

## DRAFT RESPONSE FROM STQW NEIGHBOURHOOD FORUM TO RBKC CONSULTATION ON NEW LOCAL PLAN REVIEW (NLPR)

**(Suggestions welcome from StQW/SHRA members before this response is sent in to the Council on November 10<sup>th</sup>)**

We are a neighbourhood forum in the north-west corner of the Borough, with a 'made' neighbourhood plan adopted by the Council in 2018. The designated neighbourhood area covers the western part of St Helens ward and the southern part of Dalgarno ward. Our membership of 370 residents and businesses is the same as that of the St Helens Residents Association.

We welcome this opportunity to feed in views at this first stage in the preparation of a new Local Plan. The 'issues' paper is helpful in being clearly written and with less jargon than in many similar documents from local planning authorities.

We appreciate the difficulties of embarking on a new Local Plan at a time when Government is consulting on major reforms to the English planning system. The 'issues' document covers some of the potential implications for the format and content of a new Local Plan, but much uncertainty remains as to how far the Government's proposals will be implemented, and over what timescale.

We have drawn on information that has surfaced since the White Paper on planning reforms was published, but the final outcome on the White Paper proposals remains guesswork in several respects. Our response to the issues document uses the questions that are posed, and we have answered only those which seem most relevant to our part of the Borough and to policies/designations relevant to the StQW Neighbourhood Plan.

### Q 1.1 What do you think should be included in the New Local Plan's vision?

Vision statements need to be kept brief. We support all three of the bullet points at 1.15 of the NLPR and suggest a fourth is added. This would reflect the longstanding theme in RBKC Plans of 'Keeping life local'. The Covid pandemic has reinforced the importance of London retaining its multiplicity of 'urban villages, each self-sustaining in terms of local shops, chemists, health centres/GP surgeries and offering housing at all stages of life including 'Generation Rent' as well as households late in life and those living alone.

These key attributes of the city have long been under threat from shrinking public services, coupled (in RBKC) with extreme housing values. Major shifts in demand for office and conventional retail space look likely to take place while this new Local Plan is prepared. **This underlines the need for flexibility within any new RBKC policies on building uses.** We share the view that 400 page Local Plans are off-putting for most of the public. The new E use class will anyway enable building users to vary uses to ensure viability or improve financial returns.

We support the current renewed interest in 'walkable neighbourhoods' and would like to see this reflected in a new Local Plan along with a more specific definition of what makes for a successful neighbourhood within a global city. London is often described as a city where many residents are transient, never get to know their neighbours, and take little interest in their immediate environment.

The pandemic has begun to change attitudes, and a new Local Plan could help to reinforce why 'neighbourliness' is important and how it can be encouraged through planning policies and land allocation.

### Q 2.1 Do you think we have identified the correct Places?

We question whether a 'White Paper version' of a Local Plan will allow for 'Place Chapters' that go beyond 'zoning' decisions and specific site allocations? We also think that if such chapters remain they should be at the back of a new Local Plan document, rather than the front, or even in an annexe.

In terms of the choice of the 12 proposed 'Places', we are consulting with our membership on the merits of Latimer Road as one of these 12 locations.

As a defined 'Place' in a new Local Plan this small area is not remotely comparable in size or importance to the 'Places' of Kensal or Kensington High Street

Latimer Road is a single street which includes four separate sections designated since the 1990s as part of the Freston/Latimer Employment Zone. The street has been physically separated by the Westway from Freston Road since the 1970s.

This location is much smaller than the other five 'Places' proposed as 'areas of change'. We welcome the idea of this part of North Kensington receiving more focus in a new Local Plan, as there are longstanding problems of underinvestment in the area. But in the preparation of a the new Local Plan there needs to be clarity that:

- Latimer Road will be seen as a 'renewal' zone and not a 'growth' zone in terms of the White Paper categories and for 'gentle intensification'. This is recognised in the map at page 17 of the Issues paper, but paragraph 22.1 of the Issues document refers to six 'places' that can '*accommodate growth*' and refers to these as '*areas where significant new development can take place*'. Latimer Road cannot sensibly be categorised in such terms.
- The StQW Neighbourhood Plan identified in 2015 the scope for 50-80 housing units to be delivered over time, through redevelopment of the light industrial/warehouse units 1-14, with new housing above employment space within policy LR5 on building heights. We understand that RBKC have assumed the 80 unit figure in its housing trajectory forecasts.
- As a set of street-specific policies in a 'made' neighbourhood plan these policies will continue to take precedence (under the NPPF) over Borough-wide policies in the 2019 Local Plan. (This position is acknowledged in the 2019 Local Plan).
- The new Local Plan includes assurances that the Council is not intending to reverse the policies for Latimer Road achieved via the neighbourhood plan and will at least consider extension of the scope for mixed use (see our comments on RBKC Policy CF5 below).

