAINST BASEMENT EXTENSIONS</li> <li>• Vacant shops in North Pole Road and St Helens Gardens? POP-UP HOPS/GALLERIES/EXHIBITIONS/CHARITY SHOPS - presumably the landlords or freeholders are the problem, asking too high rent?</li> </ul>	but does not consider than neighbourhood-level basement policy is feasible at this time, following the recent introduction of RBKC Policy CL7.	
<p><b>Emma Marshall.</b> <b>15 St Quintin Avenue. W.10</b></p>	<p>I write to support the following;</p> <ul style="list-style-type: none"> <li>• relaxation of some RBKC Conservation policies applying to the rear of houses, while maintaining controls on the front elevations</li> <li>• the campaign for an additional Overground station at 'Western Circus' (at the southern end of Latimer Road, beneath the Westway roundabout</li> <li>• more radical changes to the local road network to relieve the daily queues to exit North Pole Road</li> <li>• experimenting with occasional temporary road closures in the section of St Helens Gardens opposite the church, to encourage use of this space and the shop forecourts as a 'pedestrian piazza'.</li> </ul> <p>It is crazy that some streets in the area are allowed dormer windows while others are not. An overground station would link the area with Acton and Kensal Rise and would be great addition to the public transport of W.10 and encourage more residents to leave their cars behind.</p> <p>The traffic lights at the exit of North Pole Road need to be adjusted at busy times to relieve congestion.</p> <p>It would be great if we could have a local farmer's market and pedestrianise the area on St Helen's Gardens.</p>	Comments support 3 sections of the StQW Draft Plan	Sections 2, 5, 7
<p><b>Malise and Ianthe Ruthven,</b> <b>Brewster Gardens W10</b></p>	<p>Ianthe and I strongly welcome the Draft St Quintin and Woodlands Neighbourhood Plan which you have outlined above. As long-term residents of 36 Brewster Gardens we strongly support the proposal to designate the Nursery Lane site used by Clifton Nurseries and other tenants as Local Green Space in view of the fact that this is previously undeveloped land. As you will know, we are strongly opposed to plans by London Realty to build 21 luxury dwellings on this site and to fell the magnificent willows adorning this site. We also welcome the suggestion that part of Latimer Road should be redesigned for housing and the proposal for an Overground station at the Western Circus.</p>	Comments support 3 sections of the StQW Draft Plan	Sections 4, 5, 10

<p><b>Mr D M Makromallis and Mrs M C Makromallis, Highlever Road. W10</b></p>	<p>As local residents my wife and I write to express our support for the above plan and will be voting for it in the forthcoming local referendum.</p>	<p>Comments support the Draft Plan</p>	
<p><b>Henrietta Esiri 56 Dalgarno Gardens, W10</b></p>	<p>I am writing to say that I have looked at the latest draft of the neighbourhood plan and I fully support it. I have lived in Dalgarno Gardens since 1999 and before that lived in Elgin Crescent, so not far away. I have never seen Latimer Rd reach its full potential and I think more development of housing, shops, businesses and cafes would be a welcome addition to this area.</p> <p>Transport links do need improving and a nearer station at Western Circus would be excellent. My daughter could use it to get to and from school in Hampstead, instead of being driven part of the way.</p> <p>The relaxation of the rules around back attic dormers would be very welcome as I badly need a 4th bedroom but could NEVER afford to move to a larger property within the area. My adult children still live at home and also my teenagers and we badly need more space. We are 4 in a 3 bed house. They love the area and I would hate to see them move out if they do not wish to.</p> <p>Finally, there is so much short term desire to build in London to make a profit. The preservation of Green Space is so important for the future quality of life of the city. I therefore strongly support the preservation of the backlands as green spaces. The backlands site at Nursery Lane backs onto my garden and the wildlife is a major contribution to the quality of life for me and my family. It is also a great benefit to the local environment.</p> <p>Best wishes with taking the plan to the next stage and I look forward to seeing its development and to voting in the referendum.</p>	<p>Comments support 4 sections of the Draft Plan</p>	<p>Sections 2, 4, 5, 8</p>
<p><b>Oliver, Manuela, Charlie, Henry and Peter St John at 22 Brewster Gardens W10</b></p>	<p>Please be assured that we strongly support all 12 key objectives of The Neighbourhood Plan. In particular we strongly support the proposal to have the land at Nursery Lane designated a Local Green Space. Also we strongly believe that should any development be permitted to take place , it should be on previously developed sites, such as the commercial buildings at Latimer Road.</p> <p>In particular also we urge the Planning Department RBK&amp;C to understand that the St Quintin area was designed to be more suburban than urban with open green spaces and wide and peaceful streets. The building of 20 + houses on the land at Nursery Lane would necessarily involve the following very regrettable consequences:</p>	<p>Comments support all sections of the Draft Plan</p>	<p>All</p>

	<p>(1)The total loss of a potential garden square with all the present wildlife and mature trees and its aspect of peace and tranquility which is of enormous benefit to the 55 surrounding houses and the retirement homes on its southern side.</p> <p>(2)a massive increase in local congestion once built</p> <p>(3) the strong probability of disrupting the flow of the river which flows under the Nursey Lane garden -with possible flooding and damage to the basements and foundations of existing nearby houses and buildings.</p> <p>(4) one to two years worth of building disruption affecting the lives of 200 + locals</p> <p>(5)the probable sale to "buy to leave" investors from abroad ,who would be unlikely to be involved in the local community</p> <p>These are just a few of the more obvious objections to allowing the development .Please therefore be assured of our support for the above plan.</p>		
<p><b>Dr William Cooper Committee Member St Quintin and Woodlands Neighbourhood Forum</b></p>	<p>I am writing in response to the public consultation on the pre-submission draft Neighbourhood Plan. As a founding Committee Member of the St Quintin and Woodlands Neighbourhood Forum I am a supporter of the draft Neighbourhood Plan and I would like to thank the Chairman for his considerable hard work in bringing this together.</p> <p>The draft Neighbourhood Plan reflects the various views that have been expressed through a consultative and collaborative process involving the local community of people that live and work in the area. It is unfortunate that this does not necessarily include those that live in the section that lies outside the Royal Borough of Kensington and Chelsea that Hammersmith and Fulham Council refused to designate as part of this Neighbourhood Area. As a result many people may not have had an opportunity to represent their views on a plan that will directly affect their local neighbourhood, either through the process of consultation or in a future local referendum.</p> <p>As a resident of Hammersmith and Fulham I therefore feel an obligation to represent the collective interests of those immediately beyond the designated area as well as our neighbours across the borough boundary, particularly those outside the existing Conservation Area. Specifically, in relation to the proposals for Latimer Road contained in section 8, there is a clear need for a new approach to revitalise this area along the borough boundary. However, as yet there does not appear to be a clear consensus on the solution and the some of the proposals for this area have already met with firm objections from local residents.</p> <p>There is a case that Latimer Road should cease to be designated as an Employment Zone, while retaining a mixed use as a residential street with offices, workshops, creative spaces and other facilities and amenities. The main objection, which has been specifically raised by a number of residents of Latimer Road, is the proposal to increase the maximum height of</p>	<p>Comments support Sections 5 and 8 of the Draft Plan other than for Draft Policy 8e which is opposed.</p> <p>This policy on building heights in Latimer Road was revised following discussion at the open meeting of the Forum on February 5th.</p>	<p>Section 8</p>

	<p>buildings on the western side of the street to 14 metres as stated in draft proposal 8e. A height of 14 metres above ground would extend beyond four residential stories and more than three typical office floors.</p> <p>The residential buildings in Latimer Road are currently two or three stories at most, while the existing light industrial units are generally no higher than two storeys. The very principle of establishing a certain height as a guideline, which has not been adopted elsewhere in the draft Neighbourhood Plan, is profoundly imprudent. Experience elsewhere has shown that such limits are often simply used as the starting point for applications by prospective developers to maximise their own opportunities.</p> <p>The issue of height should therefore be left to existing planning policies and processes, without establishing a potentially damaging precedent. While taller buildings may be acceptable in the southern section opposite the proposed development on the Imperial West site, any development further north above the existing roofline would necessarily have a negative impact on the outlook of the existing residential buildings in Latimer Road.</p> <p>Any building that would project above the railway track bed of the West London Line would not only be directly visible from residential properties on Eynham Road in Hammersmith and Fulham but would potential overlook their private gardens and shared communal garden. I am personally sympathetic to residents with concerns about the potential loss of outlook and privacy from any potential developments that would overlook and overshadow them from across the street or across the railway track. This was one of the original objections to the scale and massing of the development on the former Woodlands site at Imperial West, which was one of the factors that spurred the community into establishing a Neighbourhood Forum and Neighbourhood Plan.</p> <p>Given the value of land and property prices in the area, it is evident that viable productive use could be made of the footprint of the light industrial units within the existing volume envelope. Any case to the contrary simply plays to the economic gain of property developers and represents the type of specious commercial arguments encountered in other planning applications to which members of the Neighbourhood Forum Committee have previously objected. It would be unfortunate if one of the main outcomes of the Neighbourhood Plan were to lead to development that would have a directly negative impact on local residents. This appears to be one of the most contentious elements of the draft Neighbourhood Plan, which has otherwise found favour with local residents and businesses.</p> <p>The risk is that it provides a reason for some people to object to the plan as a whole in a local referendum. The proposals for Latimer Road have also attracted considerable attention from officers of Kensington and Chelsea council. While it is appropriate for the</p>	<p>This policy on building heights in Latimer Road was revised following discussion at the open meeting of the Forum on February 5th, and a specific height guideline removed.</p>	
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	<p>Neighbourhood Plan to represent the interests of local residents and businesses in outlining their perceived priorities for the area, some matters might be better left to existing planning policies and processes.</p> <p>For these reasons, I strongly recommend omitting any reference to maximum building heights on Latimer Road from the final release of the proposed Neighbourhood Plan. I therefore propose the removal of section 8e of the draft Neighbourhood Plan and any associated references. In other respects, there appears to be strong support for the revitalisation of Latimer Road.</p> <p>There is also support for an additional London Overground station beneath the A40 to serve this area and the considerable developments proposed for either side of the Westway, supported by the planned pedestrian underpass and providing direct connections to the transport infrastructure proposed at Old Oak. In my view, this is exactly the sort of creative community-led thinking that the ambitions of localism should enable. I welcome the publication of the pre-submission draft Neighbourhood Plan for public consultation.</p> <p>I am content for my comments to be published as part of the public consultation. I encourage others to look carefully at the proposals for Latimer Road in particular and to express their opinions prior to the preparation of the final version of the Neighbourhood Plan on which residents and businesses in the designated area will have the opportunity to vote in a local referendum.</p>	Agreed.	Section 8
<p><b>Tania Martin</b>  <b>85 Highlever Road</b>  <b>W10</b></p>	<p>As a resident within the St Quintin's Neighbourhood Forum area, I wholeheartedly support the Neighbourhood Plan. It will be key in preserving and encouraging the good qualities of a genuine neighbourhood as well as enabling regeneration of areas that need an uplift.</p> <p>Highlighted in feedback from consultations is a desire regenerate Latimer Road and uplift the local shopping streets. As an employee of a business on Latimer Road, and can confirm that local facilities for employees are poor. There is a cry from all who work on Latimer Road for more cafes and places to get food, as well as better connection to White City/Westfield and better transport links (no direct way to get to Notting Hill!). Safety is also an issue for people working on Latimer Road, which can feel unsafe and empty when walking home on dark nights, plus many buildings have experienced serious break-ins increasing the sense of threat. Introducing mixed use to Latimer Road, with cafes/restaurants on the ground floor of the commercial buildings, would turn the street from an empty high speed cut through into a much needed vibrant hub. As an employee of at business on Latimer Road, a local resident and Committee Member, I support the Objective for Latimer Road, to maintain and (in some parts of the neighbourhood) widen the mix of uses to keep buildings occupied and in active use.</p>	Comments support Section 8 of the Draft Plan	Section 8

	<p>As a Member of the Forum Committee, I consider that the Committee has been very thorough in engaging with residents, businesses and community assets to find out what they want from their neighbourhood and how it could be improved, which has been laid out in the Neighbourhood Plan. The Committee is very open and transparent and has acted as a channel for the local voice. Throughout the Neighbourhood Plan process the interests of the neighbourhood, as a whole, has always been put first by the Committee.</p>		
<p><b>Peter Warren</b>  <b>147 Highlever Road, W10</b></p>	<p>I very much welcome the plan to maintain the area as it was originally planned with mainly individual houses, wide roads and open backlands and prevent it from detrimental development. I am in favour of development to meet modern needs but not in a way that spoils the area for future generations. We have lived here since 1970 with our children and have much enjoyed being in London and yet in an almost village atmosphere. We would want other families to have that opportunity.</p> <p>Keeping the nursery lane site as an open space is crucial for the area and local residents. Housing there would make an overcrowded region - too many houses, cars and traffic for the small area. And its aim is a commercial profit driven project not aimed at local housing need.</p> <p>I am in favour of broadening the brief for the industrial area of Latimer road to allow for (key worker ) flats above work units.</p> <p>An overground station at western circus would be very useful and serve a developing community.</p> <p>Pedestrian area in front of St. Helens shops would be excellent and reduce traffic congestion and danger in that area.</p>	<p>Comments support 5 sections of the StQW Draft Plan</p>	<p>Sections 4, 5, 7, 8 and 10</p>
<p><b>Laura Michaud,</b>  <b>Bracewell Road, W10</b></p>	<p>Thank you for publishing the draft neighbourhood plan and delivering the brochure and flyer material over the last 18 months. I have studied all of these in a great amount of detail along with attending your regular church meetings, and would like to think I represent a fairly typical mother living in this area. The majority of us are owner occupiers and the area has a strong community feel - the main reason we bought here.</p> <p>I am of the opinion that the plan has been written in a manner that addresses the issues that need addressing in the local area and wholeheartedly support it.</p> <p>The area is well known to me and having lived in 3 different properties in RBKC over the last 10 years, I have found a fantastic area to raise my family.</p> <p>All areas face challenges and have scope for improvement, and without going into too much detail regarding the individual policies, I can only see benefits to the following general points in particular, and I have given my reasons for these below.</p>	<p>Comments support 4 sections of the StQW Draft plan</p>	<p>Sections 2, 5, 7, 8</p>

	<p>- <b>Ensuring that the front facade of the houses on our roads is protected where possible, but allowing some relaxation at the rear of the properties</b> particularly at ground floor level.  <i>The rear of our properties (particularly at ground level) are not usually visible to the public and only our neighbours. The changes that are commonplace across our area allow for a far more modern lifestyle for the typical families that reside in the local area. So many houses have made these conversions already, and continuing to allow houses to modernise their homes will ensure that families get the best use of space from their homes.</i></p> <p>- <b>Considering the pedestrianisation of a small section of St Helen's Gardens</b> on some days in the month to allow for community activities (farmers market, church meetings, community fairs etc).  <i>Bringing together a strong community as often as possible is always good. Allowing us and our children to mix and get to know one another is something that should be encouraged wherever possible</i></p> <p>- <b>Encouraging flexibility in usage classes within our 2 shopping parades (North Pole Road and St Helen's Gardens)</b>  The blight of our shopping parades are the empty shops, most of them have been vacant for years (one for over 20 years). I cannot get over what a waste of resources this is. Allow and encourage change of use so that we keep our community here, shopping here, using services here. We do not want to all go to Westfield to ignore one another.</p> <p>- <b>Encouraging flexibility in usage classes on Latimer Road</b>  I do not walk down this road, and would not allow my children to walk down it. I am confident that it is the most poorly looked after road in RBKC. It is a wide road with nice houses along one side and yet, no one has done anything about the many vacant units that have amassed along the western side of the road. Some have little or no activity in them for weeks/months. There are small courtyards that run between the industrial units that only encourage petty crime and small gangs to gather. The road needs a dramatic rethink, much like Freston Road had, so that we can encourage people to come and work / live in our area. We need more houses, and ideally a stepping stone so that the next generation don't need to move to the suburbs. Allowing a whole mix of uses along Latimer road, would not only smarten up the road by allowing the units to be developed and reconfigured (ideally with more well thought out design/materials), but would also bring 24 hour use to a road that suffers from feeling totally neglected. Warehouses and office space that is boarded up, or huge units that are used for storage and employ just 1 or 2 people to manage them who come to the buildings once a week adds no value to the community. This is something you would expect to find in the industrial estates in Park Royal, not in</p>		
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	<p>RBKC. I cannot see any advantage of encouraging warehouse storage for furniture outlets.</p> <p><b>- Western Circus overground line</b>  Similarly to the above, Latimer Road and its surrounding roads suffer from some of the poorest journey times to get to a local station in the borough. Consequently we are forced to drive everywhere. For the people that work in Latimer Road, I can imagine that it is a real problem for businesses that are looking at moving into the area. Who wants to walk 20 minutes in the cold from White City to get to their office? It is archaic that the council have not <b>addressed</b> this issue over the years.</p> <p>I want to see our local area prosper and be a safe and enjoyable community for us and our children. All of the above I feel very strongly about and would welcome any policy changes that help us achieve that.</p>		
<p><b>Nigel Whitbread,  Wallingford Avenue, W10</b></p>	<p>Whilst I strongly support the aims and intent of the draft plan, the following comments reflect my particular interests and those I currently disagree with although they may have received a majority support at the public meetings, the meetings have been attended by a small audience.</p> <p><b>Objective 1: Keeping Life Local</b>  I suggest we include in this section mention of the 2 GP surgeries in the St Quintin Medical Centre and their important contribution to the village quality in the St QW community.</p> <p>2.3.1  I strongly agree with the consistent policy proposed for rear roof dormers and that consistent design parameters are enforced by RBKC case officers in determining planning applications</p> <p>Front Rooflights  2.4.1; .2; .3; .4; .5  The impact from these elements must be controlled to preserve the Conservation area; I support the requirement that control is reinforced with an Article 4 Direction in the streets defined in the Plan.</p> <p>Painting of Brickwork on Front Facades  2.5.1 etc.  This must be discouraged to preserve the Conservation Area; I support the requirement that control is reinforced with an Article 4 Direction in the streets defined in the Plan.</p> <p>Garden Studios and Workrooms</p>	<p>Comments support 5 sections of the Draft Plan</p> <p>This section to be expanded in Submission Version to refer to 'walkable neighbourhoods'.</p>	<p>Section 1</p> <p>Section 2</p>

	<p>2.9.1 The Permitted Development Right allowing up to 50% of the land around the original house to be covered opens up the potential of huge outbuildings in the CA, destroying the importance of the private garden that the neighbourhood enjoys; providing green lungs to promote bio-diversity and wildlife. What is is RBKC policy CL2 on New Buildings? I strongly believe the gross floor area of garden studios and workrooms should be restricted to a maximum area, say 12m2, or up to 50% of the garden if the garden is less than 24m2.</p> <p>Rendering and Painting of rear brickwork above GF accommodation 2.10.1; 2.10.2 The government offer of vouchers up to £6K was for solid wall insulation both internally or externally applied but is currently withdrawn. I strongly disagree that painting or rendering of rear brickwork above ground floor accommodation in the CA. Reason: enhanced solid wall insulation can readily be installed internally. The visual loss of the natural clay brickwork prevailing in the CA, whilst hidden from the street and from the inside of the dwelling, will infect the neighbouring properties overlooking opposite, currently uniform, terraces. Painting and rendering rear brickwork at ground floor, generally privatised by brick garden walls, should be permitted.</p> <p>Nursery Lane Following a recent exchange in ownership, in the immediate future, RBKC should recognise the use of this site should be rightly designated as Local Green Space.</p> <p>Policies 5a/5b I strongly support the case for a new overground station etc.</p> <p>5.3.2 Whilst not a cyclist any more, I am strongly against the mistaken use of Westway, and the potential costs to be modified, as part of a cycle super highway.</p> <p>Latimer Road 8a,b,c,d,e I strongly support these policies</p> <p>11b) I suggest strengthening the importance of a continuing presence of the St Quintin Medical Centre in St Quintin Avenue: Any redevelopment of the site should require reinstatement of GP surgeries at ground</p>	<p>Additional policy on oubuildings re-inserted in Submission Version of Plan, as Draft Policy 2g Plan.</p> <p>Following vote at Feb 5th meeting, no policy proposed to allow rear render above ground floor.</p> <p>Issue to be revisited for Submission Version</p> <p>Decision now taken by Mayor of London to progress this scheme</p> <p>Wording of this policy revised in Submission</p>	<p>Section 4</p> <p>Section 5</p> <p>Section 8</p> <p>Section 11</p>
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	floor level. They are a vital constituent to the community	version	
<b>Jamie Renton Chief Executive Action Disability Kensington &amp; Chelsea,</b>	<p>Thank you for sending us the plan in question which we have now had the opportunity to discuss with our Access Group (a group of local disabled people trained in access-related issues).</p> <p>Whilst the group welcomed the plan, they asked why access (especially the access provision for disabled people) was not amongst the list of key objectives. They were extremely concerned about this as they felt that it suggested that the access and inclusion of all sectors of the community (including disabled people) was not a serious concern for those who drew up the plan.</p>	<p>The StQW Forum would wish the Draft Plan to include any issues of access which are live in this neighbourhood, but these have not surfaced at our public meetings at St Helens Church hall.</p> <p>Step-free access at Latimer Road Underground station, for example, would be such an issue. But this station is outside the designated neighbourhood area.</p> <p>The Draft Plan asks TfL and the Boroughs to look seriously at the prospects for an Overground station at 'Western Circus' (beneath the Westway roundabout) and an reference to step-free access has been added to Section 5 of Draft plan. ADKC have been invited to identify any further specific issues which the Draft Plan should address.</p>	All sections
<b>LB Hammersmith &amp; Fulham (Trevor Harvey, Planning Department)</b>	<p>The section on Old Oak (0.2.3 onwards) will require updating as necessary to reflect the more up to date situation regarding the Further Alterations to the London Plan and the proposed MDC.</p> <p>Regarding the Transport chapter:</p> <p>1) Policy 5a): Proposed station on the West London Line: LBHF generally supports the provision of additional stations on the West London Line, but this location is not a high priority for us as we are more concerned with ensuring that there is a West London Line connection with the HS2/Crossrail station. Therefore we cannot take the lead in developing the case for such a station, but we would co-operate with another body if it were to develop such a case.</p> <p>2) Action 5ii) TfL are currently undertaking a transport assessment of the Old Oak Opportunity area, including the effects on Scrubs Lane/Wood Lane.</p> <p>3) Action 5iii) We welcome the support for the proposed pedestrian/cycle underpass between Latimer Road and Imperial West.</p>	<p>This has been updated now that the Secretary of State has approved the establishment of the Old Oak and Park Royal Development Corporation.</p> <p>The Mayor of London has already announced his support for an Overground connection at Hythe Road (Option C of the TfL options) to link in with the planned HS2/Crossrail station.</p> <p>Given that it is developments in White City East rather than in RBKC which are generating additional traffic on Scrubs Lane/Wood Lane the StQW Forum feels strongly that LBHF should take the lead role in lobbying for a further Overground link at 'Western Circus'. To promote major developments through a Local Plan and OAPF, without adding to the public transport infrastructure, would seem a recipe for worsening traffic problems for local residents and businesses on both sides of the borough boundary.</p>	<p>Section 7</p> <p>Section 5</p>
<b>2. CONSERVATION</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>

