



## St Quintin and Woodlands Neighbourhood Forum

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### **RESPONSE TO THE WHITE PAPER *PLANNING FOR THE FUTURE* From the St Quintin and Woodlands Neighbourhood Forum**

We are a neighbourhood forum in North Kensington, designated in 2013. Our neighbourhood plan was successful at referendum in 2016 and after surviving a legal challenge was 'made' by RB Kensington and Chelsea in 2018. We wish to comment mainly on those questions in the White Paper that relate to the content of the NPPF, Local Plans and neighbourhood plans and the relationship between these layers of the current planning system in England.

We participate in the London network of neighbourhood planners and support the submissions on the White Paper made by NeighbourhoodPlanners.London, as well as the responses made by RB Kensington and Chelsea and the Kensington Society.

#### **Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

We do not see it as either realistic or sensible to attempt to '*set out general development management policies nationally*'. The built environment across England varies enormously from rural villages to major cities.

While a government is entitled to set high level planning policies via a national planning framework (as has been the case with the NPPF since 2014) such policies need to be translated and fine tuned at each lower spatial level.

For London, we support the retention of a London Plan that ensures that London LPAs make plans within a regional framework. At Borough level we support a system of Local Plans that are prepared and consulted on by democratically accountable councils. From our own experience we also strongly believe in community-led neighbourhood plans which can fine tune Local Plan policies to smaller areas.

At each level of plan making, the principle of 'general conformity' with the layer above is a sound one, provided it is observed. If all LPAs were to adhere to the NPPF requirement to distinguish between 'strategic' and 'non-strategic' policies when preparing their Local Plans, there would be more neighbourhood plans now in place in London. As it is, London planning departments have proved reluctant to surrender policy space to neighbourhood plans. The role of neighbourhood plans needs to be embedded more firmly under a new national regime.

#### **Q13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?**

Yes, we strongly agree. But we were alarmed at the lack of detail and specifics in the White Paper on the scope of neighbourhood plans in the future. The statement *Therefore, we think Neighbourhood Plans should be retained in the reformed planning system, but we will want to consider whether their content*

*should become more focused to reflect our proposals for Local Plans* is completely opaque and has created much uncertainty across the neighbourhood planning community.

Many observers (including planning lawyers and barristers) have concluded that in future neighbourhood plans will have no role in site allocations or in development management, with their scope and influence limited to design codes.

We would prefer to believe that this is not Government's intention and that:

- Neighbourhood plans will continue to have scope to determine site allocations for specific use (housing, employment, social and community) within 'renewal' and 'protected' zones within the principle of 'general conformity' with the Local Plan, and also to influence allocations in 'growth' zones.
- Neighbourhood plans will continue to be able to vary and fine tune the detail of development management policies, set within national, regional or Local Plan policies (again within the limits of 'general conformity').

To illustrate why we believe that neighbourhood plans should continue to have such scope, we provide below some real-life examples of where we feel that the StQW Neighbourhood Plan has helped to facilitate sustainable development in our part of North Kensington:

- The neighbourhood plan introduced policies to vary what local residents considered to be over-restrictive Local Plan policies in a small Employment Zone within our area. By allowing residential use in the airspace above a row of fourteen 1980s light industrial units, the NP allocated a previously unidentified housing site for 50-80 new homes in a Borough with challenging housing targets.
- With slightly more flexible policies (as compared to the Local Plan) on rear dormers/loftrooms, rear elevations, and alterations to roof ridges the neighbourhood plan has allowed for minor alternations to the area's streets of the Edwardian/Victorian terraced houses, without causing harm to conservation features which the neighbourhood forum resolutely defends. These adjustment to LPA policies have allowed for 120 year old houses to remain fully used by today's occupiers, and with improved energy efficiency.

We do not see how this level of fine-tuning of development management policies could possibly be achieved through generic national polices. Nor do we think it makes sense to deny the ability of Local Plans to control development management through bespoke policies and via individual planning applications. We believe this same level of oversight is needed for new development also, in a very high density inner city area.

**Q13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?**

Making available (for free) mapping software and online consultation tools to neighbourhood forums and parish council would be helpful. Achieving effective means of *reflecting community preferences about design* is a much harder challenge.

Our neighbourhood forum has been working with the Borough since July 2020 on preparing a design code for new development in the street in an Employment Zone referred to above. After several years in which a neighbourhood plan policy has permitted residential use above existing employment floorspace, several development proposals have come forward.

Work on this design code involves urban planners for the local authority, the neighbourhood forum, building owners, and a newly formed group of over 100 residents in the street. Unsurprisingly the local authority and building owners/developers wish to maximise the scope for new housing units. The majority of existing residents in the street wish to see minimum increases to the heights of existing light industrial units.

The neighbourhood plan defines what the Forum considers to be carefully calibrated policies to allow what the White Paper might define as 'gentle intensification'. This is a street that would lie within what both the LPA and the Forum view as a 'renewal zone' under the White Paper proposals.

In such a scenario, whose view prevails at the end of the day? Already the work on a design code has proved intensive and time-consuming for all parties. CGI imaging and digital tools to illustrate alternative development options are being used. There is no lack of 'engagement' by local people. This is one of very few streets in London already covered by street-specific planning parameters in a 'made' neighbourhood plan, and we hope that these NP policies will provide a route to consensus. Design codes as a sole or primary basis for community-led planning will prove a false promise to local people, if the LPA is to decide the outcome. To make all such codes the subject of a local referendum (as for a NP) would bring legitimacy, but carries high costs.

## **Conclusions**

Hence we argue that Government needs to be honest and realistic about the merits of a new planning system that appears to rely heavily on design codes and 'pattern books' as the primary (if not the sole) route for involvement and participation by the public.

The gulf between what the public see as acceptable or even 'beautiful' buildings and places in which to live and work, and what is delivered via the current development industry and planning system, is wide. Distrust and cynicism about the workings of developers is deep.

While we support efforts to 'simplify' the planning system, simply removing processes through which LPAs and their elected councillors can shape and control development in their area cannot be the basis for a successful set of reforms.

The public will continue to want to be involved at all stages of plan-making, from the determination of 'zones' and major site allocations through to the details of a neighbour's extension.

Reforms of the Local Plan system which will speed up plan-making and remove some those features which can lead to legalistic obstruction and delay is a worthwhile aim of the White Paper.

The neighbourhood planning framework is one of very few Big Society, devolutionary, and 'localist' measures that has not only survived but extended its geographic coverage over the last decade. That it has done so is a tribute to the thousands of hours that unpaid volunteers have contributed. To now reduce the remit of this part of the English planning system would be a serious backward step. To make neighbourhood planning simpler and more accessible to local communities in major cities, as well as in parished areas, would be a step forward.