We think it would be worth the Council considering the North Pole Road shopping frontages as part of a combined 'Place' with Latimer Road. So too could the St Quintin Gardens/Highlever/St Quintin Avenue 'triangle'. This slightly wider area than Latimer Road alone was discussed and provisionally agreed with RBKC officers in late 2019, when discussions on a design code and SPD for the street were started.

As one of very few entry/exit points to RBKC this street badly needs focus on its traffic congestion, and liaison with LBHF on enforcement of parking restrictions. One long-term vacant shop has been reopened as a health and wellbeing store which has been widely welcomed. But the viability of the shopping parade remains marginal. Funding for CCTV has been sought by the StQW Forum as a NCIL bid.

It would also be worth RBKC considering the Freston Road part of the combined EZ. The table at page 13 makes the following claim

The Latimer Road Employment Zone will become a hub for new creative industries. Development will be intensified and will provide new, modern workspaces and some new homes. Public Realm improvements will make the area feel safer and more inviting.

We see this as over-promising. Policy LR3 in the StQW Plan is indeed ***To encourage building uses which support the creative and cultural industries, and which contribute to the Royal Borough's policies on Cultural Placemaking and RBKC Core Strategy Policy CR6.*** Similar aims are expressed by the Council for the Kensal and Freston Road Employment Zones. We are keen not to raise false expectations of local residents, particularly when the planned Wood Lane/Latimer Road underpass remains subject to final go-ahead from Imperial College (due early 2021).

We also feel that an element of confusion has crept into the terminology used in the NLPR document, as between the labels proposed in the White Paper for 'zones' as compared with those used by RBKC. Because the Government's proposals for Local Plans involve the identification of all land under three categories labelled as ***Growth, Renewal and Protection***, any use of the term 'growth' needs to take account of this new context and should not be applied to potential 'renewal' areas.

In the 2015 Consolidated Local Plan and in the 2018 Local Plan Partial Review, the Latimer 'Place' covers the area around Latimer Road Underground station and the two parts of the Silchester Estate. The map and 'vision' for Latimer in those documents related to estate renewal proposals planned at that time, but then dropped by the Council post Grenfell. The 2019 Local Plan makes only brief reference to a Latimer 'Place' and includes no map defining its boundaries.

Most residents living in or near Latimer Road would say 'I live in St Helens' and few would identify with living in 'Latimer' as a place. As a result of historic changes in the road network Latimer Road is over half a mile and a 12 minute walk from Latimer Road Underground station (a fact that causes much confusion to visitors to the area).

We support the idea that Lancaster West and the Grenfell Tower site should be covered as a separate section of the a new Local Plan, given that the consequences of the fire and of the regeneration of the estate will remain a major issue in the Borough for many years to come.

#### **Q 2.2 The Council will look again at the existing visions for these Places and consider whether remain appropriate. Do you have any views on the visions for the Places in the current Local Plan and how the new ones should be drafted?**

As above, the mini-vision statements on page 17 for each of the 'Areas of Change' over promise in guaranteeing the future of these areas of development as becoming 'thriving' and 'vibrant destinations'. We feel that a greater degree of honesty is needed about the fact that, under the present London Plan and Government directives, both Kensal Canalside and Earls Court risk being planned and built out at densities and heights which RBKC would probably not be going along with if the Council had full discretion on its Local Plan.

**Q 3.1 Are you aware of any sites that might be suitable for new development?**

If so, please provide us with:

- the site location
- the potential type of development
- the scale of development; and - possible constraints on development such as historic buildings, parks and open space or protected uses such as offices, education, medical uses.

The StQW Neighbourhood Plan identified Latimer Road for missed use, and RBKC own Unit 12 which should be reviewed as a potential housing opportunity. The narrow backland site at Highlever Garage (142A) is also allocated as a potential housing site. The Draft StQW Plan included the site at 3a Crowthorne Road but this was removed by the Examiner on the basis that a planning consent had been granted for a mixed use scheme. This consent has never been implemented, demonstrating that viability in this part of North Kensington remains marginal. On a new Local Plan, RBKC needs to examine why schemes have not come forward and whether this has been the result of onerous planning conditions. Fluctuations in the London housing market seem likely to continue for the foreseeable future, inhibiting development of smaller sites.