<p><b>Neal Hendey, Managing Director HandMade Digita</b></p>	<p>I am writing with regard to the proposed draft conservation policy concerning the The Oxford Gardens/St Quintin Conservation Area.</p> <p>My family and I live in Bracewell Road and have done so for over 8 years now. We would like to add our view to the debate around the new conservation policy proposals.</p> <p>I believe that the streets on the fringe of the conservation area made up of Bracewell, Delgano &amp; Brewster should have less strict or formal restrictions applied. We have 2 primary concerns one being the ability to paint the outside of the house as the general house stock in these streets are not the same as the other houses in the conservation area and most of the houses have already been painted or even clad in some circumstances, changing this now would be unfair on the residents. Plus the brick used is also not the same or even uniform, it's mixed and I don't feel warrants such a strict approach as the houses in Wallingford for example. The second concern is around the ability to add front sloping roof lights, all the houses in these streets with loft conversions already have front sloping roof lights and to now exclude current residents from adding them just like their close neighbours would be unfair and cause tension within a much loved and close knit community.</p> <p>I believe votes for the policy would be lost over these issues and in my humble view a small change to the overall policy relaxing these two points should ensure that the new policies are carried through overall.</p>	<p>The Consultation Version of the StQW Plan acknowledges the strong views of residents of Bracewell Road, where houses have already been painted and have front rooflights. No new restrictions are proposed for this street.</p>	<p>Section 2</p>
<p><b>Georgina Hendy, Bracewell Road</b></p>	<p>I am writing with regard to the proposed draft conservation policy concerning the The Oxford Gardens/St Quintin Conservation Area.</p> <p>I have lived Bracewell Road with my family for more than 8 years. I would like to add our view to the debate around the new conservation policy proposals.</p> <p>I believe that the streets on the fringe of the conservation area, made up of Bracewell, Dalgarno &amp; Brewster should have less strict or formal restrictions applied. The 2 main concerns are:</p> <p>1) the ability to paint the outside of the house as the general house stock in these streets are not the same as the other houses in the conservation area and most of the houses have already been painted or even clad in some circumstances, changing this now would be unfair on the residents. Plus the brick used is also not the same or even uniform, it's mixed and I don't feel warrants such a strict approach as the houses in Highlever Road for example.</p>	<p>At the stage that the Pre-Submission Draft was published (December 2014) the proposed Action in the Draft Plan was to ask RBKC to introduce an Article 4 Direction removing Permitted Development rights on front rooflights and painting of front brickwork only in those streets covered by Direction 46/62 (the 'red-brick' streets). <b>Hence Bracewell Road, Brewster Gardens (west side) and Dalgarno Gardens would not be covered by these restrictions and house owners would continue to be able to undertake these alterations.</b></p>	<p>Section 2</p>

	<p>2)We have been led to believe that going forward the proposed policy will include a clause to restrict putting in front sloping roof lights. This is a more serious and second concern of ours. There are a number of reasons that this would be unfair and also restrictive.</p> <ul style="list-style-type: none"> <li>• there are already many roof lights on Bracewell, Brewster &amp; Dalgarno – to restrict others from adding them when they look out onto their neighbours everyday and see roof lights already would be unfair and divisive, not to mention create tension in a familial and tight community.</li> <li>• The front sloping roof lights also provide really necessary ventilation to the loft room and in no way would they negatively affect the insulation of the house. To remove the possibility of residents adding these in the streets mentioned above would be a unfair and do not seem necessary since these streets have already been painted, or clad or contain front sloping roof lights.</li> <li>• There is no street uniformity on Bracewell, Brewster &amp; Dalgarno currently, so it would be impossible to 'preserve street uniformity'.</li> <li>• This looks to be a punitive restriction on residents looking to update, restore and substantially improve their homes and therefore improve the overall appearance of our streets.</li> </ul> <p>It is highly likely that votes will be lost for the policy because of these issues but were these points to be re-addressed it is likely that the overall policy will get more support.</p>		
<b>Henrietta Esiri 56 Dalgarno Gardens W10</b>	The relaxation of the rules around back attic dormers would be very welcome as I badly need a 4th bedroom but could NEVER afford to move to a larger property within the area. My adult children still live at home and also my teenagers and we badly need more space. We are 4 in a 3 bed house. They love the area and I would hate to see them move out if they do not wish to.	Comment supports proposed StQW policies	Section 2
<b>Ruth Hillary 69 Wallingford Avenue</b>	I support the StQW Draft Neighbourhood Plan particular its protection of open spaces and St Quintin estate "backlands" and the red brick houses from being painted.	Comment supports proposed StQW policies	Sections 2 and 4
<b>Simon and Cecilia Sanders 26 Kelfield Gardens, W10</b>	My wife and I live at 26 Kelfield Gardens. We live next door to the only property (no 28) in our run with a dormer window, so on a daily basis are reminded of what we're not allowed to build ourselves! The windows at the back of our property allow us views of the backs of 3 surrounding streets of houses (Wallingford, Kingsbridge and Highlever) where (almost) all properties have a dormer, but alas it currently isn't an option for us. As such, we are fully in support of the StQW Neighbourhood Plan and particularly support the proposed change as regards rear roof alterations. Obviously this merely refers to the backs of the houses, not the view from the street.	Comment supports proposed StQW policies	Section 2
<b>Matthew &amp; Elizabeth Shaw 32 Kelfield Gardens</b>	We would like to write in support of the StQW Draft Neighbourhood Plan as follows: As a resident of Kelfield Gardens, we strongly support the proposed change regarding rear	Comment supports proposed StQW policies	Section 2

<p><b>London, W10</b></p>	<p>roof alterations (Section 2.3.1).</p> <p>The rear of our home overlooks Wallingford Ave, Kingsbridge Rd and Highlever rd. We can see dormer windows on the majority of properties and it seems unfair that we are not allowed to extend our own home in the same manner, even though our neighbour two doors down does have a dormer so the roof line is not unbroken.</p> <p>Furthermore, it is hard to see how this continued restriction in one section of our street ‘preserves or enhances the character of the conservation area’ as rear dormers are not visible from the street. We agree that front roof alterations should not be allowed but cannot see the logic in continuing to restrict extensions at the rear.</p> <p>We have discussed this matter with many of our neighbours who all agree that this level level of inconsistency is unfair and deserves to be changed.</p>		
<p><b>Mark Mathews</b>  <b>Town Planning Manager</b>  <u>Thames Water Property Services</u></p>	<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewerage undertaker for the area and is hence a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Development) Regulations 2012.</p> <p>Under the Water Industry Act 1991, Thames Water has a duty to ensure that:</p> <ol style="list-style-type: none"> <li>1. Its area is effectively drained and to effectively deal with the contents of its sewers; and</li> <li>2. To develop and maintain an efficient and economical system of water supply within its area.</li> </ol> <p>As set out in the National Planning Practice Guidance, that duty is mindful of available resources (including budgets) and requires the assistance of Local Planning Authorities in ensuring that development is adequately planned and phased so that infrastructure can be delivered ahead of occupation.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure.</p> <p>It is essential that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it</p>	<p>Comment supports proposed StQW policies</p>	

	<p>would not lead to problems for existing customers. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water, then the developer needs to contact Thames Water to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Within the RBKC Core Strategy Policies C1 and CE2 relate to the infrastructure delivery and flooding. In accordance with the requirements of Policy C1 and CE2 of the Core Strategy proposals for development sites within the Neighbourhood Plan area should ensure that there is adequate infrastructure to serve the development including water and wastewater infrastructure.</p> <p>In order to ensure that any developments proposed within the neighbourhood plan do not result in adverse impacts such as sewer flooding either on or off site it is recommended that additional supporting text is provided within the Neighbourhood Plan. This will be particularly relevant to the development sites listed in draft policy StQW 12. Some suggested text is provided below.</p> <p>Proposed new supporting text:</p> <p><i>“Developers will be expected to demonstrate that there is adequate water and wastewater infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water, developers will be required to demonstrate how any necessary upgrades will be delivered in advance of occupation to ensure compliance with Policies C1 and CE2 of the RBKC Core Strategy.”</i></p> <p><u>Policy StQW 2</u></p> <p>Thames Water support the requirement of Policy StQW 2(e) and the associated supporting text. The proposed policy to resist the introduction of non-permeable surfaces to front garden areas will assist in preventing any increase in surface water flows into the sewerage network.</p>	<p>Text has been added to Section 3 on Environment as Section 12 of Plan has been deleted.</p>	<p>Section 3</p> <p>Section 2</p>
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<p><b>David English Historic Places Adviser Historic England (formerly English Heritage).</b></p>	<p>Thank you for consulting English Heritage in respect of the St Quintin and Woodlands Draft Neighbourhood Plan. The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require English Heritage, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan.</p> <p>As English Heritage's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed your document against the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p><b>Detailed comments</b></p> <p>English Heritage welcomes the production of the St Quintin and Woodlands Draft Neighbourhood Plan, and the opportunity to comment on it. While there are no listed buildings in the neighbourhood area, it is clear that the historic character and appearance of this place, much of which is covered by the Oxford Gardens Conservation Area, is greatly valued by residents.</p> <p>This is evident in the way that the conservation area status permeates through the draft Plan, affecting a range of policy areas. English Heritage recommends that policies that build on the status of an area as a conservation area should be based on a thorough understanding of the area's historic and architectural character. Residents are well placed to judge this, as they have a deep knowledge of the area and its evolution often over long periods.</p> <p>Having a solid understanding of the special architectural or historic interest of the area, which has been widely agreed upon, helps improve the clarity and soundness of planning policies. It can also help reduce the perception that decision making is inconsistent, which you note in paragraphs 2.3.1 and 2.3.2. With this in mind we note that the Neighbourhood Forum is seeking to change and weaken some of the Council's conservation policies for this area (e.g. Objective 2, paras. 2.0.7, 2.2.2 and draft policy StQW 2a).</p> <p>The justification for this appears to be that the existing conservation area assessment has not been reviewed since 1990, with parts dating back to 1979. However, it is unclear from the Plan what measures you have taken to formally assess the character of the area before developing your policies; for example by using the Place Check toolkit developed by the Urban Design Alliance (<a href="http://www.placecheck.info/">http://www.placecheck.info/</a>), or the Oxford Character Assessment Toolkit (<a href="http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm">http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm</a>).</p>	<p>Comments generally support StQW Policies while suggesting that the evidence base for Conservation proposals will need to be robust. The Basic Conditions Statement for the Submission Version of the StQW Dragt Plan includes additional evidence.</p> <p>Agreed</p> <p>Agreed. Three of the members of the Forum's management committee are architects, and have accompanied RBKC conservation staff on walkabouts of the area.</p> <p>Detail on the justification for StQW Policy 2a, slightly relaxing controls over rear dormers, is included in the StQW Basic Conditions Statement.</p> <p>The StQW management committee considered use of the Place Check toolkit early in 2014 but was not convinced that its effectiveness would justify the resource input. Members of the management committee have taken part in three</p>	<p>Section 2</p> <p>Section 2</p>
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	<p>The lack of an up-to-date evidence base to justify the changes to the Council’s adopted policies that have been found sound at public examination, risks undermining elements of the area’s character. For this reason we are concerned that in the absence of a suitable evidence base to justify changes to the policy, this neighbourhood plan risks promoting unsustainable development as defined by the NPPF.</p> <p>We would recommend that you set out/make reference to the evidence that you are using to support the proposed policies, such as those on alterations to rear roof forms and rear extensions. Paragraph 2.3.2 makes reference to some analysis that has been undertaken. You should ensure that this is suitably detailed to demonstrate that the neighbourhood plan policies will preserve and enhance the existing character of the conservation area, and any sub-areas/different building types within it.</p> <p>We note that the Council are in the process of updating their conservation area assessments, so to avoid duplicating their efforts you may wish to consider waiting for that piece of work to be completed for the Oxford Gardens Conservation Area, before looking to adopt policies that seem to pre-judge its outcome. As part of the development of their area appraisal the Council should consult on the document, which would give your Neighbourhood Forum the opportunity to highlight any perceived evolution to the areas character.</p> <p>In our view this would help ensure you have a robust evidence base that justifies your policies, which will help give them greater weight in the planning process. As the boundaries for the conservation area and the neighbourhood area are different English Heritage is concerned that the measures promoted in this Plan will lead to an inconsistent application of planning policy across the Oxford Gardens Conservation Area.</p> <p>Unless the conservation area has distinct sub-character areas that can accommodate a variation in approaches to development proposals, which are not identified in this Plan, an</p>	<p>'walkabouts' of the area with RBKC Conservation staff, and Councillors.</p> <p>The evidence base on roofscapes is fully up to date and has been prepared by RBKC as part of its work on an updated Conservation Area Appraisal for Oxford Gardens. This roofscape map can be seen at page 15 of the Basic Conditions Statement.</p> <p>Analysis of roofscapes shows only one short section of Kelfield Gardens still having an 'unbroken' roofline.</p> <p>Agreed, including the importance of conserving the remaining original St Quintin backlands, one of which is at threat from development (see Section 4 and Annexe C of StQW Draft Plan).</p> <p>In the light of the statement on NPPF Paragraph 185 (that <i>Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation</i>) the Council agreed in early 2015 to defer public consultation on the new draft Oxford Gardens Conservation Area Assessment until the Examination of the StQW Draft Plan has concluded.</p> <p>The fact that the boundary of the StQW Neighbourhood forms only one part of the Oxford Gardens Conservation Area is an inevitable result of the StQW designated area having a smaller footprint than the Oxford Gardens CA. The StQW area corresponds closely to Character Area C of the Conservation Area, and has its own distinctive forms of housing.</p> <p>The Oxford Gardens Conservation Area has</p>	<p>Section 2</p>
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	<p>uneven application of policy is likely to harm the overall character of the area. We would encourage consistent policies on alterations to buildings of the similar types, or in similar areas, in order to protect the overall character for which the area was designated. We would suggest you engage with the Council on this matter as part of the discussions that will accompany the conservation area appraisal. We also note that the Draft Neighbourhood Plan only seems to consider the impact of works on a character and appearance of the conservation area where they can be seen from public vantage points (paras. 2.2.3 and draft policy StQW 2c).</p> <p>In line with paragraph 2.2.21 of our publication Understanding Place: Conservation Area Designation, Appraisal and Management (2011), we note that while public vantage points usually offer the best locations to understand the special character of an area, in densely developed urban environments where there are large numbers of views of the rear of properties from other houses or backland sites, as appears to be the case for the Oxford Gardens Conservation Area, the impacts of building works on private views within the conservation area should also be considered.</p> <p>Other more minor points that you may wish to consider at this stage, are the use of a better quality map that clearly shows the boundaries of both the conservation area and the Neighbourhood Plan area. The current map, coloured to include details of roof forms, only shows part of the conservation area, which makes it harder to understand its relationship with the Neighbourhood Area.</p> <p>The Plan also has policies about improving the environmental performance of buildings, including making alterations to walls and roofs to improve insulation (paras. 2.10.1-2). You may wish to make reference to English Heritage’s published guidance Energy Efficiency and Historic Buildings (2011), which has detailed advice on the application of Part L of the Building Regulations to historic and traditionally constructed buildings (<a href="http://www.english-heritage.org.uk/publications/energy-efficiency-historicbuildings-ptl/eehb-partl.pdf">http://www.english-heritage.org.uk/publications/energy-efficiency-historicbuildings-ptl/eehb-partl.pdf</a>).</p> <p><b>Conclusion</b> English Heritage supports the development of the St Quintin and Woodlands Neighbourhood Plan. We would encourage the Neighbourhood Forum to ensure that their conservation policies are supported by a strong evidence base, particularly where these diverge from the Council’s existing conservation policies, to ensure that they are sustainable and result in a positive strategy for the historic environment. Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object</p>	<p>distinct sub-character areas, as noted above.</p> <p>Other polices and 'Actions' in the Plan are designed to raise awareness of conservation controls, introduce new controls on overpainting brickwork in specified streets, and ensuring enforcement where policies are breached..</p> <p>The StQW Forum does not see a risk of <i>'undermining elements of the area's character'</i> or of <i>'promoting unsustainable development'</i> as a result of StQW Policies 2a to 2g.</p> <p>A better quality map is included in the Submission Version of the Draft Plan</p> <p>The StQW neighbourhood broadly corresponds to 'Area C' of the Oxford Gardens CA. It includes distinct character areas of 3 housing types (Edwardian red-brick terrace, Victorian up to 1930s mixed streets, and the 'cottage-estate' area around Oakworth Road. Different Article 4 regimes already apply between these 3 areas, and StQW Policies will likewise. This is not 'inconsistency' but careful fine-tuning of policies to reflect different house types and qualities of architecture and heritage.</p> <p>The impact of building works on private as well as public views has been weighed and considered in developing StQW Conservation policies, and StQW polices on Open Space.</p> <p>The StQW Forum considers the evidence base to be proportionate to the level of variation from RBKC Conservation and Design policies.</p>	<p>Section 2</p>
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	to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.		
<b>Darlene Forrester, Barlby Road W10</b>	<p>Thank you for compiling the St Quintin and Woodlands Neighbourhood Plan, very well put together and covers most of the concerns extremely well.</p> <p>However may I respectfully request that there is a clear statement, as originally unanimously voted for in the April 2014 newsletter, that Section 7 in the 'Suggested variations to RBKC policies' be added into the Neighbourhood Plan. That being : <b>"Side/infill extensions to be allowed full width without requirement for setback to original building and with max 3m height at Party Wall."</b> This should also apply to other proposals Unanimously Voted for in the April Newsletter too I feel.</p> <p>At the Ask Nick session with Cllr Nick Paget-Brown on 21st Oct 2014 I did speak with Jonathan Wade and he did say that RBKC planning are likely to drop the above stipulation but I do feel this does need to be mentioned to confirm fully that this will be the case.</p> <p>Otherwise I very much look forward to this coming year full of anticipation in moving forward with the Plan</p>	<p>StQW Draft Policy 2e) <i>for ground floor rear/side extensions within the StQW area, where the original external side passage is incorporated into the body of the house, to make no requirement for 'subordination' within the rear façade (via a small setback).</i></p> <p>This wording is intended to resolve the problem that some planning applicants have had, when they have been advised by RBKC that a 100mm 'setback' in the rear facade is required, preventing the use of sliding doors.</p> <p>While RBKC officers advise that RBKC Policy CL9 on 'subordination' does not require a setback, issues continue to arise as a result of differing interpretations by case officers.</p>	
<b>3. ENVIRONMENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
<b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd</b>	<p><b><i>Environmental quality: draft policy StQW 3:</i></b></p> <p><i>3a) where development impacts on the character and appearance of the StQW part of the Oxford Gardens Conservation area, to require that proposals reflect and respond to the ratio of existing building height to the unusually wide streets and pavements of the streets of the St Quintin Estate.</i></p> <p><i>3b) where development impacts on views and vistas within and from the StQW neighbourhood, to resist proposals which cause harm to, or fail to preserve or enhance, the character of the StQW part of the Oxford Gardens Conservation area.</i></p> <p><i>3e) to require that new development creates no harmful increase to the sense of enclosure of rear gardens of houses within the StQW part of the Oxford Gardens conservation area.</i></p> <p>Response: There is no evidence that the streets in the area are unusually wide (nor is there a consideration of what 'unusually wide' means) and there is a significant difference in the</p>	<p>The wording of StQW Policy 3a has been revised, in the Submission Version along with the reasoned justification, to reflect more precisely the characteristics of the area. The 1990 RBKC CAPS states <i>'Buildings are farther apart than elsewhere in the Conservation Area. There generally more than 22 metres between building lines and this, together with the limited height of the houses, results in streets of surprisingly generous proportions. Space behind and at the corner of terraces is also generous, and the consequent suburban openness is very important to the character and</i></p>	Section 3

	<p>character and appearance of streets across the StQW area.</p> <p>The policy should reference the wording of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in preserving or enhancing the character or appearance of the area. In seeking to introduce its own version of Conservation Area policy, the Neighbourhood Plan fails to have regard to national policy. Furthermore, there is no clarity as to what “no harmful increase to the sense of enclosure” actually means. It is noted that Policy 3(e) recognises that a sense of enclosure forms part of the character of the area.</p>	<p><i>appearance of the area</i>'.</p> <p>RBKC Policy CL5d already addresses the issue of 'harmful increase in sense of enclosure' and the LPA is familiar with interpreting this policy in a local context. The draft StQW policy refers specifically to sense of enclosure for rear gardens, which is a feature of the StQW neighbourhood.</p>	
<b>4. OPEN SPACE</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
<p><b>Frances Barrett (Miss)</b> <b>Oakworth Road</b></p>	<p>As a local resident (Oakworth Road) I was appalled to learn of the proposal of housing to be built on the Nursery Lane site.</p> <p>Two friends of mine (Miss Olive Mundy, 35 Nursery Lane and Miss Betty Wallace, 154 Highlever Road), both longstanding local residents, are also horrified. Recently the occupants of the Nursery Lane sheltered housing scheme have had to tolerate at least 18 months of deep excavation work and associated din in Highlever Road and that was only one house. The thought of 22 houses with underground parking space being erected with drills, cranes, lorries etc and the associated noise is too awful to contemplate. There is only one access road through which all the heavy traffic must pass. The building work would also include the installation of water, electricity, gas supplies and sewage.</p> <p>This tranquil oasis should not be violated by buildings. The green space is vital for the health and wellbeing of all who live round it. Recently the danger to health of exhaust fumes (containing particulates causing lung cancer and respiratory problems) has been highlighted and it is common knowledge that peace and quiet (especially for the elderly) is vital for mental wellbeing.</p> <p>I made my views known at the Pavilion Exhibition recently (as did Miss Mundy).</p> <p>To quote Mrs Thatcher "No, no, NO"!!</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan.</p>	<p>Section 4 and Annexe C</p>
<p><b>Amelia Slocombe and James Egert</b> <b>Local residents</b></p>	<p>We heartily support the proposal in the Draft Neighbourhood Plan to designate the Nursery Lane site as Local Green Space and for additional housing to be located elsewhere in the neighbourhood (Latimer Road and the site at Crowthorne Road). We are not opposing all new development and we believe that new housing should be located appropriately, not on open space that is an important feature of the Oxford Gardens Conservation area, has never before been developed, and where housing has previously been refused at two planning appeals.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

<p><b>Emma and Jason Mayo</b> <b>St Quintin Avenue</b></p>	<p>This is to say that Emma and Jason Mayo support the proposal in the draft plan to designate the Nursery Lane site as Local Green Space in W.10 and for additional housing to be located elsewhere in the neighbourhood; Latimer road and the site at Crowthorne Road.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Noelle Colfer,</b> <b>28 Dalgarno Gardens, W10 6AB</b></p>	<p>I have seen the proposed draft proposals for the development of 21 houses at this site (Nursery Lane), which my property at 28 Dalgarno Gardens overlooks and I want to register with you my strong opposition to these proposals on grounds of (i) overdevelopment of a small space (the number of houses could hardly be described as "low density" and is quite shocking in its scope),(ii) loss of a green space and associated biodiversity, in particular the wonderful weeping willow trees on the site which should have protected tree status and cannot be easily replaced, (iii)possible loss of light to my property with definite loss of outlook and increased noise/pollution issues and (iv) concerns about subsidence issues to surrounding properties which could be caused by the extensive basement proposals on a site with known water table issues.</p> <p>I fully support the alternative StQW neighbourhood plan which the local community had prepared and which deals in a realistic and sympathetic manner with the future use of this site and urge you all to reconsider the future use of this site.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Sir Stephen Waley-Cohen</b> <b>1 Wallingford Avenue, W10 6QA</b></p>	<p>I wish to comment on the above impending proposal (Nursery Lane housing proposals) whose consultation exercise at the Pavilion Pub I attended last weekend.</p> <p><b>I strongly support the proposal in the Draft Plan to designate the Nursery Lane site as Local Green Space</b> and for additional housing to be located elsewhere in the neighbourhood (Latimer Road and the site at Crowthorne Road). <b>New housing must be located appropriately, not on open space that is an important feature of the Oxford Gardens Conservation area, has never before been developed, and where housing has previously been refused at two planning appeals.</b></p> <p>In regard to the actual proposal, this is a very high density proposed development, with maximum heights (using mansard roofs), excessive basement area, inadequate surface level vehicle provision due to underground parking as well as underground rooms for each house; the impact on all adjacent houses will be significantly negative; the appalling loss of mature trees whose replacements will take decades to mature; insufficient consideration of the very large underground construction on the already damp subsoil area, and indeed the likely high price of these houses where similar concept (Argyll Place) are proving hard to sell.</p> <p><b>It is also essential, especially in W10, to provide affordable housing, whereas in this proposal it is intended simply to make a contribution to the Council for affordable housing elsewhere.</b> I oppose this project in its entirety.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p> <p>Section 4 and Annexe 2</p>
<p><b>Michael &amp; Kellie Weiss,</b></p>	<p>I received today your notice regarding the potential sale of the Clifton</p>	<p>RBKC declined to place this piece of land on the</p>	<p>Section 4</p>

<p><b>42 Brewster Gardens</b></p>	<p>Nurseries Site. We live at 42 Brewster Gardens and clearly have an interest in its future. We support an application to have the site placed on the Community Register of Assets and would like to get involved in its future.</p> <p>One question - does the Conservation Statement regarding not using it for housing explicitly cover this space?</p>	<p>Register of Community Assets, following the application submitted by the StQW Forum. The grounds for refusal were that <i>'The asset you have nominated does not, in the Council's opinion, further the social wellbeing or social interests of the community. The nomination therefore fails to meet the requirements laid out in Section 88, Localism Act 2011'</i>.</p>	<p>and Annexe 2</p>
<p><b>David Hucker and Kim Evans</b> <b>173 Highlever Road,</b> <b>London W10</b></p>	<p>We have seen the proposals for the development of the Nursery Lane green space and we wish to register the following concerns:</p> <ol style="list-style-type: none"> <li>1) The 6 day window for responding to the proposals shown on 12 and 13 December 2014 at The Pavilion, North Pole Road is not acceptable and is not indicative of meaningful community consultation. <i>(This was the timetable set by those proposing development of the site)</i></li> <li>2) The Nursery Lane plot is not suitable for the proposed development. It would result in an unacceptable loss of outlook and open space amenity and is detrimental to the traditional character of the area.</li> <li>3) We endorse the conclusion of the RBKC Planning Inspector in 1982 that the site is incapable of satisfactorily absorbing the proposed number of houses (23 proposed in 1982; 21 in your proposals).</li> <li>4) The buildings have mansard roofs which are not within the area's conservation policy</li> <li>5) The proposed development would involved the loss of mature willow trees, wildlife and biodiversity.</li> <li>6) It would impact on the outlook of houses around the site and from the sheltered housing.</li> <li>7) The basement construction would inevitably involve groundwater movement (Counter's Creek) that could only be detrimental to the surrounding properties.</li> <li>8) The developer will doubtless be aware of the lack of buyer interest in larger new houses in this area. For example, the new £4m town houses at Argyll Place/Pangbourne Avenue have not sold well.</li> </ol> <p>We wish to stress that we are not opposed to development within the area and we have supported proposals for additional housing to be provided in our community. However, housing needs to be located appropriately and not on open space that has never before been developed and which is an important feature of the Oxford Gardens Conservation Area.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

<p><b>Edward Gretton</b>  <b>16 Balliol Road London</b>  <b>W10 6LX</b></p>	<p>I am writing to confirm that I support the St Quintin and Woodlands Neighbourhood Forum Draft Plan to designate Nursery Lane as Local Green Space and to locate new housing in Latimer Road</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Henrietta Esiri</b>  <b>56 Dalgarno Gardens</b>  <b>W10</b>  <b>(earlier letter to RBKC re application to place site on Register of Community Assets.</b></p>	<p>I write to you as a householder whose garden backs onto the Nursery Lane backland site. I have recently joined with other neighbours to explore the idea of jointly making a bid for the site and I have written to you as part of the Nursery Lane Action Group to update you about this. However, I also wanted to write to you as an individual resident with my personal perspective.</p> <p>I really value the site. I have lived in my home for 15 years and we have 3 children. We chose the home because it had an open aspect with beautiful trees. The view from our home is spectacular and green. We did not realise the land could ever be built on as we were given to understand from local enquiries, that it was one of the protected backlands in the St Quintin's area. We could not have imagined the joy the ecological environment could bring. Our garden is absolutely full of birds and birdsong. My children are familiar with Jays, Goldfinches, Blue Tits, Great Tits, Wood Pigeons, Robins, Sparrows ( a sadly declining species), Blackbirds, Green Parakeets and Woodpeckers on a <i>daily</i> basis. I teach the piano from home, and when my students play, they are greeted with a chorus of birdsong in response! The students love this audience of wild birds, It is a really special environment and I think the trees and general semi-wilderness aspect of parts of the Nursery Lane site are a major reason for this.</p> <p>I am concerned for the trees. The willows were cut back a great deal last year I was anxious that they were being felled at the time, they were so dramatically altered. I think another tree was felled. We must protect these magnificent trees because they are very rarely found in London. I hope the council is aware of the wildlife and the trees in this plot and that they are being protected. It is so easy to remove such trees and so hard to replace them!</p> <p>I gather that historically the site has been used as a tennis facility, a school sports ground and allotments. I believe these are the sorts of uses which most benefit the community. I would love to see such uses continue and indeed for the community to have more access to the backland spaces. I believe the Conservation Area should continue to respect the original plans for the area of streets of houses with communal green spaces interspersed behind. I think the building of more housing would change the character of the area which is an unusually suburban area close to the centre of London.</p> <p>I am writing to strongly support the application to put the Nursery Lane site on the Register of Community Assets as an important green space.</p>	<p>RBKC declined to place this piece of land on the Register of Community Assets, following the application submitted by the StQW Forum. The grounds for refusal were that <i>'The asset you have nominated does not, in the Council's opinion, further the social wellbeing or social interests of the community. The nomination therefore fails to meet the requirements laid out in Section 88, Localism Act 2011.</i></p> <p>The StQW Draft Neighbourhood Plan proposes designation of the Land as Local Green Space, for reasons set out in Section 4 and Annexe C</p>	<p>Section 4 and Annexe C</p>

<p><b>Henrietta Esiri</b>  <b>56 Dalgarno Gardens</b>  <b>W10 (letter responding</b>  <b>to exhibition of</b>  <b>proposed housing</b>  <b>scheme on Nursery Lane</b>  <b>site, Dec 2014)</b></p>	<p>Dear SP Broadway (consultants to developers proposing a housing scheme for Nursery Lane)</p> <p>I am writing to respond to the plans for the proposed development of the Nursery Lane site. I think the amount of time given for this initial community consultation is far too short. One week is definitely insufficient. That being said, I have several other objections to these proposals:</p> <p>1) My first concern, as a householder who's garden backs onto the site, is the idea of houses being built on this site at all and definitely in this density. We enjoy the open green space, the outlook and the wildlife, the astonishing willow trees and the bird life. It is beautiful and very rare view in London. Since this site has never been built on I think it should be restored to the open green recreational site which it was originally intended to be. I agree with the decision of 1982 RBKC planning inspectorate, that residential development of this site for 23 houses, should be refused. It will change the character of the area and adversely affect my property.</p> <p>2) I am very concerned that the proposed housing is to have basements and underground car-parking in this density. The willow trees on the site are indicative of the underground water buried beneath. Where will that displaced water go? I already get a very boggy end of the garden if there is a heavy rainfall. The ground beneath is full of water. I don't think it is suited to this extent of basement development.</p> <p>3) I do not think the existing trees should be cut down because it will take many decades of new trees to reach the magnificent proportions of the willows in particular.</p> <p>4) The conservation area has housing of a different character, not the mock Victorian design proposed. All the surrounding homes are Edwardian or very late Victorian. Actually, the back areas with their open space are a feature of the layout of the original St Quintin's estate. It is an unusual feature to have these open triangular green spaces such as the Bowling Club and Nursery Lane Site. Removing one of these backlands is going to damage the area to change the layout of the estate.</p> <p>5) There are more suitable areas for housing development such as Latimer Rd industrial estates. The St Quintin's Neighbourhood plan discusses this and make proposals for other housing developments. Although we need housing in the local area, other luxury housing such as that in Argyll Place in Pangbourne Avenue have not been sold and remain empty.</p> <p>I therefore oppose the plans.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4  and  Annexe C</p>
<p><b>Susan Rudd Wilson</b></p>	<p>I write to oppose the planned development at Nursery Lane W10.</p>	<p>The StQW Draft Plan proposes this backland site</p>	<p>Section 4</p>

<p><b>Local resident</b></p>	<p>My reasons for this are many. I have lived in the area for 20 years and walk up Highlever daily and so am familiar with traffic flow and congestion.</p> <p>This area is densely housed, and traffic around the North Pole roundabout is often stationary right back along Barlby Rd causing considerable pollution which affects people shopping and using nice little cafes at North Pole Rd. Your development will increase traffic massively. All owners of these properties will have very large diesel cars (as is the norm here now) and may even expect as is common here, to run two each.</p> <p>The area has good wildlife and the Nursery Lane trees provide additional habitat for an excellent bird population in the Scrubs and greater area. There is concrete evidence that we are here on a migratory pathway for birds.</p> <p>Your drawings show very dense housing which from my experience can be stressful as insufficient space is provided. Huge housing developments are going on all across this area, from the tube at Latimer Rd to the Imperial site Scrubs Lane and it is unrealistic to use a green site to add more. I think careful thought needs to go into where new houses are built. The estate, so nearby has dense housing.</p> <p>I can see that more housing is needed, but due to the huge value of land in this area now, I fear we at a regrettable stage where any piece seeming to be without housing must be grabbed in order to make a large profit.</p> <p>The water table. In last year's winter gallons and gallons of water sluiced off the Little Scrubs into the council drains on Dalgarno Rd for weeks on end. Water lay on high ground on the Blg Scrubs during this period and big pools of water were common. Further development will exacerbate the existing problem of flooding and overloading the RBK&amp;C drains.</p>	<p>is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>and Annexe C</p>
<p><b>Daniella Geatti</b> <b>11 Wallingford Avenue,</b> <b>W10</b></p>	<p>I support the proposal in the Draft Plan to designate the Nursery Lane site as Local Green Space</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Michael Stewart</b> <b>58 Highlever Road, W10</b></p>	<p>Land at Nursery Lane: this land has always been a green area and should remain so. A particularly helpful use of the land, or part of it, would be as allotments, since I understand the allotments in St Quintin Avenue are to be destroyed. Allotments are particularly welcome by upper flat dwellers who are gardenless, and there were, I understand, many more applicants for the allotments in St Quintin Ave than could be satisfied.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Claudia Hutchings</b></p>	<p>I write as a resident of Highlever Road, and as a member of our local residents'</p>	<p>The StQW Draft Plan proposes this backland site</p>	<p>Section 4</p>

<p><b>57 Highlever Road London W10 6PR</b></p>	<p>association. I support the proposal in the Draft Plan to designate the Nursery Lane site as Local Green Space and for additional housing to be located elsewhere in the neighbourhood (Latimer Road and the site at Crowthorne Road). Our association does not oppose all new development and it is in this spirit that we have prepared a neighbourhood plan in order to ensure that new housing is located appropriately, not on open space that is an important feature of the Oxford Gardens Conservation area, has never before been developed, and where housing has previously been refused at two planning appeals.</p>	<p>is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>and Annexe C</p>
<p><b>Howard Napper, 54 Dalgarno Gardens, W10.</b></p>	<p>I am a homeowner at 54 Dalgarno Gardens, whose property backs on to the Nursery Lane backland site.</p> <p>I, like many of my neighbours, am naturally concerned about the recent move to sell the backland site and have wholeheartedly signed up to the newly formed Nursery Garden Action Group.</p> <p>What I have found so remarkable over the last week or so is the coming together of a community, the likes of which I have not seen before. This coming together on the whole is not so much to object to the possibility of turning the site into yet another over inflated luxury housing development, which is what I might have expected. But rather it has been to protect what I and many others consider to be perhaps the most valuable part of living in our neighbourhood - and that is this unique plot of land to which we are all connected.</p> <p>It is clear from the overwhelming response of the local community that this land means a great deal to so many people. I think in many ways we might have all taken it for granted in the past, assuming that it would always be there. But with recent developments and the thought of it now being removed from our lives, people have been moved and mobilised in ways that have quite frankly taken me, and my wife, by surprise.</p> <p>I am sure that the Council are in a very difficult position and are intent on doing the right thing, which clearly in this case is not so black and white. But I would strongly urge anyone involved with the decision making process to keep in mind that this piece of land, which at first sight seems rather neglected, actually means a great deal to many neighbourhood residents.</p> <p>As you can see from the response of the residents, we feel that is our right to try and protect this land as much as possible, as we feel that once it has gone it will be gone for good. And perhaps if we can protect it now, then we can protect it not only for our families, but also for all the families who will inhabit our homes in the future.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

<p><b>Nicola and Joshua Grinling</b>  <b>107 Highlever Rd W10</b></p>	<p>Thank you for your email up-dating us on the proposals for the development of 21 houses at Nursery Lane.</p> <p>We would like to let you know that we are very concerned about the impact such a development would have on this site. We feel there are other sites that would be far better suited to development in areas that would benefit greatly from re-generation, such as Crowthorne Road and Latimer Road. We have many neighbours and friends who live in the streets surrounding the Nursery Lane site and believe the proposed development would result in an unacceptable loss of outlook and open space amenity (planning already twice denied in 1972 and 1982 by the borough for this reason).</p> <p>The StQW Draft Neighbourhood Plan outlines some extremely useful and proactive ideas which we feel would fulfil the need for more housing in our community without detrimental impact; of basements in an area where an underground stream runs directly, the cutting down of some of the most beautiful and majestic weeping willows (creating a tranquil space rich in wildlife), of traffic and access - all very strong reasons we believe this is not the right site for development.</p> <p>The houses built on the former Princess Louise Hospital site are a prime example of what we hope will not be allowed on the Nursery Lane site. They are far higher in comparison to the original footprint of the existing buildings (and very ugly and unfitting in the surrounding community - our personal view as residents during the last 20 years) - we understand they are proving hard to sell. It seems that the existing plans for the prospective housing on the Nursery Lane site are similar in scale - very tall with mansard third floors - and with basements - in an area that has very few subterranean structures and very few third floors. It also seems from the plans, extremely densely constructed.</p> <p>We would be very happy to see more housing in our area but strongly feel there are local sites where re-generation is much needed and which would have less impact on wildlife, less impact on sense of space and amenity of surrounding housing and would be far more suited to the community which will be sorely affected by any decisions made in favour of developing the Nursery Lane site.</p> <p>We hope that the council will pay very careful consideration to us as long term local residents, who would be thrilled to see the already close community expand and thrive in the positive way that we envisage with our support for the StQW Draft Neighbourhood Plan - wherein we hope the Nursery Lane site will be designated as a 'Local Green Space'.</p> <p>With every hope that the council will look closely at our Neighbourhood Plan,</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
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<p><b>Mr D M &amp; Mrs MC Makromallis, Highlever Road, W10</b></p>	<p>My wife and I strongly support the proposal in the StQW Draft Neighbourhood Plan to designate the above as Local Green Space and strongly oppose any form of development on it as it has never been developed and where applications for housing have previously been refused at two separate planning appeals.</p> <p>More suitable locations for future housing endorsed by the local community have been identified in the Draft Plan namely Latimer Road and the site at Crowthorne Road which we support.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Steph Weatherill Brewster Gardens W10</b></p>	<p>This is entirely the wrong development in entirely the wrong place, and it is deeply cynical that development proposals have even been put forwards for this site.</p> <p>It is the wrong kind of development for all the following reasons:</p> <ul style="list-style-type: none"> <li>a) its density</li> <li>b) its style (which is totally out of keeping with the conservation area)</li> <li>c) its potential market - people in this area do not want more overpriced 'luxury' homes, as witnessed by the failure of the recent similar development on Pangbourne Avenue which remains still virtually unsold.</li> </ul> <p>These issues aside, the Nursery Gardens would be completely the wrong location for any development because it is one of the last open green spaces in W10 and is treasured by all those who live around it as a haven of tranquillity, a home for wildlife and the home of a number of trees that you rarely see in central London - specifically the healthy and vigorous willows in the centre of the site - all of which you are intending to cut down. There is absolutely no precedent for any development here since its creation as a public amenity - there have never been any buildings on the site - and two previous attempts to build on it were robustly refused by the council.</p> <p>The site is also the location of an ancient creek (hence the willows) and any attempt to divert the creek to make way for what promises to be a <b>HUGE</b> basement level (I notice with interest that you have yet to produce plans for this) will spell disaster for surrounding houses in terms of flooding and/ or subsidence.</p> <p>These and many other reasons are why I and every single other local resident I have spoken to will vigorously resist all your attempts to ruin our neighbourhood irrevocably.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>
<p><b>Alex McKenzie 136 Highlever Road W10</b></p>	<p>The (Nursery Lane housing development) proposal is unacceptable for the following reasons:</p> <ol style="list-style-type: none"> <li>1. constitutes overdevelopment - this is not a low density housing scheme as presented. However no density information/calculation was provided.</li> </ol>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

	<p>2. loss of sunlight and daylight to some properties  i) in particular to the south - the sheltered accommodation  ii) to rear of some properties at rear of Highlever Road , i.e. Nos 147, 149 etc</p> <p>3. the public space is of poor quality. The gardens are above garages. They will be overshadowed by the row of 3 storey houses.</p> <p>4. the private gardens at rear - especially the one facing sheltered housing - are too small</p> <p>5. Design - copied mansard roofs of Brewster Gardens, not Highlever Road with pitched roofs which allow more sunlight to pass over. The bay windows are square to maximise space. I believe that the material used, i.e. slate roofs does not match tiles of Highlever Road,</p> <p>6. Parking i) 3 storey entrance into the garages is very close to neighbouring properties in Highlever Road, in particular to Nos 147,149. The garage will affect the amenities of those adjacent properties as well as those of the sheltered accommodation. In addition it will create noise pollution.  ii) the drawing of the parking did not indicate if one or two cars will be accommodated. It showed schematically one car. This means that the 2nd car would be parked at Highlever Road where there is not enough spare capacity.</p> <p>7. The presentation at the Pavilion was very misleading. The drawings did not show any dimensions (i.e. height of building, width of streets and gardens). Also it did not provide any density of housing information. An artist was hired to provide 'an artistic view' that might not be the same as the proposed scheme.</p>		
<p><b>Josephine Waley-Cohen,  Wallingford Avenue W10</b></p>	<p>I wish to comment on the above impending proposal, whose consultation exercise at the Pavilion Pub I attended last weekend.</p> <p>The need for open space in this area with all the new building that is proposed in nearby areas is paramount.</p> <p><b>I strongly support the proposal in the Draft Plan to designate the Nursery Lane site as Local Green Space</b> and for additional housing to be located elsewhere in the neighbourhood (Latimer Road and the site at Crowthorne Road). <b>New housing must be located appropriately, not on open space that is an important feature of the Oxford Gardens Conservation area, has never before been developed, and where housing has previously been refused at two planning appeals.</b></p> <p>In regard to the actual proposal, this is a very high density proposed development, with maximum heights (using mansard roofs), excessive basement area, inadequate surface level vehicle provision due to underground parking as well as underground rooms for each house; the impact on all adjacent houses will be significantly negative; the appalling loss of mature trees whose replacements will take decades to mature; insufficient</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

	<p>consideration of the very large underdound construction on the already damp subsoil area, and indeed the likely high price of these houses where similar concept (Argyll Place) are proving hard to sell.</p> <p><b>It is also essential, especially in W10, to provide affordable housing, whereas in this proposal it is intended simply to make a contribution to the Council for affordable housing elsewhere.</b></p>		
<p><b>Holly Ross Top Flat, 15 Balliol Road, London W10 6LX</b></p>	<p>Thank you for your email up-dating us on the proposals for the development of 21 houses at Nursery Lane.</p> <p>I would like to let you know that we are very concerned about the impact such a development would have on this site. We feel there are other sites that would be far better suited to development in areas that would benefit greatly from re-generation, such as Crowthorne Road and Latimer Road. We have many neighbours and friends who live in the streets surrounding the Nursery Lane site and believe the proposed development would result in an unacceptable loss of outlook and open space amenity (planning already twice denied in 1972 and 1982 by the borough for this reason).</p> <p>The StQW Draft Neighbourhood Plan outlines some extremely useful and proactive ideas which we feel would fulfil the need for more housing in our community without detrimental impact; of basements in an area where an underground stream runs directly, the cutting down of some of the most beautiful and majestic weeping willows (creating a tranquil space rich in wildlife), of traffic and access - all very strong reasons we believe this is not the right site for development.</p> <p>The houses built on the former Princess Louise Hospital site are a prime example of what we hope will not be allowed on the Nursery Lane site. They are far higher in comparison to the original footprint of the existing buildings and we understand they are proving hard to sell. It seems that the existing plans for the prospective housing on the Nursery Lane site are similar in scale - very tall with mansard third floors - and with basements - in an area that has few subterranean structures and very few third floors. It also seems from the plans, extremely densely constructed.</p> <p>We would be very happy to see more housing in our area but strongly feel there are local sites where re-generation is much needed and which would have less impact on wildlife, less impact on sense of space and amenity of surrounding housing and would be far more suited to the community which will be sorely affected by any decisions made in favour of developing the Nursery Lane site.</p> <p>We hope that the council will pay very careful consideration to us as a long term local</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4 and Annexe C</p>

	<p>resident of 35 years, who would be thrilled to see the already close community expand and thrive in the positive way that we envisage with our support for the StQW Draft Neighbourhood Plan - wherein we hope the Nursery Lane site will be designated as a 'Local Green Space'.</p> <p>With every hope that the council will look closely at our Neighbourhood Plan.</p>		
<p><b>James Adams, 34 Brewster Gardens, W10</b></p>	<p>On the Nursery Lane site, local residents have demonstrated a preparedness to contribute money to buy the land or pay rent to the land owner and cover the costs to maintain it with a view to return it to its previous use for the benefit of the local community. In this context it could make more sense to develop residential housing stock on alternative brownfield sites such as in Latimer Road (if the council were able to re-designate a portion of it for this from its current commercial use) rather than developing back-lands in conservation areas. The commercial activities in Latimer Road would likely be better served by relocating to the nearby Old Oak area that is already and expected to become an even more substantial commercial hub in future.</p> <p>There are numerous irreversible and major impacts and risks that are of concern e.g. visual, hydrological etc., which need to be independently assessed.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	
<p><b>Kim Pither and Colin Davies 134 Highlever Road,W10</b></p>	<p>I am writing with regard to the proposed development of the Nursery Lane Green space and wish to register our thoughts with regard to this.</p> <p>I have lived in the area for over 20yrs and as a consequence, seen all the redevelopments that have occurred.. Some have been extremely positive for the area, such as a the Pall Mall building, and the Ink Building. However, what with the Ladbroke Grove, the Portobello Green, Pangbourne Avenue and even Portobello Docks, I question the necessity for another new build development.</p> <p>I understand that the land has been sold to a private investment company, and that they intend to build 20 new houses. As I mention above, I question whether or not the area needs these. Portobello Docks could not sell and so was rented to Innocent as their Headquarters. Pangbourne Avenue has not been a success, in fact the Developers there are losing more money on the unsold properties than any other development they've been involved in (it was mentioned for example that if somebody offered to purchase all the unsold properties for half the registered price, they would accept!)</p> <p>New builds do not come with parking permits, as a consequence, they are not so popular with wealthy purchasers who understandably want to park outside the</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	

	<p>local shops and schools without fear of tickets! The underground parking that is obviously necessary would have to be huge, this would most definitely have an adverse effect on Highlever Road and Brewster Gardens (two basements on St Quintin Avenues have resulted in the neighbours being flooded on a number of occasions.</p> <p>When we re-developed our house on Highlever Road, it was made quite clear to us that a basement would not be acceptable, and there were very strict guidelines on what we could and could not do.. For example, the roof had to fall within certain guidelines. I notice from the proposed drawings that the mansard roofs are substantially higher than those of our properties, and what with the basement that appears to be a "given", I wonder how this can be - seems like double standards, and I would like to know why a property developer is allowed to sideline these restrictions when Individuals cannot? Do they simply pay to get "around" these?</p> <p>Lastly, and this is by no means, the least of our concerns, the conservation of the area. The Legard family have owned this land for many years. Under the current occupancy, Clifton Nurseries, it is use as a dumping ground, we understand that this is a travesty, it should be utilised properly, but as William Herbert St Quintin who died in 1933 dedicated much of his life to conservation (specifically of birds), surely there is something that can be done which can benefit all and create an area of beauty and tranquillity? The trees for a start are well over 100 years old and are something of real beauty.</p> <p>There has been mention of sports facilities, tennis courts similar to the Ashfield Tennis club that was on the space, a swimming pool which would certainly generate a great deal of local support and would add to the area, perhaps even allotments in part of the area so that locals, specifically the nearby elderly residents, as well as local families, could have somewhere to convene as a community.</p>		
<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd. (These representations on behalf of the prospective developer of the Nursery Lane land run to 16 pages.</b></p>	<p>This Representation demonstrates that the Draft StQWNP proposed designation of the land to the west of Highlever Road as 'Local Green Space' does not have regard to national policy. Specifically, NPPF sets out a series of necessary tests, in Paragraph 77, which must be met, if a site is to be designated as Local Green Space. The proposed designation does not pass these tests and consequently, the site cannot be designated as Local Green Space. If the designation were to remain in the Submission Version of the Neighbourhood Plan, then the Neighbourhood Plan would fail to meet the basic conditions and its policies could</p>	<p>Annexe C to the StQW Draft Plan sets out the basis on which the StQW Forum believes that the Nursery Lane meets the tests in NPPF Paragraph 77. These are matters for the Examiner of the Draft plan to decide.</p> <p>Should the Examiner decide, having examined all</p>	