**Blue Green future**

Carbon neutral or zero carbon largely means stopping using fossil fuels, so two issues are faced; reducing our energy needs and changing their source to non fossil i.e. electricity and heat from solar, wind and tidal.

Therefore support for onsite generation of energy as well as insulating buildings is needed; it needs to be a two pronged approach as if all our energy is clean then the insulation requirements diminish

**Q 4.1 Should the NLPR support the use of innovative materials, techniques and technology to assist in the retrofitting of existing buildings to ensure greater sustainability bearing in mind in some cases this may come at a cost to the character of the existing building stock and of our conservation areas?**

We support new materials and retrofitting provided done sensitively. Key to reducing energy demand is to insulate the old building stock, and external insulation is easier to do than internal (but changes the appearance). We suggest that the rears of properties are often not so sensitive to the character of an area so over-cladding with insulation and render is not as harmful there.

Conservation style photovoltaics are available which are barely visible in slate roofs and should be Permitted Development or consented even where an Article 4 Direction is in place. The same applies to the allowance of up to 150mm adjustment in roof levels for increasing insulation (StQW Policy C2).

Most heat escapes through windows, and the norm is refitting triple glazing, which is much heavier and can be hard to achieve with large sash windows, so alternative opening arrangements should be allowed. External shutters which roll down with adjustable louvres should be allowed, as they provide shading and insulation as well as security. The top box can be invisible if integrated into the lintel.

**Q 4.2 For listed buildings we will need to find a balance between bringing them up to high standards of sustainability and the need to preserve their special architectural or historic character. Do you have any comments on this approach?**

Listed Buildings need to be assessed for which parts of them are actually of historic value - instead of the carte blanche approach of protection - so that measures can be introduced where they do not harm fabric of value. Even covering valuable fabric can be done in a way that does not harm the history of it even though it makes it less visible.

**Q 4.3 Should the NLPR require all new development to be net zero carbon? This means looking at the whole life cycle of development from the design and materials used during construction to how the building is used to ensure it does not generate any additional carbon. Carbon can also be reduced by using renewable energy sources to provide the energy needed by the building's residents and users.**

For new construction net zero carbon should absolutely be the target

**Q 4.4 Should the NLPR require new developments to be “air quality neutral” at each stage of its life? This means that the emissions linked directly to the development such as for heating or travel will not lead to deterioration of air quality.**

*A desirable aim but beyond our technical competence to comment on its realism.*

**Q 4.5 What noise and vibration sources should be addressed directly in the Local Plan?**

The RBKC Construction Code has helped but too many contractors (even when confronted with a copy by local residents) continue to ignore it.

**Q 4.6 Should the NLPR take a more proactive approach to reducing the impact surface water (rain) flooding, and if so, how can the benefits of green infrastructure be maximised.**

We think that RBKC Policy CE2(f) resisting impermeable surfaces in front gardens is often missed by applicants and could usefully referred to alongside conservation policies rather than included in a separate chapter of the Local Plan.

**Q 4.7 Do you have any ideas about how new developments can improve on biodiversity in the Borough?**

It would help to try to create green links between all green spaces so that wildlife is not isolated in pockets.

Green verges with wildflowers introduced where paving widths allow.

**Q 4.8 Are there any areas which you think should be recognised for their importance to biodiversity? This will help us to consider them when we update our evidence on SINC areas.**

All existing open spaces. A new Local Plan should make clear a high level of protection to Local Green Spaces designated via a neighbourhood plan, along with open spaces that have emerged in the Borough through local community efforts, such as Meanwhile Gardens.

**Q 4.9 Should the NLPR take a more holistic approach to ensure green infrastructure and its benefits are maximised in new development? If so, do you have any suggestions how this may be achieved?**

All flat roofs should be either green or solar panelled.