<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>superseded by the NPPF). This typology included a range of spaces which may be of public value; including natural and semi natural greenspaces, green corridors, amenity green space, allotments/city farms etc.</p> <p>A full and thorough assessment of the open spaces in the borough was undertaken by the Council using the methodology set out in Section 7.0 of the Audit and the results of the audit are shown on Map I and Annex II of the Audit. The audit includes an indication of the size of the spaces identified as 'open space'; these range from places such as Brompton Cemetery (15.2 hectares) to Pembridge Villas (50sqm). The application site, which is 4,800sqm (0.48ha), is not identified within the audit as constituting open space in the Royal Borough.</p> <p>This audit comprised a fundamental part of the RBKC evidence base for the Core Strategy. It was detailed and comprehensive. Crucially, it was subject to robust examination as part of the local planning process. It is clear from all of the evidence that RBKC, having considered the site, found that it had no public value as open space, or that it made any significant contribution to local amenity or to wildlife habitat. There is no grey area in this regard.</p> <p>Further to the Open Space Audit forming part of the evidence base used by RBKC in preparation of the Core Strategy, the land at Nursery Lane was not designated as open space. The only designation that applies to the land is that pertaining to its location within the Oxford Gardens Conservation Area.</p> <p>The description within StQW Policy 4(a) of the land at Nursery Lane as being Private Open Space does not accord with the Council's audit of open spaces and its definition of what constitutes open space. The Core Strategy uses the same definition of open space as London Plan (set out above). Furthermore, Core Strategy Policy CR5, which relates specifically to (defined) private open space, does not apply to land that does not comprise open space. Consequently, the Neighbourhood Plan misapplies Core Strategy Policy CR5.</p> <p><b>Local Green Space and the NPPF</b> StQW Draft Policy 4(a) proposes the designation of the land at Nursery lane as</p>	<p>whereas the 1979/90 Oxford Gardens CAPS was (at the time of its adoption).</p> <p>The 2004 RBKC Audit was one of many documents of supporting evidence to the Core Strategy. Given that the Audit listed 339 open spaces (of which Nursery Lane was not one) this makes it unlikely that this specific issue was 'robustly examined' in the process of Core Strategy adoption. The fact that the 2004 Audit did not include the Nursery Lane land does not lead to the conclusion that RBKC has <i>'found it had no public value as open space'</i>. The Council has confirmed that it will be applying RBKC Policy CR5 to the land at Nursery Lane, in the event of a planning application. The policy statement in the Oxford Gardens CAPS is more relevant to the Council's views on the land.</p> <p>This audit was not an exercise in 'designation'</p> <p>The RBKC response to the StQW consultation states in relation to proposed StQW Policy 4a <i>'RBKC Policy CR 5 Parks, Gardens, Open Spaces and Waterways a.iii)</i> states the Council will resist the loss of private communal open space and private open space where the space where the space gives visual amenity to the public. Policy CL1 which relates to context and character will also be relevant together with Policy CL3 which relates to conservation areas and historic spaces. <i>Development of any of these spaces will need to be assessed with these policies in mind.'</i> The Neighbourhood Plan does not 'misapply' RBKC Policy CR5</p> <p>The StQW Forum appreciates that the three LGS designations proposed in Draft Policy 4(a) which each have to meet all three of the NPPF tests. It</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>Local Green Space. As highlighted previously Paragraph 77 of the NPPF states that <i>“Local Green Space designation will not be appropriate for most green areas or open space. “</i></p> <p><i>The designation should only be used:</i></p> <ul style="list-style-type: none"> <li>- <i>where the green space is in reasonably close proximity to the community it serves;</i></li> <li>- <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li>- <i>where the green area concerned is local in character and is not an extensive tract of land.</i></li> </ul> <p>The NPPF requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land. Local Green Space is a therefore a highly restrictive and significant policy designation. The NPPF states that <i>“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.” (Paragraph 76)</i></p> <p>The designation of Local Green Spaces is a matter not to be undertaken lightly. Thus, it is essential that the requirements for designation, as set out in Paragraph 77, are met. The NPPF is explicit in stating that a Local Green Space designation is not appropriate for most green areas or open space and therefore compelling evidence should be provided to demonstrate, beyond doubt, that any such designation meets national policy requirements.</p> <p>However, it is clear that the application site does not meet the tests for designation of Local Green Space as set out by the NPPF. Its allocation does not, therefore, have regard to national policy and does not meet the basic conditions.</p> <p><i>“The green space is in reasonably close proximity to the community it serves”</i></p> <p>The site is close to the local community however it does not, as private land used for commercial purposes, serve this community. Furthermore, it provides only limited visual amenity to surrounding residents owing to it being largely secluded by the housing that surrounds it. The site is gated and locked and has remained inaccessible to the public for over fifty years comprising land associated with storage and planting and used primarily as</p>	<p>believes that, on all the evidence available, the Nursery land meets the second as well as the first and third tests.</p> <p>The StQW Forum agrees that the Local Green Space designation is both significant and <i>'highly restrictive'</i>. That is the intention of StQW Policy 4(a). In relation to Nursery Lane, the policy reflects the direction and intent of the similarly highly restrictive backlands policy in the Oxford Gardens CA and the 1982 decision by a Planning Inspector.</p> <p>The StQW Forum is not <i>'taking lightly'</i> the proposed LGS designations in Policy 4(a). They reflect stated RBKC policy, and past planning decisions on the 3 areas of land involved.</p> <p>As above, a judgment on whether the Nursery Lane site meets LGS criteria is not <i>'clear'</i> and is for the Examiner of the StQW Plan to decide.</p> <p>It is private land originally provided for communal recreational use, and used as such until the 1960s. Subsequent continuous use has been by one commercial tenant, a leading horticultural</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>contractor's stores. At a recent meeting with the tenants of the Nursery Lane site (Clifton Nursery Holdings) they confirmed that the site had been used principally as a 'holding yard' for the past 10 years plus and had also been used by various contractors that the company works with.</p> <p>The StQW forum sought to have the site designated as an Asset of Community Value in 2014. This application was rejected by RBKC on the 4th August 2014 on the following grounds:  The Clifton Nurseries site is not currently, nor in the recent past has it been, in a use that furthers the social wellbeing or social interests of the local community. The definition of land of community value as set out in Section 88 of the Localism Act 2011 is therefore not satisfied and the nomination is refused.  The Council has therefore established that the site is not used for a purpose that serves or benefits the community. This is a key consideration. It confirms that the use of the site has been objectively StQW Neighbourhood Plan Consultation Draft 23 January 2015 scrutinised in the recent past. There can be little doubt that the site does not serve the local community. In this regard, the proposed allocation of the site as Local Green Space fails to have regard to national policy and does not meet the basic conditions.  "The green area is demonstrably special to a local community and holds a particular local significance"</p> <p>The site is not (as required by the NPPF) demonstrably special to the community; it comprises a degraded low quality environment which the public has had no access to for decades.</p>	<p>and garden firm with the motto '<i>inspiring gardeners since 1851</i>'.  The Examiner of the StQW Plan will need to consider what this use has been, in terms of planning legislation. There is a great deal of evidence (from those who lived round the site over this period, and from that considered at the 1982 planning inquiry) that this use has been horticultural and not as a 'holding yard'. How the tenants of the land have used the site in recent years (and how it is being used today) are only part of the establishing the lawful planning use.</p> <p>The statutory criteria for designation as an Asset Of Community Vale are very different to those for Local Green Space. ACV designation requires evidence that <i>The current use (or use in the recent past) of the building or land furthers the social wellbeing or interests of the local community as its primary purpose</i>. What constitutes 'recent' is a matter of interpretation. 'Primary purpose' is fairly clear.  The StQW Forum accepts the RBKC decision on the ACV designation, but this has limited relevance to satisfying the very different criteria for LGS designation (including <i>beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife</i>). Hence the ACV decision by RBKC is not a 'key consideration' in respect of StQW Policy 4(a).</p> <p>This for the Examiner of the StQW Draft Plan to decide, in the light of evidence in this Consultation Statement and elsewhere. The 'degrading' of the site in January/February 2015 is a recent phenomenon, as photographs will show.</p> <p>In addition to the 'just 42 houses/flats' which back immediately onto the Nursery Lane land there are 35 flats in the sheltered housing.</p>	
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<p>Rolfe Judd Planning, on</p>	<p>The background information pertaining to the proposed allocation suggests that the site comprises a local “cause-celebre.” However, in reality the site has severely limited significance to the local community. In addition to the facts that the site has been a private commercial operation, with no public access, and has been found not to further social wellbeing or the social interests of the local community, only those properties adjacent to the site have any kind of direct view across it. Furthermore, such views are of a degraded environment that detracts from the character and appearance of the Conservation Area. In the above regard, just 42 houses/flats bound the land along with additional residences within the residential care home to the south. In total, this amounts to approximately 0.2% of the total number of households in the StQW Forum area (1700 as noted in para 0.1.12 StQWNP).</p> <p>There are very limited glimpses of the site from outside of Nursery Lane and these are principally directly from the junction of Nursery Lane and Highlever Road or through small gaps between houses. Any possible visual amenity the site provides is therefore limited to a very small geographic area and a very small percentage of the local population. In addition, it is noted that the sustainable development of the site would conserve the character of the Conservation Area – a national and local policy requirement – and enhance rather than diminish visual amenity.</p> <p>Taking each of the examples of “local significance” provided by the NPPF into account: Beauty: The site is not ‘beautiful’. An objective, professional assessment has provided evidence to demonstrate that the site has a negative effect upon the character and appearance of the Conservation Area. Richard MacCullagh of RMA Heritage has assessed the site in relation to the Oxford Gardens Conservation Area, a designated heritage asset. Mr MacCullagh notes that:  “The site is accessed via metal gates from Nursery Lane and has a close-boarded fence and hedge to its southern boundary. The overriding impression of the site is that it is unkempt, with various skips, shipping containers, timber pallets, building materials, potted plants and debris dumped throughout creating a poorly managed land use. Apparently landscaping contractors have used it as a dumping ground for some time.”</p>	<p>These residents, and their visitors and families, would strongly contest the assertion that the views, sense of openness and tranquillity provide by the current land (in the many years when not, as present, used as a land tip) have meant little or nothing to their lives. Responses in this consultation statement demonstrate what the site means to those who live round it and in the wider neighbourhood. Evidence of resident views from the 1972 and 1982 planning inquiries shows the same story. The fact that there is less demonstrable evidence to show from 1982 to 2014 is that those living round the site (including recent house purchasers) had assumed that the very clear and site-specific planning protection in the 1979/90 CAPS site meant exactly what it says. Only recently has the local community come to understand that this policy statement carries limited (or even 'very limited') policy weight. There is no information on the RBKC website, when visitors to the site read or download this document, that carries any such proviso. LGS designation as proposed on StQW Policy 4(a) will retrieve this regrettable situation and enable RBKC to continue to honour its policy commitments.</p> <p>This 'objective, professional assessment' is from a commissioned consultant who is no doubt well qualified but who is likely to have seen the site only in winter months and in its recent highly 'degraded' state. His views must be weighed against the consultation responses which are set out above, and the photographic evidence which will be provided to the Examiner.</p> <p>This piece of land, with its magnificent row of willows, is most certainly a thing of beauty, albeit that it has not been looking its best in the period since a potential housing developer became</p>	
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<p><b>behalf of Metropolis Property Ltd.</b></p>	<p>He notes in relation to the Conservation Area that:  “...the site, in its present dilapidated, overgrown and underutilised state, detracts from the character and appearance of the conservation area and is unlikely to redeem itself in its current use.”</p> <p>The site is not locally significant because of its “beauty.”</p> <p>Historic Significance: Any historic significance related to the development of the St Quintin Estate is limited particularly given the evolution of the estate and the current use. Mr MacCullagh has undertaken a thorough review of the history of the area and its evolution through time and the opportunity for residential development and concludes that:  <i>While historically there is evidence that it was once used for tennis courts when it covered a much larger area, this use is likely to prove unviable today on a smaller site, plus it has trees which are worthy of protection. There are other leisure uses nearby with a bowling green behind Pangbourne Avenue and tennis courts at the Kensington Memorial Park, and the site is just a few minutes’ walk from the 7.2 hectare park at Little Wormwood Scrubs. Our historic research showed that much of St Quintin Park was given over to leisure use as cricket and tennis grounds, before the streets were developed and as they were laid out some tennis grounds were moved to make way for new housing such as Highlever Road south of St Quintin Avenue, and when they did exist in backland spaces these were mostly developed to meet community and housing needs. So what is proposed here is just an evolution of this process and better to retain these leisure uses where they currently exist in a viable form.</i></p>	<p>involved.</p> <p>It is noted that in the comments from Richard MacCullagh, he is careful to qualify that his view that the site detracts from, rather than enhances the Conservation Area, by reference to its <i>present dilapidated, overgrown and underutilised state</i>. There is no reason to assume that this state will prove permanent.</p> <p>The development of the Quintin Estate is well documented in several records, including the <i>Survey of London: Volume 37, Northern Kensington. Originally published by London County Council, London, 1973</i>. This work has been available to local residents for several years via a link on the St Helens Residents Association website (<a href="http://www.sthelensresidents.org.uk">www.sthelensresidents.org.uk</a>). Many local residents (as elsewhere in Kensington) are familiar with the history of the proud of its exceptionally rich heritage of the Royal Borough. Neither Rolfe Judd Planning nor their consultant would seem to well qualified to comment on the importance to local people of the history of the area, and the fact that its backlands are a significant part of its heritage.</p> <p>The Rolfe Judd comments about <i>'evolution through time'</i> and <i>'the opportunity for residential development'</i> on the St Quintin Estate are not understood. The original backland site off Barlby Road (now Blakes Close) was developed as social housing in the early 1990s after a previous housing development was refused on appeal. It is clear that the RBKC decision was influenced by the time-limited availability of Housing Association funding. The backland behind the northern end of Highlever Road has been developed by RBKC for high priority social and community use (a childrens centre). The remaining backland sites at West London Bowling</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>Furthermore he notes that <i>The Conservation Area Proposals Statement also emphasised the importance of these backlands to the conservation area, however from our detailed assessment of the site and conservation area, we consider that the site is not that significant compared to the more important public spaces of the St Quintin Gardens triangle and the tree lined streets and avenues of late 19th and early 20th century terraces and semis that make up the bulk of the St Quintin estate. There are also very limited views into the site, so the proposed development could be achieved without having much visual impact on the streetscape of the surrounding streets. The historic significance of this backland has been compromised anyway when the southern half was rather crudely developed as sheltered housing in the 1970s and the northern half appears very different to how it looked in the inter-war period. Also taking account of Paragraph 86 of the PPS5: HEPPG (see para. 6.17 above), we would argue that this part of the conservation area is not as sensitive to change as the more cohesive and architecturally special streets to the southeast of the conservation area.</i></p> <p>Annex C of the Neighbourhood Plan suggests that the site’s contribution “as an original feature of the Conservation Area” represents its historic significance. Further to the detailed information above, it is noted that there is no substantive evidence to support such a contention. The site does not contribute to the Conservation Area, but detracts from the Conservation Area’s intrinsic qualities. It is noted that, in reaching its conclusion, Annex C refers to a historic planning application. This was for an application made more than three decades ago under an entirely different planning system.</p>	<p>Club and behind Kelfield Gardens remain very much in their original state and are the subject of proposed LGS designations. The StQW Forum is not aware of any document anywhere which refers to the Nursery Lane site as a <i>'residential development opportunity'</i> prior to the marketing brochure published by Knight Frank in early 2014. This 'designation' of the site has no basis in RBKC Policy nor in the planning history of this piece of hitherto undeveloped land. It is a second attempt by the owners o of the land to capitalise on a perceived asset and appears to result from the owners of the land having been alerted in December 2013, by the StQW Forum, that a neighbourhood plan was in preparation.</p> <p>The contribution of these backlands to the Conservation Area will no doubt be commented on in the revised Conservation Area Appraisal, currently being prepared by RBKC. If the view of the conservation value of these backlands, and the need for them to be protected from housing development, varies from the current CAPS document, local residents will require an explanation given that very little has changed since 1990 in the surrounding streets.</p> <p>The history of the 1982 planning appeal, which led to a decision to refuse an application from the Legard family for 23 private houses on the Nursery Lane land, remains relevant today. The evidence submitted (included that from RBKC) remains pertinent. Aspects of the planning system may have changed, including the introduction of neighbourhood planning and of a Local Green Space designation, but these do not alter the setting in which the Nursery Lane sites, or its relationship to surrounding buildings and the wider neighbourhood which remain the same as in 1982 and 1990 (when the Oxford Gardens</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>The site is not locally significant due to its “historical significance.”</p> <p>Recreational Value: The site has no recreational value (including as a playing field). There has been no public access to the site for over fifty years.</p> <p>Rich Wildlife: An Ecological Report prepared in respect of Metropolis Property Ltd’s forthcoming planning application identified that the site has very limited ecological value. The report prepared by AA Environmental Ltd identified that there are no habitats of international, national, county or local importance that would be directly or indirectly affected and the species recorded on the site can be described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.</p> <p>However, the Report did identify the presence of an invasive plant species - Japanese Knotweed. This is a particularly invasive, alien species. It is unattractive and can be costly to remove.</p> <p>An Arboricultural Implications Report has been prepared by Simon Jones Associates. This has assessed the trees on the site as having limited amenity value. This assessment was undertaken in consultation with the Council’s Tree Officer and included an Arboricultural Impact Assessment which included detailed assessment of the health and status of the tree and include an assessment of any visual amenity to neighbouring properties. The report concluded that:</p> <p>On the basis of our detailed assessments of the quality of the weeping willows (including the remaining specimens subject of the TPO), and of their limited contribution to the amenity of the locality from external public viewpoints, we consider that their removal will have no significant impact on the character or appearance of the Conservation Area.</p>	<p>CAPS was adopted).</p> <p>The historical significance of the site is for an Examiner of the StQW Draft Plan to decide.</p> <p>The site is not currently used for recreation but was the Ashfield Tennis Club until the 1940s and was subsequently part used as playing fields by Latymer School. It has obvious scope recreational use in the future, should land ownership change.</p> <p>In terms of ecological value, the Nursery Lane land is close to the Wormwood Scrubs Nature Reserve (a Reserve across the borough boundary in LBHF, designated in 2002). This is one of the largest areas of common land in London and where over 100 species of birds have been spotted (see at <a href="http://www.wildlifeextra.com/go/uk/wormwood-scrubs.html#cr">http://www.wildlifeextra.com/go/uk/wormwood-scrubs.html#cr</a>)</p> <p>Birds are no respecter of borough or site boundaries.</p> <p>The prevalence of Japanese Knotweed as reported by Rolfe Judd Planning, has been passed on the current owners and tenants of the land with a reminder of their legal duties in this respect.</p> <p>The StQW Forum has been assured that the trees on the site (of which there are a large number, giving the land is quality as amenity space for all those with views of it) will be checked by RBKC Arboricultural Officers. The StQW Forum does not see how Simon Jones Associates are in a position to assess the value of visual amenity. The conclusion that all trees can be removed without impact on the character and appearance of the CA will be strongly contested at Examination of the StQW Plan, with photographic</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>Taking all of the above into account, the site is not locally significant due to the “richness of its wildlife.” On the contrary, its trees only make a limited contribution to local character, there is no locally significant wildlife and it is infested with Japanese Knotweed.</p> <p>Tranquillity: The site is not accessible. It does not provide for tranquillity. Further to the above, it is noted that, given the forthcoming planning application, the current use of the land is limited. Despite this, the site is still visited on a daily basis by a number of trucks and vans collecting or delivering items to site and is not particularly conducive to tranquillity.</p> <p>The site is a commercial property and whilst it is currently under-utilised, there are no planning restrictions on the major intensification of the current use. Nor are there any planning conditions that would prevent activities occurring later during the day or at weekends.</p> <p>Annex C of the Neighbourhood Plan is incorrect in stating that the “tranquillity of the site...is a significant factor in meeting the NPPF criteria for meeting Local Green Space.” The site is not tranquil and there is no (and has not, for several decades, been any) opportunity for the community to access the site for purposes of tranquillity.</p> <p>The site is not locally significant for reasons of tranquillity.</p> <p>For land to be considered to be capable of designation as Local Green Space it must meet the criteria set out in paragraph 77 of the NPPF. The site only complies with one small part of the national policy requirements – it does not comprise a large tract of land – but fails on all other counts.</p> <p>The draft Neighbourhood Plan confirms in paragraph C.1.3 that the Council does not accept that the site is demonstrably special to the local community and holds a particular significance for the community. The evidence above strongly supports the views of the Council in this regard.</p>	<p>evidence. RBKC Core Strategy Policy CR6 on Trees and Landscape requires the protection of existing trees, and CR6(b) resists development which results in the damage or loss of trees of townscape or amenity value. The Council’s Tree Strategy makes clear the importance to the Borough of mature trees in public parks, garden squares, and private open spaces.</p> <p>This is for an Examiner of the StQW Draft plan to assess.</p> <p>It is not necessary to be standing on a piece of land to experience its tranquillity, as is self-obvious. The RBKC Core Strategy recognises the huge value to the borough of its private squares and gardens, created by landowners who well understood to sacrifice a quantum of commercial gain to provide central London with the 'green lungs' and 'breathing spaces' required of a high density city. These include WH St Quintin and the StQW Forum regret that his descendants do not share his vision of the Estate that he laid out.</p> <p>Current vehicle trips to the land bear no comparison to those generated by a development of 21 houses, using a relatively narrow access road.</p> <p>The planning permissions granted on this land are few, given the history of its continued use as a garden nursery business since the 1950s. In April 1953 the LCC granted permission in 1953 for 'storage of plant and materials in connection with a garden contractors business', subject to the land not being used for any other purposes and excluding use of a power saw to <i>'to safeguard the amenity of surrounding properties'</i>.</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>fulfilled. This precise analysis is not key to determining whether the second criteria is fulfilled. However, considering the characteristics of the site (which arise from the use of the site) is important in determining whether the second criterion is fulfilled.</p> <p>It is our view that the historical and current use and characteristics of the site (as discussed above) rather than whether the site falls precisely within the NPPF definition of 'Previously Developed Land' is more appurtenant to the consideration of the Local Green Space NPPF tests. However, demonstrating that the site exhibits many of the characteristics of 'previously developed land' does provide additional support against the site being considered a Local Green Space.</p> <p>One of the 12 Core Principles of the NPPF (paragraph 17) and Paragraph 111 of the NPPF highlight that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.</p> <p>The NPPF defines previously developed land as: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.</p> <p>The site was developed firstly as a tennis club which required a comprehensive remodelling of the land and the addition of buildings. Following the war the use comprehensively changed to a commercial business, which changed the character of the land and involved sheds and greenhouses, storage of plants, equipment and other apparatus used with a commercial nursery/garden centre and ancillary horticultural use focussed on the sale of plants and trees. This use has changed over the years to a depository and contractors stores where there are regular deliveries to load or unload refuse, equipment and plants etc. This has been confirmed with the current tenants. This use is as a commercial depot and storage site and given the bespoke nature of the uses would be considered sui generis.</p>	<p>the Examiner will wish to consider.</p> <p>NPPF, London Plan and RBKC planning policies support building on brownfield rather than greenfield land.</p> <p>The StQW Forum has seen no evidence of a 'comprehensive remodelling of the land' for or by the Ashfield Tennis Club. Tennis courts require flat open space, as the site has always been and would have been when the Estate was first laid out. Residents in the neighbourhood who remember the tennis club recall a modest pavilion building (wooden). There is no evidence on RBKC files of permission being applied for, or granted for, more substantial (or permanent) buildings. The aerial photograph of the site in 1931 confirms the above in relation to that date.</p> <p>The use did <b>not</b> 'comprehensively' change after the war. Following use as allotments, garden nursery use started in a small way on part of the site. From 1953 to the early 1960's a Mr Green</p>	
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<p><b>Rolfe Judd Planning, on behalf of Metropolis Property Ltd.</b></p>	<p>It is clear that the site is not 'private garden land enclosed within the curtilage of a</p>	<p>was using part of the site for garden nursery activity, with the approval of the LCC. In 1959 planning permission was given for the erection of a sectional timber hut on the playing field, for use as an equipment store and changing room, probably as part of use by Latymer School.</p> <p>Clifton Nurseries (formerly Highgate Nursery) then became involved with the site and appear to have expanded their use during the 1960s. So the process of change from recreational to commercial use was a slow one, over two decades.</p> <p>While these tenants (Clifton Nurseries) may have changed over time exactly how they use the land, the fact remains that this company is and always has been a garden nursery business. It has not moved into building construction or contracting, or 'depot' management. Hence there must be room for debate on the current lawful use of the land, given this history. The actual uses do not correspond to any of those listed as sui generis on the Planning Portal.</p> <p>Section 336 of the TCPA 1990 defines 'agriculture' as including '<i>horticulture, fruit growing, seed growing</i>'. These uses correspond to activities carried out by Clifton Nurseries at the Nursery Lane land (albeit less now than in the past). The lessee of the site in 1953 was told by the LCC that his proposed use was agricultural, and in 1960 the lessee was informed by the then Kensington Council that his proposed uses were agricultural and hence were permitted development as such.</p> <p>Clifton Nurseries made a series of applications to RBKC in the 1980s to renew permission for a 'single storey building used as store, messroom and WC'. This implies staff routinely on site, and not vehicle travelling to and from '<i>a commercial</i></p>	
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	<p>dwelling' and thus the wording of the NPPF and the London Plan in relation to private residential gardens not constituting previously developed land does not apply. The site is not within recreational use or used as allotments, and given the current use of the site it is not previously-developed land where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time. Whilst historical horticultural use has occurred on the site as this was the permitted use from the planning permission in the 1960's it has not formed the principal use for many years. On this basis it is considered that the current use has strong characteristics of previously developed land.</p> <p>As noted in the Core Principles (paragraph 17) and within paragraph 111 of the NPPF, planning decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. The land has been identified as not being of high environmental quality and has the characteristics of previously developed land and thus making effective use of the land for future development meets prime objectives of the NPPF.</p> <p>As discussed above whether the site is considered to be Previously Developed Land, this is not a criterion for assessing whether land should be designated as Local Green Space. As outlined above the site is not Open Space nor has it ecological value and it can be developed for residential use.</p> <p>On this basis it is the view of Metropolis Property Ltd (and the Council's) that the land to the west of Highlever Road cannot meet all three tests and the designation of the site as Local Green Space would not be in accordance with the tests for potential designation set out in the NPPF.</p> <p><b>Local Green Space - Draft Policy StQW 4(b)</b>  <i>4b) To maintain amenity and biodiversity by requiring that mature trees on private open spaces and within gardens within that part of the Oxford Gardens Conservation Area falling</i></p>	<p><i>depot'.</i></p> <p>It is not argued in the StQW Plan the site is 'private garden land'. The land was used as allotments during and after the war (i.e. a use <i>excluded</i> from the PDL definition).</p> <p>The StQW Forum has yet to see evidence of when and how horticultural use ceased to be <i>'the principal use?'</i> and maintains that this use has continued to the present as the only use to have received planning permission.</p> <p>The Forum considers that the site is not Previously Developed Land, on the basis of close examination of its planning history. In reaching this conclusion the Forum has taken account on decisions in previous planning appeals involving similar circumstances of garden nurseries with redundant or semi-redundant glasshouses and/agricultural or horticultural buildings. Details will be cited at Examination of the Draft StQW Plan as necessary.</p> <p>As above, the StQW Forum disagrees with this analysis. RBKC commented on the prospects for LGS designation of Nursery Lane in informal comments on earlier drafts of the StQW Plan. As above, its formal comments on the revised Consultation Version take no view on this issue beyond stating that it is for the Forum to make the case.</p> <p>This proposed policy relates to all open spaces and gardens within the StQW Neighbourhood. It is correct that NPPF and RBKC policies give protection to trees within Conservation Areas. Not everyone is aware of these protections. The role of a neighbourhood plan is to include proposals and policies on issues which are felt strongly by local people (as this issue is) and to</p>	
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	<p><i>within the StQW neighbourhood remain protected.</i></p> <p>Response: It is considered that this policy is entirely unnecessary. Conservation Area policy, whilst complex, is clearly set out in the NPPF and the Core Strategy. In addition, Tree Preservation Orders also provide specific protection for specific trees. Where a tree in a Conservation Area is worthy of protection, it is protected. Effectively, a protected tree is a protected tree. There is no need for a Neighbourhood Plan to require something that is already protected to “remain protected.” This is simply unnecessary repetition.</p> <p>Also, as highlighted in the response on StQW 4(a) the land at Nursery Lane is not Private Open Space and this policy does not relate to the site.</p>	<p>raise awareness of where planning policies are in place (which this policy does).</p> <p>It will be the Examiner of the Plan to decide whether this represents 'unnecessary duplication'.</p> <p>As above the RBKC consultation response to the StQW Draft Plan state that the Council will be applying its Policy CR5 in relation to private open space in relation to the land at Nursery Lane, so presumably deems it such.</p>	
<p><b>CgMs Consulting, on behalf of the Legard family</b></p> <p><b>(These representations on behalf of the owners of the land at Nursery Lane run to 8 pages. For reasons of space in this consultation statement, factual material in the representations which sets out the statutory framework for neighbourhood planning and for the designation of Local Green Space has not been included. A copy of the full 8 page letter will be provided to the Examiner of the StQW Draft Plan</b></p>	<p>The purpose of these representations are to comment of the draft Plan with regard to meeting the ‘Basic Conditions’ required to make a Neighbourhood Plan.</p> <p>Representations are not made to all elements of the draft Plan, with these being made only with regard to the existing and potential future use / designation of the Clifton Nurseries site, and broad comments on other sections with regard to accordance with the Basic Conditions.</p> <p><b>Designations of the Clifton Nurseries Site</b></p> <p>The Development Plan for the Royal Borough of Kensington and Chelsea comprises the London Plan 2011, saved policies in the RBKC Unitary Development Plan (UDP) and the Core Strategy 2010. The Norland Neighbourhood Plan was made on the 10th March 2014, however is not relevant to the StQW Neighbourhood Forum area.</p> <p>The RBKC Proposals Map identifies the site as within a Conservation Area, with no other designations. At page 441 of the Core Strategy, the site is identified as ‘<i>Garden Squares and other Green Spaces</i>’, however not as an area of bio-diversity importance. It is not included in the London Conservation Services’ Borough Ecological Survey of 2002.</p> <p><b>Open Space Designation</b></p> <p>The Council undertook an Open Space Audit in 2004 which assessed the provision of Open</p>	<p>Agreed, and this same identification of the site appears at Page 54 of the Partial Review Miscellaneous matters, adopted by the Council in December 2014 so remains current.</p> <p>The inclusion of the site as a 'Garden square or other green space' at page 441 of the Core Strategy is clear evidence that the Council</p>	

	<p>Space within the Borough, both public and private. The Audit formed part of the evidence base for the preparation of the Council's Core Strategy. Paragraph 2.19 includes: <i>'Private residential gardens do not fall within the remit of the audit as explained later, but other areas of private open space have been included.'</i></p> <p>and paragraph 4.6 includes: <i>'Private Open Space is defined as "space to which public access is restricted or not formally established but which contributes to local amenity or wildlife habitat or meets the needs or is capable of meeting recreational or non-recreational needs, including school and private playing fields"'</i>.</p> <p>The location of Open Spaces within the Borough is shown on Map 1 of the Audit, with the Clifton Nurseries site not identified. On this basis the site is not deemed by the Council to be Open Space and, in line with para 4.6 of the audit, is not land that contributes to local amenity or wildlife habit (it does not contribute to recreational or non-recreational needs, as explained later in these representations). On this basis, the application of Core Strategy Policy CR5 with regard to the Clifton Nurseries site does not conform with the development plan as the site is not open space. Accordingly it should not be referred to as such within the draft Plan.</p> <p><b>Neighbourhood Plan Draft Policy StQW 4</b></p> <p>Point 4a) of Draft Policy StQW4 seeks to <i>'protect from inappropriate development the remaining 'backland' private open spaces in the neighbourhood'</i>. The first bullet point of the draft Policy refers to the Clifton Nurseries site. The Reasoned Justification for the draft Policy is included in Annexe C which is discussed further below.</p> <p>In simplest terms, the wording of the policy does not meet the Basic Conditions. It refers to open space, which the Clifton Nurseries site has been demonstrated above not to be, in terms of the adopted development plan.</p> <p>Point 4b) of the draft Policy is unnecessary. Trees deemed worthy of protection within the</p>	<p>considers the Nursery lane land to be 'open space'</p> <p>Paragraph 1.2 RBKC 2004 Audit states that <i>'The results of the audit will be used to inform the formulation of policy for open space as part of the Local Development Framework process.'</i> The Audit was not a policy making document, whereas the 1979/90 Oxford Gardens CAPS was (at that time).</p> <p>The 2004 RBKC Audit was one of many documents of supporting evidence to the Core Strategy. Given that the Audit listed 339 open spaces (of which Nursery Lane was not one) makes it unlikely that this specific issue was 'robustly examined' in the process of Cure Strategy adoption. The fact that the 2004 Audit did not include the Nursery Lane land does not lead to the conclusion that RBKC do not consider this site to be 'open space'. The Council has confirmed that it will be applying RBKC Pollyc CR5 to the land at Nursery lane..</p> <p>The policy statement in the Oxford Gardens CAPS is far more relevant to the Council's views on the land.</p> <p>The land at Nursery Lane has <b>not</b> been demonstrated to be 'not open space' and the Council has confirmed that it will be applying RBKC Policy CRF5s and when considering any planning application. The Council's response to the StQW consultation <i>states The Council is not suggesting that designation of the site as a Local Green Space is not in conformity with the Local Plan. However, it will be up to the Forum to demonstrate that it meets the criteria set out in the NPPF for designation of a Local Green Space.</i> There is no suggestion that Draft Policy StQW 4 <i>'does not meet the Basic Conditions'</i></p>	
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	<p>Oxford Gardens Conservation Area are already protected in planning policy terms. As long as the Conservation Area designation remains, so does the protection afforded to the trees.</p> <p><b>Designation of Land as Local Green Space (LGS)</b>  Annexe C of the draft Plan goes into considerable detail of why the Clifton Nurseries site should be allocated as LGS. A review is thus made on the background to the designation, the relevant ‘tests’ and the relevance of the information contained within the Annexe.  Guidance / Policy Background  The draft Plan seeks to allocate the Clifton Nurseries site as LGS. The draft Plan correctly identifies the Frameworks’ reference to designation of land as LGS within paragraphs 76 and 77.  <i>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.</i>  <i>77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</i>  <ul style="list-style-type: none"> <li>☐ <i>where the green space is in reasonably close proximity to the community it serves;</i></li> <li>☐ <i>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></li> <li>☐ <i>where the green area concerned is local in character and is not an extensive tract of land.</i></li> </ul> </p>	<p>This proposed StQW policy 4(b) relates to all open spaces and gardens within the StQW Neighbourhood.  It is correct that NPPF and RBKC policies give protection to trees within Conservation Areas. Not everyone is aware of these protections. The role of a neighbourhood plan is to include proposals and policies on issues which are felt strongly by local people (as this issue is ) and to raise awareness of where planning policies are in place (which this policy does).  It will be the Examiner of the Plan to decide whether this represents 'unnecessary duplication'.</p>	
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	<p>It is clear from the wording of paragraph 77 that the designation needs to comply with all of the bullet points as an 'and' criteria, not an 'or' criteria. In addition, the Framework states that a Local Green Space designation will not be appropriate for most green areas or open space. The NPPG notes:  <i>'Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.'</i>  and  <i>'Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.'</i>  and  <i>'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making'.</i></p> <p>In summary, any land proposed to be designated as LGS will need to be demonstrably special to the local community and would not prejudice the preparation of plan making for an area. The Framework notes that a LGS designation will not be appropriate for most green areas or open space and thus it is clear that there is a high threshold for such an allocation and land being simply a green area or open space does not necessarily mean that a LGS designation is warranted.</p> <p>Consideration of whether the Nursery Lane Site meets the Framework Criteria  The following paragraphs provide commentary on the potential for the site to be allocated as LGS.</p> <p>The draft Plan notes at paragraph C.1.3 that the Forum believe that the Nursery Lane site meets the first and third criteria of para 77, however RBKC Officers have stated that it does not meet the second. Therefore, at the current time, a designation of the site as a LGS could not be made until it has been demonstrated that the land meets the Framework para 77 criteria in its entirety.</p>	<p>These points are understood and accepted by the StQW Forum.</p> <p>The responses to the consultation on the StQW Draft Plan, and other material in the Submission Version of the Plan and the accompanying consultation annexe will (the StQW Forum considers) satisfy an Examiner that the land at Nursery Lane is <i>'demonstrably special to the local community'</i>. The land is not previously developed, has been protected from development, and the continuation of this status does not 'prejudice plan-making'</p> <p>The view expressed by RBKC officers in initial informal responses to the StQW Draft Plan has been overtaken by the formal comments to the Consultation Version of the Plan. In these comments the Council takes no view on whether the Nursery Lane site meets the second criteria for LGS designation and states that this will be an issue for the Examiner of the Draft plan to decide. The StQW Forum considers that the policy statement in the 1990 Oxford Gardens CAPS document is clear evidence of a RBKC view that all three remaining backland sites on the St Quintin Estate are of amenity and conservation</p>	
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	<p>Of note is that the Council refused a nomination to designate the site as an Asset of Community Value (ACV) on the grounds that <i>'the Clifton Nurseries site is not currently, nor in the recent past has it been, in a use that furthers the social wellbeing or social interests of the local community'</i>. It provides no recreational benefits to the local community, one of the requirements of an ACV designation, as it is private land with no access to the general public.</p> <p>To allocate as a LGS a site or land has to be <i>demonstrably 'special to a local community and (my emphasis) holds a particular local significance'</i>. Therefore, if the land is not demonstrably special to a local community then it fails the criteria. The Clifton Nurseries site has no public access and is run as a private enterprise. It is afforded limited views from outside the site itself, being viewed only by residents of the properties in the immediate neighbouring streets, a minimal proportion of the 1700 houses the Forum states as within the draft Plan area. It thus can not be considered special to those in the wider area. On this basis, it can not be deemed demonstrably special to a local community to meet the conditions of paragraph 77 of the Framework.</p> <p>In addition, it is noted that upon the publication of the StQW Neighbourhood Area &amp; Forum Application (and associated consultation responses), the Clifton Nurseries site was not referenced as being either special or having local significance, nor did any of the consultation responses note it as such.</p>	<p>value and should not be developed for housing. Evidence given by the Borough Planning Officer to the 1982 planning inquiry confirms this view.</p> <p>As pointed out above, on the same argument made by Rolfe Judd Planning, the statutory criteria for designation as an Asset Of Community Vale are very different to those for Local Green Space. ACV designation requires evidence that <i>The current use (or use in the recent past) of the building or land furthers the social wellbeing or interests of the local community as its primary purpose</i>. What constitutes 'recent' is a matter of interpretation. 'Primary purpose' is fairly clear. The StQW Forum accepts the RBKC decision on the ACV designation, but this has limited relevance to satisfying the very different criteria for LGS designation (including <i>beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife</i>). Hence the ACV decision by RBKC does not mean that the Nursery Lane land cannot be considered special to the local community.</p> <p>At the time of the application for designation of the StQW neighbourhood and forum (April 2012) it was understood by the qualifying body (the St Helens Residents Association) and by local residents generally that the policy in the Oxford Gardens CAPS gave full protection from housing development of the 3 named backland sites on the St Quintin Estate. Only in recent months has it become clear to local people that the CAPS policy statement now carries limited (or as RBKC now state) 'very limited' material weight. There is no indication to this effect on the RBKC website, where the CAPS statement is published.</p> <p>The proposed development which was the</p>	
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	<p>The following paragraphs provide commentary on the specific headings (or sub-sections) in Annexe C of the draft Plan.</p> <p>i. <i>Conservation Value of the Site</i> - Paragraph C.3.1 refers to a 1982 appeal for a development proposal at site, referencing comments made by a Planning Inspector. Of note though is that the references relate to ‘the proposal’ or ‘the proposed development’ i.e. the development proposed in the appeal that was considered by the Inspector. The references thus do not demonstrate that any form of development is unacceptable in terms of impact on the surrounding Conservation Area, providing justification in the draft Plan that the site should be kept open i.e. thus meeting the criteria of paragraph 77 of the Framework with regard to historic significance. The references to the planning history of the site are irrelevant.</p> <p>It is stated in paragraph C.3.2 that the Oxford Gardens Conservation Area Statement (1975, updated 1990) has a policy commitment that backland sites would not be used for housing, however the Statement does not form part of the Development Plan for the area and can thus not place restrictions on the location of development or define land uses.</p>	<p>subject of the comments and decisions by a Planning Inspector in 1982 was for a housing development of 21 houses. The proposed development exhibited by London Realty/Rolfe Judd in December 2014 is for 23 houses. The Inspector's comments and decision are thus very relevant.</p> <p>Evidence given by RBKC at the 1982 Inquiry, opposing the proposed housing development, is a matter of record, as are views submitted by local residents and the findings of the Inspector. File notes of subsequent meetings between representatives of the Legard family and RBKC planning officers show that the Council continued to advise that the land was <b>not</b> a potential housing development site and that such use would be refused.</p> <p>It is notable that during the 33 years since the 1982 planning appeal, the present owners of the site have brought forward no further proposals for development. The marketing of the site in took place in early 2014. The StQW Forum had written to the site owners in December 2013, explaining that a neighbourhood plan was in preparation, and asking what intentions the owners had for the future of the land. No reply was received.</p> <p>It is (now) understood and accepted by the StQW Forum and by local residents that the 1979/90 CAPS does not form part of the Development Plan for the Borough and cannot be applied to impose restrictions on the location of development or defined land use. This change of status in the CAPS is the result of change to planning legislation and not of any decision by RBKC. Hence StQW Policy 4a is being introduced in the StQW Draft Plan as a means of enabling the Council to continue its stated policy intent, with renewed material weight.</p>	
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	<p>Paragraph C.3.3 refers to the amenity value of the site in terms of outlook and open space, however these do not form part of the criteria for a LGS designation.</p> <p>ii. <i>Biodiversity</i> - The draft Plan refers to the Bio-diversity map on page 441 of the Core Strategy noting the site as having an application of ‘<i>Garden Squares and other Green Spaces</i>’. The map however does not include such a designation as being identified as of importance with regard to bio-diversity, as demonstrated by the ‘bracketed’ annotation on the legend. It is not a location identified in Policy as of importance with regard to Bio-diversity as defined in the development plan.</p> <p>iii. <i>Flooding</i> – the potential for flooding of a site or it’s location in a critical drainage area does not form part of the LGS designation in the Framework and accordingly paras C.4.5 and C.4.6 add no justification.</p> <p>iv. <i>Wildlife</i> - Paragraph C.4.7 of the draft Plan refers to the Wormwood Scrubs Nature Reserve, however it is unclear of the relevance of this statement given the Reserve is some 150m to the west. Paragraph C.4.8 lists a number of species that have been ‘seen’ at the Nursery Lane site, which appears to include protected species, however the draft Plan does not include any evidence or justification to substantiate this. The draft Plan can thus not be progressed without the provision of an evidence base to support this statement.</p> <p>v. <i>Tranquillity</i> – The premises are in commercial use and are visited regularly by staff depositing or removing items, which incurs a number of movements by flat bed trucks and other vehicles. It is inconceivable to think that local residents are not aware of this. The existing layout of access routes allow vehicles to cover all corners of the site, as could be expected from the nursery use. The current use is not restricted in terms of limitations of operation and the tenants could rightly increase the intensification of use at any time, subject to their business needs. Larger vehicles could access the land or the number of employees permanently at site be increased. A legitimate, existing business operation on site could thus not be considered to operate on land that is demonstrably special in terms of it’s tranquillity.</p>	<p>Outlook and open space are relevant to 'beauty'. Criteria B in NPPF Paragraph 77 does not claim to be an exhaustive list of all features and qualities which may make an open space 'demonstrably special to the local community'.</p> <p>This of limited relevance. NPPF paragraph 77 does not require Local Green Spaces to have specific levels of designation for bio-diversity.</p> <p>It is accepted that Flood Risk is an important issue to be considered in relation to a planning application, but not in relation to LGS designation. This will be recognised in the Submission version of the StQW Draft Plan.</p> <p>The StQW Forum will seek further demonstrable evidence. The fact that the Nursery Lane land lies close to the Wormwood Scrubs Nature Reserve (designated 2002) adds credence to the evidence of wildlife species provided in the current Annex C to the StQW Draft Plan.</p> <p>Residents living around the site are well able to provide evidence of the number of vehicle movements to and from the site, and around the site, since its use by Clifton Nurseries from the mid 1960s to today. The 'legitimate existing business operation' is undertaken by a company engaged in horticulture, a use for which a limited number of planning permissions have been granted over 50 years. While intensification of horticultural use is conceivable, other business uses would require permission for change of use. As it is, Clifton Nurseries have advised the StQW Forum that the company intends to leave the site, after a further</p>	
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	<p>vi. <i>Trees</i> – the presence of trees is not one of the tests for a LGS designation and accordingly para C.4.9 is irrelevant. In addition, the paragraph states the ‘<i>Council’s Tree Strategy makes clear the importance to the Borough of mature trees in public parks, garden square, and private open spaces</i>’. The Clifton Nurseries site is not a park, a garden square nor, as detailed above, defined as an open space.</p> <p><b>Previously Developed Land</b>  The draft Plan considers whether the site is Previously Developed Land (PDL), however the fact of whether the site is PDL is not a land use designation, nor is a consideration of LGS designation. Accordingly paragraphs C.2.1 to C.2.6 of the draft Plan are not relevant</p>	<p>clear-up of materials and waste on the land.</p> <p>The 'presence of trees' is not a test or requirement for LGS designation but is clearly related to the 'beauty' of an area of land. The Nursery Lane land is not currently a park or garden square, but has the potential to be a communal green space with various possible levels of public access, under existing or new ownership.</p> <p>It is clear that this was the originally intended use of the land. The land has never been sold on the open market and was inherited by its current owners from the St Quintin family who laid out this part of London.</p> <p>The Land Registry title shows ownership to remain with the Legard family, as confirmed in the representations from CgMs Consulting. This is not a case where a landowner has invested in a piece of land, or (given the planning history) can claim a justifiable expectation of increased capital value from housing development. The situation is more analogous to Green Belt land. Under StQW Policy 4a the commercial value of the land would revert to what local people would view as its 'true' value with no loss to its owners.</p> <p>As commented above, the NPPF criteria for Local Green Space may not refer specifically to the NPPF definition of Previously Developed Land, but it would seem obvious that absence of coverage of land by existing buildings and development will very often form part of a LGS designation</p> <p>Legal advice to the StQW Forum is that the question of whether the Nursery Lane site is PDL has significant relevance to StQW Policy 4(a), and hence Annexe C of the Draft plan looks at this issue in detail. The Draft Plan does not suggested that PDL classification alone, satisfies the second paragraph of NPP Paragraph 77. It is a factor that</p>	
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	<p>There is a reference to agricultural land in the draft Plan. Having reviewed the planning application for the ‘<i>renewal of permission for retention of two steel storage containers (ref 85/1628)</i>’, the applicant certified that none of the land was an agricultural holding. The application was accepted and determined by the Council on this basis. As the use of the land has not changed it is concluded that the Council do not consider the site to be agricultural land.</p> <p><b>Impact on Existing Lawful Use</b>  The site is currently in use as a commercial enterprise, Clifton Nurseries, a use that has been running for a number of decades. The site is associated with Clifton Nurseries activities elsewhere and is a depository and contractors stores where there are regular deliveries to load or unload equipment and plants. The site includes small scale buildings associated with this use, as well as greenhouses and a purpose built track to allow vehicles to move around the site. This use is as a commercial depot and storage site and given the bespoke nature of the uses would be considered to have a sui generis use.</p> <p>A LGS designation provides protection from development akin to Green Belt / Metropolitan Open Land, accordingly such a designation could significantly hamper the future operation of the premises were Clifton Nurseries to seek to grow their operation and increase activity, or require new structures at site. The Framework seeks in it’s Core Planning Principles to promote business that the country needs, as well as the RBKC Core Strategy Policy CO2 noting a desire for the Borough to be enhanced by commercial uses which can</p>	<p>the Examiner will wish to consider.</p> <p>Having similarly reviewed this 2005 application, the section at the foot of page 2 inviting an applicant to certify that none of the land is an agricultural holding has been left unsigned (in the copy in the RBKC archived planning file). Hence this provides no conclusion of the kind suggested.</p> <p>Whether not the site has sui generis use is a matter that the Examiner of the SrQW Plan will need to consider. There is evidence from correspondence in the 1960s onwards, from the London County Council and RBKC, that the land was considered to be in agricultural use. As set out above in responses to representations from Roche Judd, the primary use for the majority of the period 1965-2015 would seem to be agricultural/horticultural. (Section 336 of the TCPA 1990 defines ‘agriculture’ as including ‘<i>horticulture, fruit growing, seed growing</i>’). The small scale buildings on the site appear to be limited to the wooden shed, for which a series of planning applications has been made to RBKC with the description ‘store, messroom and WC’ suggesting staff at work on the site. The 1985 application describes the then use as ‘<i>standing ground for shrubs</i>’ i.e. a plant nursery activity.</p> <p>It is appreciated that LGS designation provides a strong level of protection. This is the intention of StQW Policy 4a which builds on an (intended) level of protection in the RBKC Oxford Gardens CAPS document.</p> <p>There is no evidence that Clifton Nurseries are planning to expand their business on the site. The company has advised the StQW Forum that it will be leaving the site.</p>	
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	<p>significantly contribute to the well being of residents.  A designation of the premises as a Local Green Space could effectively thus 'sterilise' the site in terms of possible future development (however small) which could enhance the commercial activity currently undertaken. A designation would therefore be contrary to the Framework and RBKC's Strategic Planning Policies.</p> <p><b>Section 8 – Latimer Road &amp; Section 10 – Housing</b>  Section 8 – Latimer Road  Whilst it is technically possible for a Neighbourhood Plan to designate or de-designate areas, any proposals as such must meet the Basic Conditions of conformity with the strategic policies in the development plan. The draft Plan seeks to include the provision of housing and other uses on land within the designated Employment Zone on Latimer Road. As noted in the draft Plan, Officers consider such a proposal to conflict with the development plan and thus does not satisfy the Basic Conditions for making a Neighbourhood Plan. This appears to be the correct approach given Policy CF5 of the Core Strategy resists the loss of business floorspace (B Class uses) and the introduction of residential uses including student housing or any form of living accommodation in Employment Zones.  The draft Plan appears to seek to justify additional uses in the Latimer Road Employment Zone by referencing a selective extract from the 2013 Peter Brett Associates Employment Land Assessment Update '<i>questioning the continuing viability of the Latimer Road part of the Freston Road / Latimer Road Employment Zone</i>'. The 2013 Update seems to provide such a summary for small scale office accommodation in the area, not all B Class uses.</p> <p>The draft Plan however does not consider the 2009 Employment Land Review prepared by Roger Tym (the evidence base for the Core Strategy) which states at paragraph 3.27 '<i>the</i></p>	<p>A Local Green Space designation would not 'sterilise' the site. It could in future be used for playing fields, recreation, allotments or other uses compatible with LGS designation including a shared or communal garden (for which use a bid to purchase the land was submitted to agents Knight Frank). Such a designation would <b>not</b> be contrary to the NPPF if a decision is made that the land meets the LGS tests. It would be in line with RBKC Policy CR5, and with the StQW Plan when 'made' as part of the Local Plan.</p> <p>The StQW Draft Plan proposes de-designation of the Latimer Road section of the joint Freston Road/Latimer Road EZ.</p> <p>The 'correct' approach to policies for Latimer Road will depend on Examination of the StQW Draft Plan and whether it is found to be in general conformity with the Local Plan.</p> <p>The content of the PBA report provides the most thorough of the studies which RBKC has commissioned on enterprise. The quotes in Section 8 of the StQW Draft Plan come from the conclusions of the part of the document covering Freston Road/Latimer Road. The StQW Draft Plan provides detailed data on existing buildings and uses to justify its proposed policies.</p> <p>It is not clear why a 5 year old study would provide a better evidence base than one dating from 2013.</p> <p>The StQW Draft Plan makes the case for allowing</p>	
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	<p><i>limited supply of light industrial/warehouse properties (in Latimer/Freston Road) enjoys steady demand from occupiers</i>. Paragraph 4.71 of the 2013 Update states the retention of the existing industrial stock as 'perfectly sustainable'. On this basis the Council is justified in seeking to protect existing uses in the defined Employment Zone, in accordance with adopted planning policies. The draft Plan does not thus provide the correct assessment of the market for units in Freston / Latimer Road before concluding that they should be released for other uses.</p> <p>Whilst para 8.2.20 of the draft Plan notes a partial review of the business /enterprise chapter of the Core Strategy, the current adopted policy is the development plan until that time. A Neighbourhood Plan can not apply 'interim policy' pending the outcome of what could / could not happen regarding a review of a Development Plan. Such a suggestion fails the Basic Conditions.</p> <p><b>Summary</b> It is detailed above why the draft Plan in it's current form does not meet the Basic Conditions required to move forward. The terminology of referencing the Clifton Nurseries site within the Plan as 'open space' is incorrect as it is demonstrably not as such when considered against the national planning guidance and the Development Plan. The Clifton Nurseries Site should not be included in draft Policy StQW4 and subsequently Annexe 4 should be removed. Policy StQW8 points a) to d) i.e. those relating to land uses, is in direct conflict with the Development Plan and Policy StQW10 does not meet requirements to provide additional housing across the borough and to identify deliverable sites.</p>	<p>change of use to housing of B1 office space on the upper floors in Latimer Road. Detailed evidence is provided to justify this policy proposal and will be for an Examiner to test the proposal for general conformity,</p> <p>It is accepted that the 2010 RBKC Core Strategy is the currently adopted development plan. A neighbourhood plan can introduce and 'set' policies which vary from the Local Plan, within the limits of 'general conformity'. These prevail over Local Plan policies, when applied within the neighbourhood area. (NPPF Paras 183-185). There is no requirement for neighbourhood plans to await either the preparation of a Local Plan, or a Partial Review of an existing Local Plan.</p> <p>RBKC has confirmed that it will be applying Local plan Policy CR5 on Open Space, to any planning application on the Nursery lane site.</p> <p>There is no 'conflict' with the Development Plan. CR10 identifies deliverable housing sites. The most recent application for the Crowthorne Road was rejected on grounds of lack of affordable housing, loss of employment floorspace, and other reasons. It is clearly a developable site for housing and is allocated as such in the StQW Draft Plan</p> <p>It is for the Examiner of the StQW Draft Plan to decide whether the Basic Conditions are met. The land at Nursery lane is demonstrably 'open space' in commonsense terms, and RBKC has confirmed that Local Plan policies on open space will apply in the event of a planning application.</p>	
<p><b>Barry and Carol Dodd, Brewster Gardens</b></p>	<p>We offer our strongest possible support for the St QW Neighbourhood Plan supporting the proposed designation of the Nursery Lane site as a Local Green Space. We have lived in</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons</p>	<p>Section 4</p>