**Q 4.10 Should the NLPR support the Circular Economy approach and require development to prepare circular economy statements? If so should this be for all development or just major development?**

An awareness of the Circular Economy should be incorporated in all new developments

#### **Question/s**

**Q 5.1 Do you have any comments on the above suggestions to improve delivery of homes on each site?**

Concerns of local residents about 'buy to leave' residences, purchased as assets and left vacant, remains high even if there has been a fall in offshore buyers. We understand that in from 1979 and into the 1980s the Council operated a policy under which compulsory purchase action was initiated against owners of properties left unoccupied for more than 12 months. It was apparently extremely rare to have to take the threat through to an inquiry, but in extreme cases this did happen, and a CPO was granted. This sounds like a policy well worth re-examining.

**Q 5.2 Do you have any other ideas to improve housing delivery in the Borough**

We would support the Borough in finding ways of ensuring that those new homes which do get built are then occupied rather than used solely as investment assets. We are aware that neighbourhood plans have introduced Principal Residence Policies which have survived legal challenge.

**Q 5.3 Do you think we should stop the loss of any homes as described above unless there is a robust case for an exception to be made?**

Within the StQW neighbourhood are there are houses whose 'basic' footprint is above RBKC's 170 sq m 'new home' criterion on amalgamations. We support a policy that amalgamations should not lead to loss of more than one housing unit.

**Q 5.4 It is unlikely that the Council can retain its affordable housing policy trigger of 650 sq. m as we will need to align our approach with the national and legislative changes. However, should we endeavour to do so if we have the evidence to support such a position?**

A Government policy of setting the affordable housing threshold at 50 units, even for a two year period, would severely reduce the number of new affordable homes in the borough and should be resisted. The current RBKC policy on a 650 sq m threshold is an outlier as compared with national policy. If it were to be retained in a new Local Plan it should be applied with careful assessment on the impact on viability. For small-scale redevelopments,



the prospects will inevitably be slim of finding a Registered Provider willing to manage a single affordable unit.

**Q 5.5 Do you have any views on the housing products that we consider to be genuinely affordable? Given 25 per cent of affordable homes could be required by legislation to be First Homes for sale, should there be any other types of affordable housing in addition to those described above?**

If the First Homes scheme will have a price cap of £420,000 in London there will be very few eligible properties in RBK&C (so whether a discount of 50% rather than 30% were available would make no difference on the supply side). We are surprised that there is no mention of shared ownership (SO). This merits a single paragraph in the Council's Community Housing Supplementary Planning Document of June 2020 (household income cap of £90,000 etc).

An example of a '25%' shared ownership scheme is St Quintin House in Pangbourne Avenue provided by Clarion Housing Group. Residents include many young professionals - some with families. In the 1970s the Council found ways of supporting small co-ownership housing associations to refurbish or build new housing schemes, with occupants able to obtain 100% RBKC mortgages on long leases. Such housing products may no longer be possible but the Council needs to do something to enable the 20-35 generation to remain in the Borough.

**Q 5.6 Do you have any views on older people's housing provision in the Borough both in terms of the support the NLPR needs to provide and the type of accommodation to be provided? If you were moving to older peoples' housing what would you like to see?**

We see a need for more extra care housing.

**Q 5.7 Do you have any comments on the other forms of housing set out above or any information that may help support the evidence?**

As above.

**Q 5.8 We consider that most parts of the retained policy CH5 are still fit for purpose, but it can be updated to be further strengthened as described above. We would be guided by the community on this. Please provide us with your views.**

RBKC schemes for estate renewal have a difficult track record. The renewal of the Wornington Estate (by Clarion Housing Association met with met with This relates to RBKC's estate renewal policy, which it does not intend to change (but the Council dropped all specific plans and site allocations for estate renewal after Grenfell. RBKC will find it very hard to meet housing targets, even at current London Plan levels, without any estate renewal. The targets implied in the recent Government algorithm for spreading 300,000 new homes across England look completely unattainable.

**Q 6.1 Are there any measures introduced as part of the Covid-19 recovery which should be used elsewhere in the Borough, or which should be made permanent?**

*Pop-up cycleway in Ken High Street has not gone down well. RBKC must be grateful that its proposed Low Traffic Neighbourhood in Ste Helens/Dalgarno was stopped after our early feedback. Wandsworth and Ealing have had to abandon such schemes after a few weeks of large-scale protests.*

**Q 7.1 Should the Council continue its current approach and, when it can, protect all offices across the Borough, unless it can be established that there is no long-term future of an office in that location?**

**Q 7.2 Are there any parts of the Borough where it is no longer appropriate to protect offices, or any types of buildings which are inherently unsuitable for an office use?**

**Q 7.3 Should the Council continue with its “business led” requirement for development within the Employment Zones?**

Given uncertainties in the property market, it is likely to prove impossible in the foreseeable future for RBKC to establish whether there are long-term prospects for viable office use at specific locations in the Borough. The major change in working and commuting patterns, and the extent to which organisations are reconsidering their outgoings on office space, are showing up in surveys in all major cities across the globe.