	<p>Brewster Gardens for 36 years where we brought up our children.</p> <p>A defining characteristic of living here has always been the Nursery Lane piece of land behind our garden, with its trees and other flora and its varied wildlife. This has offered an invaluable shared amenity for us and our neighbours within the context of a wider changing urban environment.</p> <p>RBKC protects the Edwardian exterior of our properties, recognising the architectural merit and historic significance of these exteriors, so it is inherently contradictory that this enclosed green space, such an important architectural feature of our street layout, can be allowed to be built on just so a few people can make a large amount of money : this will affect the quality of life for everyone in the surrounding streets.</p> <p>RBKC in 1982 , in response to building development proposals on the Nursery Lane site, considered there would be no contribution to the local community. Subsequently, in later years, after extended consideration, in response to further building development proposals, RBKC stated that that such development would result in 'unacceptable loss of outlook and open space' and would not help 'preserve or enhance' the 'character' of the area.</p> <p>We ask in what ways these policy forming ideas have changed; so that this unique 'green lung' open space amenity should be now deemed suitable to be lost to present and future generations.</p> <p>We, as residents, therefore, rely on the council as our elected representatives, to continue to protect our environment from speculative development.</p>	<p>set out in Annexe C to the Plan</p>	
<p><b>E. and J. Godin, Pangbourne Avenue</b></p>	<p>We are in full support of all the proposals in the StQW Plan.</p> <p>It is imperative that the Nursery Lane land is kept as a Green Space. It should never be considered for houses, let alone those being built "for investment" as we were told by developers.</p> <p>It is necessary to support the Latimer Road residents on both sides of the street. They need protection.</p> <p>Re. Conservation issues ..... the front elevations of the houses should not be altered; it makes for unity in appearance which adds to the attraction of this area even when the properties vary from street to street.</p> <p>We are also happy to support all the other issues in the Plan.</p>	<p>The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan</p>	<p>Section 4</p>

	Best wishes with the Plan,		
<b>Juha and Phi Anjala. Highlever Road</b>	<p>First of all many thanks to you and the STQW board for the phenomenal work you have done to develop such a comprehensive neighbourhood plan, which we firmly believe reflects a very broad and well supported consensus from the residents of our Ward. We would like you to know that we, as residents, are fully supportive of the plan, especially of the very sensible approach it takes to future residential development within our ward.</p> <p>One of the primary influences in our decision to purchase property and move into the St. Quintin ward two years ago was the fact that the neighbourhood has a strong residential feeling with well laid out green spaces, including several "hidden gems" such as the Bowling Club which we are now members of, and especially the site of the former Ashfield Tennis which our garden back into. In all honesty, it was the tranquility and open green aspect of our garden provided by this wonderful green oasis that made us fall in love with our house and formed the deciding factor in our house purchase.</p> <p>We have taken great comfort from the fact that RBKC has in its past planning decisions honoured the protections afforded to these backland sites by the CAPS, and rejected prior attempts at residential development on the Nursery Lane land. We therefore commend the Neighbourhood Plan's aim to protect these few remaining backland sites through designating them as Local Green Space. Allowing these sites to be gutted by predatory developers seeking to make a quick profit with no regard to the lasting damage they would cause to the neighbourhood would be a tragic turn of events for both the immediate neighbours, and the surrounding neighbourhood. Furthermore, this would set a horrible precedent for many other equally vulnerable sites whose non-resident owners have no regard for their heritage, or the areas that surround them.</p> <p>We also find your suggestion that future residential development in our ward be steered towards brownfield sites, such as the commercial properties around Latimer Road to be very well thought through. As neighbours, we are all very aware that this corner of our ward has a reasonably restless feeling in the hours of darkness. There is no doubt in our mind, that mixed residential and commercial development would significantly enhance the nature of this part of our neighbourhood while providing space for further residential development. Furthermore, such redevelopment which is characteristic of many vibrant parts of our borough could, if sensitively executed, be done without detrimental impact on the character of our ward.</p>	The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan	Section 4
<b>Sally Poynter 167 Highlever Road</b>	I would like to register my support for the St Quintin and Woodlands Neighbourhood Plan. I believe the land at Nursery Lane should be recognised as a local green space, I	The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons	Section 4

<b>W10</b>	am appalled at the idea of using it to create 21 4 story houses.	set out in Annexe C to the Plan	
<b>Peter and Sue Warren 147 Highlever Rd, W10</b>	This is to express our support for the above plan and our opposition to the proposal to build houses on the Nursery Lane backlands site. It would take away the peaceful open aspect that the space affords from local residents including those in the sheltered housing. There are better areas for building flats and houses (eg Latimer Rd west side) where there can be a more varied range of developments. The site is a part of the original layout for the St Quintin Estate and the decision to fill it in with houses would be a legacy that planners would be responsible for a purely financial exercise. It would alter the nature of a preservation area. We also the support that this area should be designated as Local Green Space to preserve the trees and wild life habitat and the quality of life for all who live around and use the area.	The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan	Section 4
<b>Lucy Goldman 48 Dalgarno Gdns W10 6AB</b>	I am writing to include myself to the list of people strongly objecting to the development of the green space at Nursery Lane. We who live here cherish this green oasis behind our homes, the trees, the wild life and the feeling of an open space in a city where new buildings continue to crowd in on us. I appreciate that new housing is needed but everywhere I look in the immediate area massive new building complexes are appearing. Portobello Sq, the jct of Barlby and Ladbroke Grove, Shalfleet, The luxury dwellings at The Argyll site (not selling well) to name a few. Really, do we need more?? Many of the more expensive ones are not even marketed in this country, thus breaking down the community that is so unique in this area. I agree that in the future this particular green space could be better used as an asset to the borough and I myself, and many others I've spoken to, would welcome an active role in achieving this. I implore you to help us hang on to one of our few remaining green spaces and give us a chance to turn it into something that could benefit the community even more than it already does.	The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan	Section 4
<b>Heather Farrar, Highlever Road W10</b>	I support the proposed designation of this land (Nursery Lane) as Local Green Space	The StQW Draft Plan proposes this backland site is designated as Local Green Space, for reasons set out in Annexe C to the Plan	Section 4
<b>5. TRANSPORT</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>		<b>SECTION OF PLAN</b>
<b>Charles Hopkins,</b>	A direct bus link to Kensington High Street would be of great value, as would its	Local campaigns to persuade TfL to change bus	Section 5

<b>StQW Neighbourhood resident</b>	continuation to the Chelsea and Westminster Hospital.  The 7 bus now terminates at Oxford Circus, and to get the British Museum a change to route 98 has to be made. This is not reflected in the May 2014 Bus guide.	routes have not been successful. Action 5v in the Draft Plan proposes continued lobbying for improved bus services to Notting Hill Gate and Kensington High Street	
<b>Barbara Godin, local resident</b>	No to the return of speed bumps in St Quintin Avenue	This was a majority view at an open meeting of the Forum where this issue was discussed, but the need for speed warning signs was supported. To be pursued via the RBKC Streetscape Advisory Panel.	Section 5
<b>Henrietta Esiri, 56 Dalgarno Gardens</b>	Transport links do need improving and a nearer station at Western Circus would be excellent. My daughter could use it to get to and from school in Hampstead, instead of being driven part of the way.	An Action in the Draft Plan	Section 5
<b>Sheila O'Shea. StQW Neighbourhood resident</b>	Re: Traffic lights at North Pole Road and Wood Lane Junction  The long delays at the traffic lights deters drivers taking short cuts through the area and rat runners. Therefore on balance it is better for the area as a whole to have the delays for some drivers some of the the time rather than have a constant increase in traffic the whole time.	The delays at this junction are a frequent source of concern. Draft Policy 5c seeks to avoid any worsening of the situation.	Section 5
<b>Rolfe Judd Planning (on behalf of Metropolis Ltd)</b>	<i>5d) Where significant development is proposed within the StQW neighbourhood, to require that it be demonstrated that this will not result in increases in traffic congestion or on-street parking pressure, to an extent that would fail to preserve or enhance the character of the Oxford Gardens Conservation Area.</i> Response: Parking pressure and traffic movement is not a relevant test for a designated heritage asset and relates to residential amenity and traffic movement. Consequently, the Policy fails to have regard to the NPPF. In addition, the first part of the Policy should be changed in recognition of the explicit national policy requirement that “ <i>Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe</i> ” (NPPF Paragraph 32). Furthermore there is no measure or indication of what constitutes ‘significant development’.	This Draft Policy does not prevent development. It requires that development proposals take account of traffic and parking issues, as do a number of RBKC planning policies.	Section 5
<b>Karen Shirlaw, Total Utility</b>	I would like to propose a yellow box at the lights from North Pole road onto Wood Lane. This would stop traffic on scrubs lane queuing across the lights at north pole road which means that traffic can't exit and causes traffic jams every day on north pole road.	This proposal will be raised with LBHF. It would be an Action rather than a Policy in the final StQW Plan	Section 5
<b>The Hammersmith Society</b>	The Hammersmith Society has a legitimate interest in ‘an additional Overground station at 'Western Circus' (at the southern end of Latimer Road, beneath the Westway roundabout)	Noted	Section 5

<p><b>Amelia Slocombe, StQW Neighbourhood resident</b></p>	<p>I have read the draft plan. In the first instance I would like to say a huge thank you to whoever has taken the time to do this on behalf of all of us residents as it must have taken hours and hours of time and effort.</p> <p>I live at 42 Dalgarno Gardens and back directly onto the Clifton Nurseries site at a point at which (I suspect) we are likely to be very disturbed by any new development as we do not have any mature trees except Leylandii directly behind us. We would love it if the land could be designated as local green space, but frankly I fear it is unlikely this will be allowed to happen given that it has been completely bolted for years.</p> <p>My neighbour at 40 Dalgarno Gardens has lived there for over 70 years, however, and can remember a time when it was used for the whole community as tennis courts. It may be worth contacting them for evidence that it used to be used for the whole community.</p> <p>In any case, I have the following specific comments on the plan.</p> <p><b>Bus routes</b> I'm afraid I do not agree that bus routes are generally good. I think that we who live in the north of the neighbourhood are in the worst situation in terms of public transport as we are a 15 minute brisk walk from any tube station.</p> <p>The only useful bus we have is the 7. The 70 takes hours to get anywhere. My children (and several others on my street and close by) attend a school in High Street Kensington and others near me attend schools in Notting Hill Gate and we are all driving individually in our cars because we don't want to have to wait for two buses and pay £2.90 per journey to get us there. We desperately need a bus that goes to Notting Hill Gate and on to High Street Kensington taking the route of the 7 to Ladbroke Grove station and then the route of the 52 or the 452 down to High Street Kensington. I have emailed TFL on three occasions over the last couple of years and they repeatedly tell me there is no demand at the bus stop (the Highlever and Dalgarno bus stops). There is no demand BECAUSE there are no useful buses to wait for.</p> <p><b>Cycling</b> I agree that there is potential for more cycle routes in the area, but also we need the Barclays Bikes extended to Little Wormwood Scrubs and Eynham Road. We are in one of the worst served areas of central London for public transport and we don't have the Barclays bikes either beyond the Westway on St Marks Road.</p> <p><b>Proposed New Station</b> I am in favour of anything which would bring better transport including reviving the old St Quintin Overland station relocated to Imperial West. I do wonder, however, if there is any</p>	<p>Noted</p> <p>As above, local campaigns to persuade TfL to vary bus routes to provide a more direct link to Notting Hill Gate and Kensington High Street have not been successful. Action 5v in the Draft Plan proposes continues lobbying.</p> <p>An additional Boris Bike stand is the subject of Action 5v in the Draft Plan</p> <p>Action 5ii proposes continued lobbying for an</p>	<p>Section 4</p> <p>Section 5</p>
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	<p>potential for another Central Line station to be put in on the Du Cane Road side of Scrubs lane, just at the start of Du Cane road on the left. This would be far preferable in terms of accessing the rest of the tube network and similarly well located.</p> <p>Thank you for reading my comments. I hope they will be taken into consideration.</p>	<p>additional Overground station at Western Circus. The proposed pedestrian cycle underpass from Latimer Road to Wood Lane will significantly reduce walking distances from the southern part of the StQW Neighbourhood to the Central Line at White City.</p>	
<p><b>John Allen and Diana van de Kamp (42 Wallingford Avenue) and ARC Associates</b></p>	<p>These comments are directed at the following critical areas, much of which the draft covers but perhaps is overly conciliatory in its approach to a solution:</p> <ol style="list-style-type: none"> <li>1.The unrelenting and unpredictable knock on effects of future development adjacent to the area covered by the Neighbourhood Plan</li> <li>2. The traffic impacts as a highlighted area of the concentration of various uses in those adjacent areas</li> </ol> <p>The area suffers already from the mismanagement of traffic flows and the resultant static jams and resultant increased pollution from both the Westway tail backs on traffic exiting London and the knock on effects in the neighbourhood of the Wood Lane congestion.</p> <p>We have no direct control over the intensification of the land use in the areas to the south and west of us but we know one thing for sure, the local population within a 1 mile radius of our neighbourhood is rising inexorably and with that comes more road use demands and a large increase in traffic of all types.</p> <p>My main proposal is that the current cut through from Barlby Rd and St Quintin Ave via North Pole Road travelling west to Wood Lane is blocked completely and North Pole Rd becomes a dead end street travelling east to west while remaining open to local access from the west to east off Wood Lane.</p> <p>A camera monitored public transport route for buses/ambulances/taxis/bikes could use the current route headed west if policy so required but cars, vans and trucks would be banned from the route completely.</p> <p>This would force these intensifying car/van/truck traffic flows back down onto the main arterial routes to the east and west of the StQ area and do more in a single action to preserve the tranquility and peaceful enjoyment of the area than many far more complex ideas in our otherwise laudable draft plan which we will find are completely stymied by the effects of the surrounding increase in land use and population concentration, that in due course, will make the area we live in a blighted, congested and impassable series of rat runs onto North Pole Road to get to the severely pinched exit on Wood Lane.</p>	<p>TFL claim that traffic lights at the North Pole Road/Wood Lane junction are managed by a sophisticated SCOOT system which adjusts timings in response to traffic flows</p> <p>Agreed, and recognised in Section 5 of the Draft Plan</p> <p>It is not clear what 'cut through' is referred to. Limiting the North Pole Road/Wood Lane junction to traffic from the west to the east would remove the only access to North Kensington from LBHF between Shepherds Bush and the Harrow Road.</p> <p>Agreed that the current road network is becoming increasingly congested and that more radical solutions are needed given the planned scale of developments in White City East and at Old Oak.</p> <p>The LBHF Draft Local Plan 2015-30 begins to look</p>	<p>Section 5</p>

	<p>We cannot escape the relentless build up of traffic, regardless of the merits or otherwise of various suggested public transport initiatives, that the concentration of developments around us will bring with them, nor can we stop the rate of growth in use of cars. These are London wide phenomena which we are powerless to prevent, nor should we necessarily want to.</p> <p>I think the correct route to solving the congestion this would create outside our immediate area would be to take an east/west connection via the Kensal Gas works site or the associated railway wastelands to connect to Old Oak Common Lane at the northern end of that road and onto the A4000 to access back onto Western Ave near the current Talk Talk Headquarters.</p> <p>This solution would support the useful development of the derelict land to the north of us, and would make more efficient use of the northern part of Ladbrooke Grove and connect Harrow Rd efficiently to a western "escape" route out of London which would have a tremendously positive effect on the large increase in traffic that is inevitably coming our way otherwise.</p> <p>We lie in the absolute epicentre of a series of pressures around us that will squeeze the life out of our neighbourhood unless we can step out of the maelstrom completely.</p> <p>If this modest local solution was combined with a sensible response to the relentless tail backs at the southern end of Old Oak Common Lane and the Westway/Western Ave lights (that persistently causes congestion beyond the end of the Wood Lane access to the Westway and causes pollution from standing traffic for up to 6 hours a day that in turn blows, with the prevailing wind, over our neighbourhood), the temptation for drivers to want to avoid the Westway and use our roads as a shortcut to the A40 will be solved in a single stroke with no material inconvenience to those of us that live here.</p> <p>Locals and the current users accessing the Westway will then need to travel south or east to access the on ramps rather than going via Wood Lane. The St Anns Villas/Royal rescent/ Holland Park Ave problem would then require a solution in due course.</p> <p>There is much else in the work that has been done in the Draft that I strongly support and I commend your efforts and persistence but time is short for a response to be in today.</p> <p>Thank you from your grateful neighbours.</p>	<p>at these issues, including the possibility of re-routing the A40.</p>	
<p><b>Angela McConville Westway Trust</b></p>	<p>Thank you for the opportunity to comment on the St Quintin and Woodlands Draft</p>	<p>The land under Westway, as managed by the Trust (since the late 1960s), is leased from</p>	