Coupled with the introduction of the E1 use class, we suggest that a new RBKC Local Plan should pursue a far more flexible approach to the use of non-residential buildings. There is no merit in seeking to impose specific uses, or to protect existing uses, if such policies result in empty buildings. RBKC will retain some powers to limit uses which are environmentally damaging or which cause neighbour nuisance, but a rethink of Local Plan policies on all non-residential uses is now needed.

We are not aware of any study of the extent of homeworking, as a significant part of the Borough’s economy, in the pre-lockdown era. We think ‘working from home’ has been extensive in North Kensington for many years. Hence many sectors of the Borough’s economy may remain healthy in the years to come, even if occupation levels in what has hitherto been classed as B1 office floorspace shrink markedly. A new Local Plan should focus more on how redundant building stock can best be re-purposed for new uses, including residential.

In this context we believe that RBKC Policy C5 should be revised and should drop the restrictive elements relating to office space in Employment Zones (CFi to CFn). Protection of existing light industrial space has perhaps more justification, as there are certain uses which residents need relatively close to home (e.g. motor vehicle repair).

In the case of Latimer Road, we consider the EZ status assigned to Units 1-14 and to three separate sections of the eastern side of the street to have been unhelpful for many years. Latimer Road has been a mixed use street since the 19<sup>th</sup> century. The physical nature of the street, alongside a railway line, means that residential values will never approach the ‘prime London’ values which could force out all uses other than residential. The gap between office and residential values is already smaller than in other parts of the Borough.

De-designation of the EZ sections of the street, we suggest, should be seriously considered for inclusion in the new Local Plan.

Assuming the proposed underpass between Imperial College/Wood Lane and Latimer Road is finally commissioned (decision due early 2021) we believe that the street will be viable for a range of successful E1 uses of the kind which can serve the immediate neighbourhood and a wider area.

Although RBKC has long opposed ‘live/work’ planning consents as such, we think that Latimer Road will develop further as a street which attracts those who wish to arrange their lives so that their ‘home’ and ‘workplace’ are in close proximity, if not in the same building. Hence redeveloped buildings that include a mix of E1 floorspace along with C3 floorspace will be in demand. We do not



see it as necessary for new Local Plan policies to be prescriptive in pre-determining fixed proportions of each, at least for the next five years.

**Q 7.4 Should the Council promote the provision of new premises which are suitable for new light industrial uses, and protect their loss to residential uses?**

While we can see some merit in protecting specific light industrial uses that residents would like to have at close proximity, as opposed to e.g. at Park Royal, we are not clear how such promotion and protection can be achieved given the August 2020 relaxation of use classes.

**Q 7.5 Should the Council require the provision of affordable workspaces for appropriate new commercial developments?**

**Q 7.6 Do you have a view on the most appropriate models to help provide these affordable workspaces, or who should be eligible to benefit from such workspaces?**

We would welcome effective policy routes to providing affordable workspace, but not where these involve loading resultant costs onto developers (other than on major mixed use schemes). As the NLPR notes, resourcing an affordable workspace policy through planning obligations reduces the balance available for affordable housing.

In those wards where NCIL receipts are proving to be substantial, use of part of these receipts to subsidise workspace for defined categories of business start-up could make sense. A new Local Plan should at least include a policy under which such initiatives can be pursued.

**Q 8.1 Should any other types of use be included within the Council's definition of a social and community use?**

We think that cultural uses delivered by charities or not-for-profit organisations (such as arts venues, galleries, cinemas, could usefully be added to this list. And that training facilities (not for profit) should be added to the RBKC categories.

**Q 8.2 Should there be any circumstances (outside the freedoms allowed by the Government's new regulations) when the Council should allow the loss of a social and community use?**

Only when the proposed change of use is to a very obvious higher priority alternative.

**Q 8.3 Are you aware of the lack of any particular facilities in your area?**

The sheltered housing at 1 Nursery Lane dates from the 1970s and the building needs to be included within a programme for major refurbishment or rebuild.