	<p>Neighbourhood Plan.</p> <p>The Draft Plan is an impressive document and reflects the care, attention and concern that the participants in the Neighbourhood Forum have applied in its preparation. There is much in the Draft Plan, particularly relating to the visual appeal of the existing housing stock, that the Trust feels is best left to local residents to comment upon. We do, however, have a number of comments to make on the Draft Plan as it affects the Westway Trust's own estate and our ability to maintain and improve the estate for the benefit of the local community:</p> <p>It is wholly inappropriate for the Neighbourhood Plan to prescribe such a speculative and limited use on Westway Trusts land at 301 Latimer Road (save for the provision of a foot tunnel to link to Imperial West) until the issue of a new transport intersection at Latimer Road is decided. Whilst we support in general the improvement to infrastructure links within the area, a potential station on the land is merely speculative and it would be contrary to the community benefit to fetter the Trust's development possibilities by a proposal that may never be realised and, on the basis of an already identified alternative location, is more likely to happen off our estate than on our estate. Similarly, while the Westway Trust is a supporter of the foot tunnel from Imperial West, it is not within the Trust's gift to deliver the tunnel, and therefore the land should not be sterilised in perpetuity in the event that the tunnel is never delivered. On that basis Policy 5b should be deleted from the neighbourhood plan.</p>	<p>Transport for London to RBKC, and sub-leased to the Westway Trust. It is public and not private land, which the Trust manages on behalf of the community. Where a potential transport use is identified, of benefit to many RBKC residents, it seems reasonable that this land should be allocated for a public use. The site at 301 Latimer Road has remained in use as a car park for removed vehicles, with temporary planning permissions renewed at intervals, since the Westway was built. This use, and the state of the site, contributes to the rundown feel of the southern end of Latimer Road.</p> <p>The Trust chose not to implement a 2006 planning permission for an office building on the site because of lack of demand for office space at this location.</p> <p>The proposed pedestrian/cycle underpass due to be built on this site is enshrined in a S106 Agreement between LBHF and Imperial College and has reached planning application stage. It is required to be built before the completion of the next stage of Imperial West. Given the history of this site, the allocation of the remainder of it for future transport use is considered reasonable. The RBKC comment on this site allocation is '<i>The Council recognises this would support the function and character of the employment zone</i>'.</p> <p>The Submission Version of the StQW Draft Plan recognises that of neither of the transport infrastructure proposals in Section 5 of the Plan come forward within the next few years. mixed use development of the site would be appropriate.</p>	
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	<p>Additionally, we believe that Policies 3a and 3b should be deleted from the neighbourhood plan, on the grounds that the items are overly prescriptive and that existing planning controls provide sufficient safeguards in relation to the conservation area.</p> <p>Under 8 of the draft plan, while the Westway Trust is supportive of the attempts to stimulate the regeneration of the Latimer Road area, and also of the relaxation of policies with regards the allowance of residential development above ground floor commercial uses, the Neighbourhood Plan should not seek to be so prescriptive on heights to the western side, rather, that existing planning controls should be allowed to determine applications on a case by case basis according to specific context.</p> <p>A number of Action Points for the Neighbourhood Forum listed in the Draft Plan should be removed or amended as they do not relate to planning policy and those that remain should be established as a separate Forum Action Plan. For example, the Draft Plan proposes that the Forum should continue to lobby the Trust on aspects of the outdoor media sites within the curtilage of the Westway Sports Centre. That does not relate to planning policy on land within the proposed Neighbourhood Planning area. Furthermore, the reference to the Trust having “reliance” on the income from outdoor media sites is incorrect in fact. The Plan should more properly state that planning policy should balance the public benefit that the Trust can deliver through income from outdoor media sites with the environmental considerations of local residents.</p> <p>It is worth reiterating that Westway Trust believes it is at best unhelpful, and more likely counter-productive, to include any of the Trust’s estate in the area covered by the Draft Plan. The greater majority of the area covered by the Draft Plan comprises the local Conservation Area and most of the detail of the Plan addresses the specific concerns arising from the residential stock therein. A Supplementary Planning Document that covers the Trust’s estate has already been adopted in 2012 and it is sensible that the SPD together with the Core Strategy, be the persuasive policy for those areas.</p>	<p>The StQW Forum does not consider these proposed policies to be 'overly prescriptive' and no further justification is offered by the Westway Trust for their removal from the StQW Draft Plan. The Trust manages no land within the Oxford Gardens CA, but gains income from a 30m outdoor advertising tower some 90m from the boundary of the CA, a longstanding planning issue locally. The proposed deletion of policies 3a and 3b may relate to this structure, and is resisted by the StQW Forum.</p> <p>Policies on outdoor advertising structures are clearly a planning matter and are addressed in the RBKC Core Strategy and the RBKC SPD for the Westway area. The advertising structure at the Sports Centre has cast a severe blight on the neighbourhood since 2008 and is a proper issue to be addressed in the NP.</p> <p>The term 'reliance' has been amended. The Trust has refused over many years to reveal what income is derived from the advertising tower at the Westway Sports Centre, but maintains that this income stream is critical to maintaining certain of its programmes. This is a degree of 'reliance'.</p> <p>This debate was held prior to final decisions by RBKC on designation of the southern boundary of the StQW neighbourhood area, The Council amended the originally proposed boundary, accepting arguments that the strip of land behind houses in Oxford Gardens should be included in the NP area, as designated in July 2013. The case for its inclusion was so as to ensure that StQW residents could influence the design and layout of the pedestrian/cycle route from the Latimer Road</p>	
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		underpass through the land managed by the Westway Trust (behind Oxford Gardens) The Trust gives no reasons as to why this decision should be seen as 'unhelpful' or 'counterproductive'.	
<b>6. SAFETY AND TRANQUILLITY</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
	<b>No further comments received on the Consultation Version of the Draft Plan. Previous comments on issues at Blakes Close had already been fed into the Draft Plan</b>		6
<b>7. SHOPPING</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>
<b>Andrea Williams 23 St Helen's Gardens, W10</b>	A great concern of mine is the crossing of St Helen's Gardens, which doesn't tie in exactly with the piazza experiment. At a minimum, the Borough ought to consider a zebra crossing at Kelfield Gardens and St Helen's Gardens. Children and families often cross the road here (crossing St Helen's Gardens on the south side of Kelfield Gardens) and I have witnessed some dangerous driving during busy times. Please could you advise on where this suggestion needs to go? Shall I go directly to RBKC with this request? I fully support the creation of a pedestrian piazza at St Helen's Gardens if it removes the speedy driving which occurs up St Helen's Gardens north of Oxford Gardens. kind regards,	The RBKC North Kensington Streetscape Advisory Group, on which the StQW Forum is represented, is reviewing zebra crossings in the area and also looking at the feasibility of temporary road closures and a shared street surface in St Helens Gardens	5 and 7
<b>8. LATIMER ROAD</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	<b>SECTION OF PLAN</b>

<p><b>Catherine Lillingston</b> <b>469 Latimer rd</b></p>	<p>I agree on your caution about the proposed development of Nursery Lane but disagree on Latimer Rd relocation for housing above industrial estate as a resident myself of Latimer Rd. Our pleasure in living in this street is the light we get from a big open sky. No high buildings even though there is a precedent situated at bottom of Oxford Gardens which isn't faced by houses as such.</p> <p>We are facing a large no storey building which helps having light from above, the whole street is wide and low.</p> <p>You seem as a St Helen's resident and St Quintin to care rightly so for your perimeter but implying displacement from your area to ours looks like dumping a problem on us. We feel it is not appropriate to involve us Latimer residents in advising the council or developers to turn towards our lovely street. Can you please organise a meeting where the residents of both areas meet and discuss before giving the authority the sacrificial lamb?</p> <p>Thank you for taking our point of view into account,</p>	<p>Respondent contacted to explain that the proposal for additional housing in Latimer Road has been discussed at several open meetings, and that 23% of respondents to the StQW Survey specifically mentioned Latimer Road as a suitable location for additional housing.</p> <p>Proposed policy in Consultation version of the Draft Plan had a maximum height guideline of 14m (equivalent to 2 additional storeys on existing light industrial units) for the western side of Latimer Road. This was revised following the StQW open meeting on Feb 5th to the Draft Policy 8e in this Submission Version of the Plan.</p>	<p>Section 8 and 4</p>
<p><b>Sabrina Rowan Hamilton</b> <b>258 Latimer Road</b></p>	<p>I thoroughly agree with (above comment). Part of the charm of Latimer Road is its slightly wild west end of the road charm...with business thriving opposite me no 258 is a rehearsal space. I have spoken to the owner and he is planning to develop a theatre space and a cafe with no need to build higher there are music studios and extremely useful mechanics who needs more high rises blocking the light and causing probably years of noise and unrest whilst buildings are erected I would imagine there might be cause for concern from the residents of Eynham road on the other side of the railway track whose light would also be blocked by high rise buildings. Please help us maintain our big open skied street it is one of the enormous pleasure of living here.</p>	<p>As above on the issue of building heights. StQW Forum supports use of Unit 8 as performance space and the Draft Plan seeks wider use classes to allow for cafes.</p> <p>StQW Plan draft policies 8a and 8b support a wider range of activities in Latimer Road..</p> <p>Building heights across the LBHF boundary are beyond the control of RBKC or the StQW Plan.</p>	<p>Section 8</p>
<p><b>Hugo Campbell</b> <b>Local resident in Latimer Road</b></p>	<p>As another Latimerinian, I concur with the feelings of both (comments above).</p> <p>Further high rise on the street will only darken us and take away its particular charm that we have lived with over these last 20 years. That said I think there does need to be some more added life and energy to parts of the street...having mezzanines built being one idea that said music studio owner has once talked about.</p> <p>I am more animated by the fact that many use Latimer Road as a test track to see how fast their machines can go ....why cannot there be speed humps or traffic calmer as in St Quintin Ave?</p>	<p>Proposed Policy 8e in Consultation version of the Draft Plan had a maximum height guideline of 14m (equivalent to 2 additional storeys on existing light industrial units) for the western side of Latimer Road. This was revised following the StQW open meeting on Feb 5th to the Draft Policy 8e in this Submission Version of the Plan.</p> <p>Speed humps have been removed from St Quintin Avenue by RBKC, and RBKC no longer favour these. Problems of speeding in Latimer Road have been raised at North Kensington Streetscape Advisory Group..</p>	

<p><b>Chris Green, Director Town Planning Services (on behalf of JVC Estates Ltd, owners of office building in Latimer Road</b></p>	<p>We write on behalf of JCV Estates Limited (who own premises on Latimer Road) to provide our comments in respect of the Consultation Draft ‘St Quintin and Woodlands Draft Neighbourhood Plan 2015 to 2030’ 2014.</p> <p>By way of background, we have previously made representations on behalf of our client to relevant planning policy documents concerning the future development of Latimer Road. These include submissions to the following:</p> <ul style="list-style-type: none"> <li>• RBKC ‘Proposed exemption to permitted development rights for offices’ February 2013</li> <li>• ‘St Quintin and Woodlands Neighbourhood Survey’ February 2014</li> <li>• RBKC ‘Enterprise Core Strategy Review: Issues and Options’ December 2014</li> </ul> <p>We would be pleased to provide copies of relevant responses if this would assist. In short however, our representations have consistently promoted a more flexible policy environment concerning the potential reuse of existing offices within Latimer Road. It is considered that the current restrictions imposed under RBKC’s adopted ‘Core Strategy’ 2010 (specifically Policy CF5), together with the Borough-wide exemption from the Government’s permitted development rights to allow changes of use from B1 ‘Office’ to C3 ‘Residential’ without the need for planning permission, are unnecessary.</p> <p>Furthermore, they constrain the vitality of Latimer Road, and are contrary to the thrust of the presumption in favour of sustainable development set out in the National Planning Policy Framework, including the Government’s promotion of a more flexible approach to the reuse of office buildings: the National Planning Policy Framework clearly states (Paragraph 51) that local authorities should “normally approve planning applications for change of use to residential ... from commercial buildings where there is an identified need for additional housing in that area, provided there are no strong economic reasons why such development would be inappropriate ...”.</p> <p>In this context, our submissions have supported not only the existence and principle of the proposed St Quintin and Woodlands Neighbourhood Plan, but also the more pragmatic approach advocated in respect of the reuse of existing offices and employment land along Latimer Road. We remain of this view and support the consultation draft of the Neighbourhood Plan and the policies contained within it concerning commercial uses on Latimer Road (i.e. Draft Policy StQW8).</p> <p>The draft Neighbourhood Plan presents a sound, reasoned justification for the proposed policy and we would concur with the comprehensive analysis set out at Section 8. We comment on the Neighbourhood Plan in further detail below. Our representations are confined to Draft Policy StQW8.</p>	<p>The StQW Forum shares this analysis of the problems of Latimer Road, and the view that the StQW proposed policies will bring benefit to the street and to the wider area.</p>	
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**Policy 8a) Separation of Freston Road and Latimer Road designations**

We would support the separate designation of Freston Road and Latimer Road. While these have historically been considered as a single employment allocation, it is apparent that the two areas are both physically separated, and entirely different in character. It is therefore wholly appropriate and necessary that this is recognised in planning policy terms.

The proposed separation of these areas within the Neighbourhood Plan would remain consistent with the broad designation in the Core Strategy, but would facilitate a more finely grained application of planning policies. In this regard, the Neighbourhood Plan would clearly remain in 'general conformity', while setting out a more refined policy approach to reflect the local circumstances, in accordance with the aims and objectives of neighbourhood plans.

**Policy 8b) Residential Uses on Upper Floors**

We concur with the very detailed assessment and justification set out in the Neighbourhood Plan insofar as Policy 8b is concerned. The Neighbourhood Plan explains not only the commercial constraints effecting properties along Latimer Road, but also the potential benefits arising from a more flexible approach to allow residential development on upper floors, and we support the proposed policy. The proposed policy approach set out in the Neighbourhood Plan would enhance the overall vitality and viability of the area. The analysis and reasoned justification wholly reflects our client's experience in Latimer Road, and we have commented on this matter in detail in our previous submissions.

Policy StQW8 and the proposed introduction of increased flexibility remain in 'general conformity' with the adopted RBKC 'Core Strategy' 2010. The Neighbourhood Plan clearly sets out the specific reasons that justify a more flexible approach in Latimer Road. In this respect, the proposed Neighbourhood Plan would not undermine the Core Strategy and the more rigid approach that may continue to be applied more appropriately elsewhere.

Furthermore, the proposed Neighbourhood Plan is entirely consistent with the advice in the National Planning Policy Framework and the presumption in favour of sustainable development.

**Policy 8c) Flexibility for Commercial Uses**

Although we believe that the reuse of offices for residential development offers the greatest benefit for the local area and is to be preferred, we would also support the proposed flexibility outlined in Policy 8c. This proposes that a range of commercial uses (including retail, food and drink etc) may be acceptable in the employment area, where they would contribute to the vitality and viability of the area.

The Neighbourhood Plan explains that the absence of services and facilities to meet the

	<p>needs of commercial uses considerably limits attraction of the area to potential occupiers. Latimer Road is considerably less accessible in this respect, when compared to other competing locations in the Borough. Accordingly, the proposed policy to introduce greater flexibility to enhance the range of services and facilities will contribute to the overall improvement of the area and the enhancement of its vitality and viability.</p> <p>I trust that the above comments are of assistance and will be taken in to account in the continued preparation of the Neighbourhood Plan. Please do not hesitate to contact me should you have any queries or require any further clarification.</p>		
<p><b>Tanya Sarne, 329 Latimer Rd, London W10</b></p>	<p>I am based at 329 Latimer Road and very much support the neighbourhood plan for the Latimer Rd area which would increase the mix of residential and commercial buildings.</p> <p>For reference I have attached a copy of my responses to the Enterprise Core Strategy Review Response Form. (response to RBKC available from the Council's website and says inter alia</p> <p>- I feel that Latimer Road is often unfairly tied in with Freston Road, when they are hardly very close to each other. It makes no sense and should be dropped. The Neighbourhood Plan I have been consulted on does show the best policies that should be used in Latimer Road.</p> <p>- Given the difficulty I have had in renting out two beautiful units in 329 Latimer Rd, there doesn't seem to be a huge demand for commercial premises in Latimer Road. I've had to accept an extremely low rent which doesn't even cover my expenses.</p>	<p>The StQW Forum shares these views and Draft Policy 8a proposes de-designation of the Latimer Road section of the joint Freston Road/Latimer Road Employment Zone.</p> <p>The StQW Forum's evidence of rent levels in Latimer Road which are unviable for long-term ownership and re-investment. Hence the policy proposals in this Draft Plan.</p>	8
<p><b>Charly Hutchings Thirteen Ltd</b></p>	<p>We're a business located on Latimer Road and I'm writing in support of the plans to integrate mixed use usage to buildings on Latimer to help with reviving the area.</p>		8
<p><b>Olivier MOUGIN C.W.F. Children Worldwide Fashion Olympic House, 317-321 Latimer Road, London, W10 6RA</b></p>	<p>The current policy has not worked for the Latimer Road area. This road needs more energy and the planning policy needs to be relaxed to allow for more varieties and to allow for a much needed revival of Latimer Road. Latimer Road also needs to be split from Freston Road</p>	<p>The StQW Draft plan proposes de-designation of the Latimer Road sections of the EZ and more flexible policies on mixed use.</p>	
<p><b>Henrietta Esiri 56 Dalgarno Gardens</b></p>	<p>I have never seen Latimer Rd reach its full potential and I think more development of housing, shops, businesses and cafes would be a welcome addition to this area.</p>		8
<p><b>Butchoff Antiques 154 Kensington Church</b></p>	<p>I write in reference to your letter dated 28th November regarding the future of Latimer Road.</p>		

<p><b>Street London, W8 4BN</b></p>	<p>I can confirm that we are the registered owner of Unit 5 Latimer Road, and that we do not have any objections to your current proposals and would be interested to be made aware of all future developments.</p> <p>I look forward to hearing from you again in due course.</p>		<p>8</p>
<p><b>Clobb Properties, Latimer Road</b></p>	<p>Clobb Properties is the owner of Olympic House, an office and commercial building at the southern end of Latimer Road,</p> <p>As the draft Neighbourhood Plan explains, Latimer Road has struggled over recent years as an office location. Many of the reasons for this were given in the Commercial Property Study of the Borough, commissioned by RBKC from Roger Tym and Partners, dated March 2013.</p> <p>On the Latimer/Freston Road Employment Zone, the report made the following points:  <i>“At its Southern end the area is attractive, close to the Tube station and Westfield shopping centre and well provided with amenities. But moving northwards, part of the zone sits under the intersection of the A40 Westway and A3220 West Cross Road, creating a physical barrier and a potentially intimidating environment. North of the Westway the environment deteriorates, business uses are more thinly spread and there is a general lack of amenities.”</i>          Para 4.47</p> <p><i>“Towards the north of the employment zone, office buildings are older and lower quality. The occupier profile is mixed, without the same emphasis on creative industries.”</i> Para 4.50</p> <p><i>“To the north of the area, the office accommodation is less popular. The area does offer low cost offices, but the general quality of the environment and the poor links through to the Tube station deter potential tenants, and these units are harder to let.”</i> Para 4.53</p> <p><i>“As we have seen, the offices to the north of the zone are not well occupied and command low rents. The root of the problem is the area’s poor environment and difficult access, and the lack of a critical mass of office property.”</i> Para 4.58</p> <p>In addition to the lack of transport and amenities referred to above, it should be noted that security is also a concern for commercial occupiers in the road - particularly those on the west side abutting the railway line.</p> <p>For all these reasons we support the proposal in the St Quentin and Woodlands draft Neighbourhood Plan to de-designate Latimer Road as an Employment Zone and allow a wider range of commercial uses to revitalize the street. More and better amenities would be a boost not just for businesses in the area, but also local residents.</p>	<p>The StQW Forum shares these views and Draft Policy 8a proposes de-designation of the Latimer Road section of the joint Freston Road/Latimer Road Employment Zone.</p> <p>The StQW Forum's evidence of rent levels in Latimer Road which are unviable for long-term ownership and re-investment. hence the policy proposals in this Draft Plan.</p>	<p>8</p> <p>8, 10 and 6</p>

	<p>We also support the proposal to allow an element of residential space above ground floor commercial uses. This would make better use of floorspace which at the moment is often underused. It would also improve security for businesses at night and weekends by providing more eyes and ears on the street.</p>	<p>Agreed.</p>	
<p><b>Rebecca Guinness</b>  <b>278 Latimer Road</b>  <b>London W10 6QW</b>  <b>07803 032949</b></p>	<p>My husband Heron White and I live at 278 Latimer Road.</p> <p>With regards to the neighbourhood plan that is currently being formulated by the St Quintin and Woodlands Neighbourhood Forum and specifically with regards to the proposal for redeveloping Latimer Road we would like to object to the proposed height for buildings on the western side of Latimer Road. The figure of 14m/46 feet (to meet the height of the Morelli building at 337 Latimer Road) has been mooted in the draft plan and this proposed height would substantially affect buildings on the eastern side of the road.</p> <p>As is evident in this photograph from 1900 (Figure 1), the historical landscape of the street is of low buildings: cottages similar to those still standing at the north end of Latimer Road. Although buildings (both office and other) of more substantial height exist at the southern end of Latimer Road, in all cases these face buildings that have historically been non-residential.</p> <p>As shown in Figure 2, the Morelli building is the tallest building on the west side of Latimer Road and its neighbour (341) that is currently under construction although planned to be higher than its demolished predecessor, will be substantially lower than Morelli (Figure 3).</p> <p>One of the valued assets of Latimer Road is the single pub on the street that enjoys unparalleled evening sunlight during the summer months and therefore a much increased clientele for that season. Any proposal to increase heights of buildings on the western side of the street would substantially affect these premises and totally change the character of the road.</p> <p>Furthermore the proposal to create mixed-use buildings down the entire length of the road will massively increase pressure on parking. The current units all have private parking areas which more than doubles the amount of cars that can be parked on the street. Due to the distance from the tube, cars are an essential method of transport on this road and this pressure on parking must be taken into account when considering the redevelopment of the street.</p> <p>This road represents one of the last remaining enclaves of industrial buildings in Kensington &amp; Chelsea, a space where essential services such as mechanics can operate. With the proposed changes these traders will likely be forced out of the borough. While we</p>	<p>Proposed Policy 8e in Consultation version of the Draft Plan had a maximum height guideline of 14m (equivalent to 2 additional storeys on existing light industrial units) for the western side of Latimer Road. This was revised following the StQW open meeting on Feb 5th to the Draft Policy 8e in this Submission Version of the Plan.</p>	<p>8</p>

	are in no way opposed to the reinvigoration of the street by relaxing the usage of the commercial buildings, we feel that the loss of these services in the area would be unfortunate.		
<b>Sabrina Rowan Hamilton 258 Latimer Road</b>	I would like to agree with Rebecca Guinness. I live in 258 Latimer Road and would (be) thoroughly opposed to much high rise building in the street.	Proposed Policy 8e in Consultation version of the Draft Plan had a maximum height guideline of 14m (equivalent to 2 additional storeys on existing light industrial units) for the western side of Latimer Road. This was revised following the StQW open meeting on Feb 5th to the Draft Policy 8e in this Submission Version of the Plan.	
<b>Lucy Roberts 481 Latimer Road</b>	<p>I live at 481 Latimer Road, and agree with the objections outlined by Rebecca (Guinness).</p> <p>Specifically I would like to object to the proposed height for buildings on the western side of Latimer Road. The figure of 14m/46 feet (to meet the height of the Morelli building at 337 Latimer Road) would substantially affect the sunlight afforded to both sides of the road. It would block the beautiful evening sunlight to the tables outside the pub which would totally change the character of the road.</p> <p>I also agree that the proposal to create mixed-use buildings down the entire length of the road will massively increase pressure on parking. Spaces are already in short supply and this would mean we would sometimes be forced to park on other roads a great distance from our homes. Furthermore, there are already often traffic jams on the road, with people angrily blowing the horns of their cars outside my home. It is important that there is no increase in traffic on an already over-congested road.</p>	<p>Proposed Policy 8e in Consultation version of the Draft Plan had a maximum height guideline of 14m (equivalent to 2 additional storeys on existing light industrial units) for the western side of Latimer Road. This was revised following the StQW open meeting on Feb 5th to the Draft Policy 8e in this Submission Version of the Plan.</p> <p>Mixed use with housing would not add to pressure on resident parking bays, as new housing in RBKC is required to be permit-free under current Council planning policies.</p>	
<b>CgMs Consulting (on behalf of the Legard family, owners of the land at Nursery Lane.</b>	<p>Section 8 – Latimer Road</p> <p>Whilst it is technically possible for a Neighbourhood Plan to designate or de-designate areas, any proposals as such must meet the Basic Conditions of conformity with the strategic policies in the development plan. The draft Plan seeks to include the provision of housing and other uses on land within the designated Employment Zone on Latimer Road. As noted in the draft Plan, Officers consider such a proposal to conflict with the development plan and thus does not satisfy the Basic Conditions for making a Neighbourhood Plan. This appears to be the correct approach given Policy</p>	<p>The StQW Draft Plan propose de-designation of the Latimer Road section of the joint Freston Road/Latimer Road EZ.</p> <p>The 'correct' approach to policies for Latimer Road will depend on Examination of the StQW Draft Plan and whether it is found to be in general conformity with the Local Plan.</p>	

	<p>CF5 of the Core Strategy resists the loss of business floorspace (B Class uses) and the introduction of residential uses including student housing or any form of living accommodation in Employment Zones.</p> <p>The draft Plan appears to seek to justify additional uses in the Latimer Road Employment Zone by referencing a selective extract from the 2013 Peter Brett Associates Employment Land Assessment Update '<i>questioning the continuing viability of the Latimer Road part of the Freston Road / Latimer Road Employment Zone</i>'. The 2013 Update seems to provide such a summary for small scale office accommodation in the area, not all B Class uses.</p> <p>The draft Plan however does not consider the 2009 Employment Land Review prepared by Roger Tym (the evidence base for the Core Strategy) which states at paragraph 3.27 '<i>the limited supply of light industrial/warehouse properties (in Latimer/Freston Road) enjoys steady demand from occupiers</i>'. Paragraph 4.71 of the 2013 Update states the retention of the existing industrial stock as '<i>perfectly sustainable</i>'. On this basis the Council is justified in seeking to protect existing uses in the defined Employment Zone, in accordance with adopted planning policies. The draft Plan does not thus provide the correct assessment of the market for units in Freston / Latimer Road before concluding that they should be released for other uses.</p> <p>Whilst para 8.2.20 of the draft Plan notes a partial review of the business / enterprise chapter of the Core Strategy, the current adopted policy is the development plan until that time. A Neighbourhood Plan can not apply '<i>interim policy</i>' pending the outcome of what could / could not happen regarding a review of a Development Plan. Such a suggestion fails the Basic Conditions.</p>	<p>The content of the PBA provides the most thorough of the studies which RBKC has commissioned on enterprise. The quotes in Section 8 of the StQW Draft Plan come from the conclusions of the part of the document covering Freston Rpoad/Latimer Road. The StQW Draft Plan provides detailed data on existing buildings and uses to justify its proposed policies.</p> <p>It is not clear why a 5 year old study would provide a better evidence base than one dating from 2013.</p> <p>The StQW Draft Plan makes the case for allowing change of use to housing of B1 office space on the upper floors in Latimer Road. Detailed evidence is provided to justify this policy proposal and will be for an Examiner to test the proposal for general conformity,</p> <p>A neighbourhood plan can introduce and 'set' policies which vary from the Local Plan, within the limits of 'general conformity'. These prevail over Local Plan policies, when applied within the neighbourhood area. (NPPF Paras 183-185). There is no requirement for neighbourhood plans to await either the preparation of a Local Plan, or a Partial Review of an existing Local Plan.</p>	
<p><b>Georgina Pomper, 276 Latimer Toad, W10</b></p>	<p>I recently purchased 276 Latimer Road for my family. I have 2 young sons aged 6 and 7. I specifically chose my house, because of the unobstructed skyline, width of road, availability of parking spaces for residents as well as parking for the business units and visitors to the street. I did not want a purely residential street, and there is a lovely buzz of commerce during the day in the current units trading.</p>	<p>Respondent contacted to say that there will be a further public meeting at the end of the consultation period, at which all local residents will have the chance to have their say.</p>	

	<p>The pub next to my house enjoys a wonderful sunset where the residents of the road can gather and relax in the evenings. The mix of purely residential versus commercial premises is perfect as it stands.</p> <p>Furthermore on research of the street, this has always historically been the case. So many London Streets have been destroyed by over development, and I welcomed a street that respected its history.</p> <p>I am very strongly opposed to the proposed redevelopment for a number of reasons. Firstly the parking situation is at capacity at present. There simply is not the space on street to serve further residential as well as pay and display parking.</p> <p>In addition, the tube stations are not located nearby, and residents need these essential parking spaces close to their homes.</p> <p>For clarity I am also strongly opposed to further residential units being built above the proposed changes to the units 1-14. There simply is no need for this. It will have a direct adverse affect on the values of the homes on the street, which have increased in value greatly over the recent years. I notice the residents taking care of their front gardens and properties, as they appreciate that they have a worthy asset in their homes.</p> <p>Latimer Road is a unique street and should be respected as such.</p> <p>The proposed heights for the buildings will completely destroy the symmetry of the road, overburden the street with further residents and destroy the history of the road. It will also cause tremendous congestion, due to Latimer road already being used as a thoroughfare to access other areas of London. Furthermore there are a number of cul de sacs off Latimer Road which can only be accessed via Latimer Road, so that traffic needs to be factored in as well.</p> <p>There is already an enormous housing project being erected behind Latimer road behind the Westway, which will provide more than enough residential spaces to suffice demand for residences.</p> <p>To date all the owners/lessees' of the commercial units are opposed to any redevelopment of their units as outlined in your proposals.</p> <p>There are families with young children living along the road. The increase in traffic, which would be inevitable as per the redevelopment plans, is hazardous for their safety.</p> <p>In conclusion, Latimer Road is perfect as it stands. The community spirit amongst residents and current commercial units works perfectly. The current <i>number</i> of residents and commercial residents works perfectly, and complements the entire St Quintin estate.</p> <p>Overburdening Latimer Road will destroy its historic essence, functionality, spirit and</p>	<p>Also to explain that while the StQW Draft Plan proposes some changes to current RB Kensington &amp; Chelsea planning policies for Latimer Road, there is no 'development' as such currently proposed for the western side of the street. The Draft Plan does propose that as and when building owners wish to redevelop, increased building heights should be allowed. A maximum guideline height figure of 14m was proposed in the Consultation Version of the StQW Plan, but revised Draft Policy 8e included in the Submission Version.</p> <p>The Draft Plan also proposes that residential use should be allowed in the upper floors of buildings in those parts of the street currently 'zoned' by the Council for B1 office/warehouse use only (and in any of the Units 1-14 which are redeveloped). This current restrictive Council policy has led to long-term vacant office space at the southern end of Latimer Road, leaving it relatively deserted, unsafe at night and with buildings that cannot economically be maintained. These RBKC policies have also prevented cafes, restaurants, creches, nurseries, gyms or other activities opening up in the street, as these are not classed as B1 uses.</p> <p>The StQW Forum is trying to bring activity and vitality back to Latimer Road, while respecting the fact that it has always been a 'mixed use' street which combines housing with commercial and business activity. There are no proposals to make it a purely residential street and all discussions at public meetings of the Forum have shown that the existing commercial activity in the street is valued locally. It is the empty and underused buildings that are a concern, coupled with a lack of any new housing in this area at prices that most Londoners can begin to contemplate.</p> <p>RBKC has a policy that all new housing in the</p>	
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	aesthetics on all levels.	<p>Borough must be 'permit free', with off-street parking provided (if there is to be any parking at all). So redevelopment of any of Units 1-14 with flats above, or future residential use of vacant office space at the southern end of Latimer Road, would not lead to extra onstreet parking. It might lead to the units being redeveloped with basements that included parking.</p> <p>This consultation response states 'To date all the owners/lessees' of the commercial units are opposed to any redevelopment of their units as outlined in your proposals'. The STQW Forum wrote to all the owners of Units 1-14 to alert them to the proposals in the StQW Draft Plan, at the start of the 8 week public consultation. No negative responses were received and several have since contacted the Forum to express support.</p>	
<b>10. HOUSING</b>			
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>		<b>SECTION OF PLAN</b>
Rolfe Judd Planning, on behalf of Metropolis Property Ltd.	<p><b>Housing: Draft Policy StQW 10.</b></p> <p><i>10a) To allocate for housing use (with an element of mixed use as appropriate to the individual location) the following potential development sites within the StQW neighbourhood:</i></p> <p><i>3-4 Crowthorne Road</i></p> <p><i>142a Highlever Road</i></p> <p><i>10b) To provide additional housing in Latimer Road, through conversion/redevelopment of floors above ground and mezzanine level, as an addition to the existing B class floorspace at ground and mezzanine level.</i></p> <p>Paragraph 47 of the NPPF states that Councils should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Councils should also identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. Councils should also illustrate for market and affordable housing, the expected rate of housing delivery through a housing trajectory for</p>	<p>This NPPF paragraph is fully understood, as are the subsequent comments on the fact that the Borough fails to meet its housing targets.</p> <p>The Council does not publish details of specific developable housing sites, beyond large strategic sites covered in the Core Strategy. RBKC officers</p>	

	<p>the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and set out their own approach to housing density to reflect local circumstances.</p> <p>Current housing completions in RBKC are not meeting the London Plan targets and the Further Alterations to the London Plan (FALP) is proposing to raise the target for new homes within the borough from 6000 between 2011 and 2021 to 7330 between 2015 and 2025. This latest target may be achievable if major regeneration projects which are proposed to be delivered come forward however if these don't transpire then the Council will fall significantly short of meeting the current and future London Plan targets. Within these targets the Council also relies for a proportion of the provision to come from 'windfall' sites within the borough. The Nursery Lane site represents such a windfall site and can deliver up to 22 new family homes towards the overall housing targets.</p> <p>To be considered 'deliverable' the NPPF notes that sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. For sites to be considered 'developable', sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</p> <p>The land at Nursery Lane is both deliverable and developable as it is available and comprises a suitable location for residential development which will assist in meeting the Council's housing targets and will provide homes within the Neighbourhood Plan area. Paragraph 48 of the NPPF states that LPA's should may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. The Council's current housing targets rely on the delivery of future major regeneration sites (such as Kensal and Earl's Court) and windfall sites. The land at Nursery Lane represents a potential windfall site which can deliver new homes for the borough and which is both deliverable and developable.</p>	<p>have confirmed to the StQW Forum that the Borough wide housing target is not apportioned to individual wards. There is no target figure or 'quota' of Housing which the StQW Plan is expected to deliver.</p> <p>As explained in the StQW Draft Plan, Latimer Road also represents a 'windfall' site. As a result of current RBKC policies(which are viewed by local people as over-restrictive for a historically mixed use street) this location has not featured in the Council's housing forecasts. The StQW Draft Plan estimates that 40-60 housing units could be provided though redevelopment of Units 1-14 in Latimer Road.</p> <p>A five year period for housing units to be delivered in Latimer Road is considered realistic. The same applies to the other sites proposed for housing in the StQW Plan (3-5 Crowthorne Road, and 142a Highlever Road)</p> <p>The StQW Forum does not consider the land at Nursery Lane to be 'developable' given the longstanding planning constraints on building housing on this site. The land has not been developed for housing despite development proposals in the 1970s and 1980s. No subsequent attempts have been made, in the light of successive decisions at planning inquires, until</p>	
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	<p>Paragraph 50 of the NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <p>(i) plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);</p> <p>The land at Nursery Lane provides opportunities for increased provision of new homes in particular family homes which reflect the context and suburban nature of the surrounding area.</p> <p>(ii) identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand;</p> <p>Policy StQW 10 does not identify the land at Nursery Lane for the delivery of housing and instead sets out 3-4 Crowthorne Road, 142a Highlever Road and the Latimer Road Employment Zone as sites to provide additional housing.</p> <p>These sites do not represent clear and deliverable sites for the provision of housing, or quite simply they will not deliver enough units of housing and would not be suitable for the delivery of family sized-housing.</p> <p>In respect of the Crowthorne Road site, an application in 2013 for the provision of 20 residential units as part of a mixed use scheme was refused by RBKC as it was considered that it did not outweigh the loss of over 1000sqm of general industrial floorspace.</p> <p>As noted in response to Policy StQW 8 Latimer Road falls within the designated Freston Road/Latimer Road Employment Zone and Core Strategy policy CF 5 which protects the employment uses found within Employment Zones and also resists residential uses. There is strong evidence within the 2009 Employment Land review and subsequent 2013 and 2014 commercial report to highlight that this Employment Zone remains an attractive and viable location for industrial and warehouse uses.</p>	<p>2014.</p> <p>It seems clear that the marketing of the site as potential '<i>residential development opportunity</i>' was prompted by letters in December 2013 from the StQW Forum to the Legard family, advising these landowners that a neighbourhood plan was in preparation which included the Nursery Lane land. This has prompted an attempt to create development value for a piece of land which has not been viewed as a residential site for 30 years, and (in the view of the StQW Forum) is not one now.</p> <p>The options appraisal of housing sites in Section 10 sets out the criteria against which sites have been considered for allocation for housing, within the StQW Draft Plan.</p> <p>The experience in RBKC is that the larger housing units built in the Borough in recent years have been susceptible to the 'buy to leave' phenomenon and do not in the event provide 'family homes'.</p> <p>StQW Policy 10 does not identify the land at Nursery lane for housing because it considers this site to be</p> <ul style="list-style-type: none"> <li>- a greenfield land that is not Previously Developed, on which housing development would be contrary to NPPF, London Plan and RBKC policies</li> </ul>	
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	<p>The site at 142a Highlever Road is comprised of a garage workshop with petrol pumps, and two rows of lock-up garages. Core Strategy Policy CF5 resists the loss of light industrial floorspace, and the Neighbourhood Plan confirms that the site is still in use and the current owner has no plans to dispose of the premises. This raises the question of the deliverability of this site for housing.</p> <p>Conversely, the land at Nursery Lane is available immediately and is both deliverable and developable. It is capable of delivering a substantial number of family homes required to meet local housing targets and local housing need, and importantly, subject to planning, this can be developed in the immediate future.</p> <p><b>Conclusion</b></p> <p>For emphasis, taking all of the above into account, the Neighbourhood Plan fails to have regard to the fundamental principle of neighbourhood planning, as defined in national policy</p> <p><i>“Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”</i> (NPPF Paragraph 184).</p> <p>For all of the reasons provided, as currently prepared, the Neighbourhood Plan does not meet the ‘basic conditions’.</p>	<ul style="list-style-type: none"> <li>- a site which two planning inquiries have concluded is unsuitable for housing development</li> <li>- one of three backlands on which the Oxford Gardens states should not be developed for housing and on which the Council should use its development control powers to this effect</li> <li>- one of three backland sites which the StQW Forum considers meets the criteria for Local Green Space.</li> </ul> <p>The Crowthorne Road site is clearly developable for Housing. The StQW Draft Plan allocates it for this use, and proposes more flexibility over loss of general industrial floorspace in order to incentivise a developer to come forward. The site at 142a Highlever Road is also allocated for Housing. The sites occupied by Units 1-14 Latimer Road are allocated for mixed use with housing above commercial.</p> <p>The StQW Forum does not consider that there is 'strong evidence' that supports current RBKC policies applying in the Latimer Road section of the joint FrestonRoad/Latimer Road EZ. There is demand for well converted 'studio' office space of a kind that the light industrial/warehouse units are now beginning to offer. As required by the NPPF, the StQW policy proposals are responding to this evidence of changing market demand, and are designed to accelerate the supply of such space, with housing above. The type of uses taking up such studio office space are seen as compatible with residential above, a view confirmed by previous mixed use developments in the street, local estate agents, and the many local residents who have responded to the consultation on the StQW Draft Plan. In response to the recent RBKC consultation on Enterprise, 10 out of total 29 respondents across the whole Borough commented on the need for changes to the Council's planning policies as applied to</p>	
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		<p>Latimer Road.</p> <p>The StQW Draft Plan proposes more development than in the Local Plan, through increased intensity of development for housing on the western side of Latimer Road, and on land at 142a St Quintin Avenue (a site which RBKC policies would normally protect as a petrol station').</p> <p>It will be for the Examiner of the StQW Draft Plan (and the accompanying Basic Conditions Statement and Basic Conditions Statement) to decide whether its proposed policies '<i>undermine the strategic policies of the Local Plan</i>' and whether it meets the basic conditions. On the basis of an independent healthcheck of an earlier draft of Plan, and the work undertaken subsequently, the StQW Forum is optimistic of the outcome.</p>	
<p><b>CgMs Consulting, on behalf of the Legard family, owners of the land at Nursery Lane.</b></p>	<p>The Framework requires a Council's Local Plan to meet the needs for market and affordable housing and identify a supply of deliverable (i.e. available, suitable, achievable within 5 years) housing land, with an additional buffer of 5% on the identified need. The further alterations to the London Plan (FALP) states a target of 7330 dwellings within the borough in the period 2015 to 2025.</p> <p>In summary, to meet with the Basic Conditions, a Neighbourhood Plan should identify how it will accord with national and local guidance / policy to deliver housing throughout the plan period.</p> <p>The draft Plan identifies three sites for housing, these being 3-4 Crowthorne Road, 142a Highlever Road and the Latimer Road Employment Zone (draft Policy StQW 10). 3-4 Crowthorne Road was subject to a planning application in 2013 for 20 apartments and commercial space. This application was refused on a number of grounds, with the Council noting that the positives of the scheme did not outweigh the loss of the 1235 sq.m of employment floorspace lost. It is thus questioned whether the site can accommodate the 20 units dictated in the draft Plan, or indeed any at all without further justification. The fact that the Council felt that the 2013 application did not accord with the development plan demonstrates that it does not meet the 'deliverable' tests for housing sites in the Framework.</p>	<p>The most recent application for the Crowthorne Road was rejected on grounds of lack of affordable housing, loss of employment floorspace, and other reasons. It is clearly a developable site for housing and is allocated as such in the StQW Draft Plan. The Draft Plan suggests 15-20 units (the refused permission in 2013 was for 20).</p>	

	<p>The allocation of 142a Highlever Road for housing seems confused. The draft Plan notes a petrol station use is protected in policy terms and that the site also includes a number of industrial units. The loss of a petrol station use would thus not accord with the development plan, nor would the loss of small industrial units (Policy CF5). To seek to address the petrol station issue, draft Policy 10 requires the redevelopment of the site to operate in part as a petrol station. It is however questioned whether the redevelopment of the small site to provide a petrol station with housing in immediate proximity would be supported by the HSE and Environmental Health Officers at the Council. Further evidence to show that a mixed use scheme of a petrol station and housing is possible should be provided before this site can reasonably be allocated for housing. In addition, the draft Plan states the current owner has no plans to dispose of the premises. The site is questionably suitable and is not deliverable.</p> <p>As noted above, the allocation for housing at Latimer Road conflicts with the Development Plan for the area.</p> <p>Overall the Housing section of the draft Plan fails the Basic Considerations as the allocations conflict with the development plan or are not justified, and the draft Policy in Section 10 does not promote the provision of new housing, in line with the strategic policies in the London Plan and the Council’s Core Strategy.</p> <p><b>Summary</b></p> <p>It is detailed above why the draft Plan in it’s current form does not meet the Basic Conditions required to move forward. The terminology of referencing the Clifton Nurseries site within the Plan as ‘open space’ is incorrect as it is demonstrably not as such when considered against the national planning guidance and the Development Plan. The Clifton Nurseries Site should not be included in draft Policy StQW4 and subsequently Annexe 4 should be removed.</p> <p>Policy StQW8 points a) to d) i.e. those relating to land uses, is in direct conflict with the Development Plan and Policy StQW10 does not meet requirements to provide additional housing across the borough and to identify deliverable sites.</p>	<p>The site at 142a Highlever Road is (as stated in the RBKC response to the StQW consultation) a highly unusual petrol station. It is one of the earliest garages in London (1920), has no signage at either of its entrances, and serves petrol to a very limited number of customers using the lock-up garages on the site. The proposal to allocate to Housing in the StQW Plan, and StQW policy 10b do not imply the retention of the petrol station. The StQW Forum consider the site developable for housing, and deliverable as and when the StQW Draft Plan is made and a new policy context set for the site.</p> <p>It is for the Examiner of the StQW Plan to decide on the general conformity of the StQW policies to allow housing in the EZ sections of Latimer Road. Section 10 promotes the provision of new housing units, in numbers significantly greater than proposals exhibited in December 2014 for 21 houses on the Nursery Lane site.</p> <p>The Basic Condition Statement to be submitted with the StQW Draft Plan will set out the detailed reasoning on why the Plan meets the requirements of legislation. It will be for an Examiner to determine these issues but on the basis of an independent healthcheck carried out on an earlier draft, with recommendations then incorporated into the Consultation Version of the plan, the StQW Forum is optimistic on the outcome.</p>	
<b>12. MANAGING DEVELOPMENT</b>	<b>NB THE SUBMISSION VERSION OF THE StQW DRAFT PLAN NO LONGERS INCLUDES AND OBJECTIVE 12 IS COMMENT BE</b>		
<b>NAME AND ADDRESS OF RESPONDENT</b>	<b>COMMENT OR SUGGESTION</b>	<b>StQW RESPONSE TO COMMENT OR SUGGESTION</b>	
Angela McConville,	Thank you for the opportunity to comment on the St Quintin and Woodlands Draft		

<p><b>Westway Trust</b></p>	<p>Neighbourhood Plan.</p> <p>The Draft Plan is an impressive document and reflects the care, attention and concern that the participants in the Neighbourhood Forum have applied in its preparation. There is much in the Draft Plan, particularly relating to the visual appeal of the existing housing stock, that the Trust feels is best left to local residents to comment upon. We do, however, have a number of comments to make on the Draft Plan as it affects the Westway Trust's own estate and our ability to maintain and improve the estate for the benefit of the local community:</p> <p>It is wholly inappropriate for the Neighbourhood Plan to prescribe such a speculative and limited use on Westway Trusts land at 301 Latimer Road (save for the provision of a foot tunnel to link to Imperial West) until the issue of a new transport intersection at Latimer Road is decided. Whilst we support in general the improvement to infrastructure links within the area, a potential station on the land is merely speculative and it would be contrary to the community benefit to fetter the Trust's development possibilities by a proposal that may never be realised and, on the basis of an already identified alternative location, is more likely to happen off our estate than on our estate. Similarly, while the Westway Trust is a supporter of the foot tunnel from Imperial West, it is not within the Trust's gift to deliver the tunnel, and therefore the land should not be sterilised in perpetuity in the event that the tunnel is never delivered. On that basis Policy 5b should be deleted from the neighbourhood plan.</p> <p>Additionally, we believe that Policies 3a and 3b should be deleted from the neighbourhood plan, on the grounds that the items are overly prescriptive and that existing planning</p>	<p>The land under Westway managed by the Trust (since the late 1960s) is leased from Transport for London to RBKC, and sub-leased to the Westway Trust. It is hence public and not private land, which the Trust manages on behalf of the community. Where a potential transport use is identified, of benefit to many RBKC residents, it seems reasonable that this land should be allocated for a public use. The site at 301 Latimer Road has been used as a car park, with temporary planning permissions renewed at intervals, since the Westway was built.</p> <p>The proposed pedestrian/cycle underpass due to be built on this site is enshrined in a S106 Agreement between LBHF and Imperial College and has reached planning permission stage and is required to be built before the completion of the next stage of Imperial West. Given the history of this site, its allocation for future transport use is considered reasonable. The RBKC comment on this site allocation is <i>'The Council recognises this would support the function and character of the employment zone'</i>.</p>	
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	<p>controls provide sufficient safeguards in relation to the conservation area.</p> <p>Under part 8 of the draft plan, while the Westway Trust is supportive of the attempts to stimulate the regeneration of the Latimer Road area, and also of the relaxation of policies with regards the allowance of residential development above ground floor commercial uses, the Neighbourhood Plan should not seek to be so prescriptive on heights to the western side, rather, that existing planning controls should be allowed to determine applications on a case by case basis according to specific context.</p> <p>umber of Action Points for the Neighbourhood Forum listed in the Draft Plan should be removed or amended as they do not relate to planning policy and those that remain should be established as a separate Forum Action Plan. For example, the Draft Plan proposes that the Forum should continue to lobby the Trust on aspects of the outdoor media sites within the curtilage of the Westway Sports Centre. That does not relate to planning policy on land within the proposed Neighbourhood Planning area. Furthermore, the reference to the Trust having “reliance” on the income from outdoor media sites is incorrect in fact. The Plan should more properly state that planning policy should balance the public benefit that the Trust can deliver through income from outdoor media sites with the environmental considerations of local residents.</p> <p>It is worth reiterating that Westway Trust believes it is at best unhelpful, and more likely counter-productive, to include any of the Trust’s estate in the area covered by the Draft Plan. The greater majority of the area covered by the Draft Plan comprises the local Conservation Area and most of the detail of the Plan addresses the specific concerns arising from the residential stock therein. A Supplementary Planning Document that covers the Trust’s estate has already been adopted in 2012 and it is sensible that the SPD together with the Core Strategy, be the persuasive policy for those areas.</p>	<p>The StQW Forum does not consider these proposed policies to be 'overly prescriptive' and no further justification is offered by the Westway Trsut for their removal from the StQW Draft Plan. The Trust manages no land within the Oxford Gardens CA, but gains income from a 30m outdoor advertising tower some 90m from the boundary of the CA, a longstanding planning issue locally. The proposed deletion of polices 3a and 3b may relate to this structure, and is resisted by the StQW Forum.</p> <p>Policies on outdoor advertising structures are clearly a planning matter and are addressed in the RBKC Core Strategy and the RBKC SPD for the Westway area. The advertising structure at the Sports Centre (severely) and is a proper issue to be addressed in the NP. The term 'reliance' will be reviewed. The Trust has refused over many years to reveal what income is derived from the advertising tower at the Westway Sports Centre, but maintains that this income stream is critical to maintaining certian of its programmes. This is a degree of 'reliance'.</p> <p>This debate was held prior to final decisions by RBKC on designation of the southern boundary of the StQW neighbourhood area, The Council amended the originally proposed boundary, but accepted arguments that the strip of land behind houses in Oxford Gardens should be included in the NP area, as designated in July 2013. The Trust gives no reasons as to why this decision should be seen as 'unhelpful' or 'counterproductive'. The StQW Forum does not accept that the Westway Trust should be able to deny the</p>	
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		introduction of StQW policies within a neighbourhood plan.. The Trust in the past has shown very little regard for the views of local residents, in the management of its property estate, albeit that dialogue has improved in recent years.	