**Q 9.1 How should new development support modal shift from private car travel to walking and cycling?**

We continue to support a policy that new developments should be 'car-free'. But the Covid pandemic has reinforced the public's desire to make journeys by car as a safer option than using

public transport. If recurrent episodes of this or other respiratory viruses become a part of life, it will be even harder to shift people from use of some form of personal private transport.

Such transport will not have to take the form of a large or polluting vehicle. The market may respond further with variants of very small city cars, sit-down e-scooters, enclosed electric bikes/trikes which do not pollute or take up much road space.

For families with babies and small children, it is hard to carry out necessary journeys other than by some form of private vehicle unless high quality and regular public transport is available. The more a Local Plan can encourage 'walkable neighbourhoods' with sufficient shops and facilities within a 10 minute walk, the easier it will be to encourage modal shift.

We question whether the modal shift which emerged during a clement 2020 summer with a pandemic. Walking and cycling are not popular in dark wet winters which are 50% of the year. London's infrastructure needs to allow Londoners back to work and roads to flow smoothly in a joined up way for electric and driverless cars of the future as well as encouraging economic recovery.

#### ***Q 9.2 Under what circumstances is off-street parking in new developments acceptable***

We consider it acceptable albeit that viability will often mean that this solution is feasible only for luxury housing.

#### ***Q 9.3 How should the Council ensure that new developments give the strongest incentive to residents and businesses that use them to avoid using petrol or diesel vehicles?***

No suggestions beyond the Council's proposed new system of basing resident permit costs on emissions.

#### ***Q 9.4 What should be the Council's priorities in seeking new development-funded transport infrastructure?***

Along with the West London Line Group we initiated ideas for an additional Overground station at 'Westway Circus' when the StQW Neighbourhood Plan was being prepared five year ago. We urge the Council to continue to promote this option in a new Local Plan and in discussions with TfL.

It is now very clear that the previous OPDC and TfL proposals for a £200m Overground station at Hythe Road have been entirely abandoned. Much public money was wasted in preparing plans and carrying out a public consultation on this proposal.

As part of the evidence base for anew Local Plan, we urge the Council to work with TfL, LBHF, Imperial College, and Westfield to revise and update the previous viability study carried out for an Overground station at North Pole Road. The additional station added to the WLL at Imperial Wharf Involved a basic set of platforms with a total budget below £11m, funded by LBHF, RBKC and Planning obligations. The planned underpass would provide access to and egress from both tracks, for RBKC and LBHF travellers.

Poor PTAL levels in the north west part of the Borough would be significantly improved with such a new station. Traffic on Wood Lane/Scrubs Lane, and the pinchpoint at North Pole Road remains a constant source of delay for the whole of North Kensington. The prospect of the planned TfL dedicated cycleway along Wood Lane is viewed with foreboding.

**Q 10.1 Do you feel there are enough places within the Borough that children can play formally or informally? What form would you like to see these take?**

We see the Borough's parks and open spaces as a key contribution to quality of life in the Borough and welcome the fact that an up to date audit of all open spaces will form part of the evidence base for a new Local Plan.

The designation of three Local Green Spaces in the StQW Neighbourhood Plan will (we trust) be reinforced in the new Local Plan. The Kelfield (Methodist) open space now provides a 'Forest School' outdoor play facility (<https://www.newstudiopreschool.net/forest-school.html>) as well as well as outdoor play space for the New Studio Preschool (<https://www.newstudiopreschool.net/>). The West London Bowling Club off Highlever Road has become an increasingly well used local facility with a restored garden and petanque pitch.

The Local Green Space at Nursery Lane operates as a commercial plant nursery, as was its function in the decades from the 1970s until a 2015 attempt by the landowners to develop the site for luxury housing. This continued use as green space has helped to mitigate the poor air quality at the St Quintin/Barlby/Highlever 'triangle', where lengthy queues of traffic emit pollution every day in the late afternoon.

**Q 11.1 Could tall buildings be located on less sensitive locations in townscape terms to help meet our housing targets? If so, do you have any views on potential locations for taller buildings?**

**Q 11.2 Should we develop more detailed assessment criteria for taller buildings?**

The Council's policies of resisting tall buildings other than in very few locations has been hugely important to the future of the Borough. We believe that in future decades this policy will prove to have been entirely justified. The approach to tall buildings taken by LBHF, LB Ealing and by the Old Oak and Park Royal Development Corporation runs serious risks of creating 'the slums of the future'.

The NLPR document points out that RBKC may be forced to accept much increased building heights in future, as a result of Government imposed housing targets. The existing Mayoral target of 3,500 new homes at the Kensal Canalside already involves reliance on building typologies and housing densities significantly higher than for the renewal of the Wornington Estate.

We believe that 2020 will prove a turning point for the proliferation of tall buildings in London, as did the Ronan Point disaster in 1968. The public are all too well aware that social distancing, elevators in residential towers, and lack of private outdoor space do not combine well.

On the boundaries of the StQW neighbourhood the OPDC continues to grant permissions to residential towers of 20 storeys and along Scrubs Lane. OPDC now threatens the same on the North Pole East railway yards and the 1980s Mitre Bridge Industrial Park. LBHF has approved multiple very tall buildings at White City East and along Wood Lane.

Such buildings are very expensive to maintain, poor on biodiversity, offer very limited access to private open space beyond a small balcony, and currently require residents to queue for reduced space in lifts. If RBKC needs to prepare a *more detailed assessment criteria for taller buildings*, we (and no doubt other resident and amenity bodies) will be happy to contribute.

**Q 11.3 Do you have any views on the approach that the existing design policy should be expanded to secure high quality and exemplary development?**

We wait to see how the ‘Building Beautiful’ aspects of the White Paper, including a national Design Code and possible new version of CABE, will pan out. A ‘character study’ for the whole Borough sounds ambitious and as the NLPR paper says *‘some parts of the Borough have a very mixed character and it can be difficult to establish what scale and style of development is appropriate’*.

We think its essential that under any new planning regime for England, both Local Plans and neighbourhood plans continue to be able to set development management policies at a ‘place specific’ level of detail.

It is hard to conceive how nationally determined generic development management policies could possibly replace the set of conservation and design policies which RBKC has developed through successive Local Plans. At the most ‘localist’ layer the StQW Neighbourhood Plan has then been able to fine tune Local Plan conservation policies in ways that enable Victorian and Edwardian houses to be adapted for contemporary use (such as varying Local Plan policies which allowed for loft rooms and rear dormers in some streets but resisted them in others).

Local Plan policies across the country routinely demand *high quality and exemplary development*. Yet permissions are often granted to developments which the public see as examples of very unattractive architectural design and with no human scale or relationship to the street. A national Design Code might begin to bridge the gulf between what developers seek to maximise site value, and what the public perceive as buildings that they would wish to live or work in. But as research by Create Streets and others have shown, this is a wide gulf at present.

Of the existing RBKC policies referred to at 11.15 of the NLPR we see CL5 on Living Conditions as important. This includes sub-policies such as that on ‘sense of enclosure’ which have been applied locally for many years yet are unlikely to be covered by any generic NPPF policy. The same applies to CL7 on Basements. It would be a severe backwards step if a new RBKC Local Plan was not allowed to include such a detailed and precise policy.

**Duty of Co-operation**

The Government’s White Paper proposes to abolish this statutory requirement for Local Plans. In a London context, it will remain essential that neighbouring planning authorities work together whenever possible. Located on the border of LB Hammersmith & Fulham, and the OPDC, our neighbourhood hopes that a new Local Plan will maximise the influence that RBKC can bring to bear on both these planning authorities.

A new concern is that the OPDC intends to bring forward within its own Draft Local Plan the redevelopment of the North Pole East railway yards and possibly the Mitre Bridge Industrial Estate, for very high density housing. These sites lie immediately north of Little Wormwood Scrubs, an open space which RBKC has managed on behalf of LBHF for many years. The immediate east lies the Kensal Canalside Opportunity Area, which RBKC is currently master planning.

It would be disastrous if OPDC and RBKC pursue their own separate strategies for these adjoining areas, on connectivity and transport issues amongst others. For example, the case for an Overground station at Westway Circus has been strengthened by OPDC proposals to bring forward development of the North Pole East site.

Our (extensive) experience of OPDC is one of unwillingness on the Corporation's part to engage genuinely with local residents, and a lack of transparency and local accountability in its decision-making. We urge RBKC to ensure that its processes for preparing a new Local Plan maximise dialogue and joint working with OPDC. Present regular meetings between OPDC and the Boroughs appear to be limited to Brent, Ealing and LBHF.

StQW Neighbourhood Forum  
October 2020