

LOCAL PLAN ISSUES AND OPTIONS – RESPONSE FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM AND ST HELENS RESIDENTS ASSOCIATION

The StQW Neighbourhood area was designated by RBKC in 2013 and covers parts of the St Helens ward and Dalgarno ward in the north-west corner of the Borough. The StQW Neighbourhood Plan was successful at referendum in 2016 and was adopted by the Council as part of the development plan in 2018.

The 2019 RBKC Local Plan explicitly recognises the policies in the neighbourhood plan and notes where these vary from Borough-wide policies. We trust that the same approach will apply to the new Local Plan.

Our response below takes account of these existing differences between current Local Plan policies and policies applying to the StQW neighbourhood. We also comment on proposals in the NLPR for new policies or changes to existing policies at borough-wide level. Text in italics is that from the Council's NPLR document, included to make this response more comprehensible to all our members.

We have not attempted to answer all questions in the NPLR document and have focused on the first few overview questions along with those most relevant to our neighbourhood.

SECTION 1: INTRODUCTION

Overall Vision for the New Local Plan

The Planning Acts require each local planning authority to identify the strategic priorities for the development and use of land in its area. We intend to do this through the New Local Plan Review (NLPR), with an ambitious and succinct overall vision that reflects our ambitions and our priorities for future development.

This vision must be guided by and reflect the priorities identified in the Council Plan following extensive public engagement. We have reflected on these suggestions. In particular that we will need to:

- narrow the inequality which exists across the Borough, and ensure that we provide the truly affordable homes¹, employment opportunities and the social facilities needed by all our residents;*
- put green issues and the environment at the heart of all new development, so we can support the health and wellbeing of our residents, now and long into the future;*
- further enhance the Borough's outstanding townscape, by ensuring that the design of new development is of the highest quality and provide support for our existing cultural offer and internationally recognised town centres and their shops, theatres, museums, events, festivals and markets.*

Q1.1: What do you think should be included in the New Local Plan's vision?

COMMENT

We support these three aims but feel that they leave some gaps. The majority of planning decisions by the Council are in relation to small-scale refurbishment or alterations to existing buildings (homes and commercial) rather than 'new development'.

Firstly, as buildings are adapted to meet the challenging demands of a zero carbon ambition, inevitable conflicts will arise over 'conserving' existing building fabric while achieving other 'green/blue' standards, and/or reducing embedded carbon in the choice of materials. We think that the NLPR is not sufficiently clear where weight will lie in balancing these competing priorities.

In bullet 3 the term 'outstanding townscape' does not sufficiently capture the quality of 'place' that is a feature of many parts of the Borough. This quality is a combination of many features, flowing from the development over the centuries of recognisable neighbourhoods of differing and distinctive characteristics.

The terms 'villages' and 'walkable neighbourhoods' within a global city can be overused. But the impact of Covid 19 has reinforced the way in which residents have relied more on their very local environment and on a combination of shops and facilities within easy walking distance, along with parks and green spaces for 'lockdown exercise'.

In the third bullet, 'outstanding townscape' feels too narrow a term to capture the quality of places and neighbourhoods, and one that will have little resonance in the north of the Borough. Some wording that captures the value of coherent, identifiable mixed use areas with a 'neighbourly' feel, set within a large global city, could perhaps be woven into the 'vision' for the Borough.

SECTION 2: KEY CONCEPTS

Section 2 of the Issues and Options paper sets out four key concepts that should underpin the NLPR and run as a common theme across what we are trying to achieve. These are:

- *An Inclusive Borough*
- *Connected Borough*
- *Green Borough*
- *A Beautiful Borough*

Q2.1: Please give us your views on the key concepts, should there be any others?

COMMENT

The language of an '**inclusive**' borough and of 'narrowing the gap' (as a theme in the Council Plan) cannot alter the reality that RBKC is an extreme example of a 'rich/poor' area within a city. And where the Gini coefficient (a measure of levels of inequality of income and wealth) is going up rather than down.

RBKC has committed to using housing and planning policies to attempt to 'narrow the gap'. The New Homes programme is beginning to show results on the ground in the northern wards of the Borough, albeit with modest numbers of genuinely affordable housing units.

We have concerns that making claims in a new Local Plan about an 'inclusive' borough may be greeted with cynicism by some sections of the community. The life prospects of most residents will not be changed by a set of planning policies – except perhaps for the

worse should the Council find itself creating new homes at densities and with building typologies that offer poor quality of life.

On the concept of a **connected borough** we ask for more recognition that the northern part of the Borough still has poor levels of access to the Overground and Underground networks. Plans for a Crossrail station at Kensal/Portobello North are now acknowledged as off the agenda for the foreseeable future. The same applies to proposals for an Overground station at Hythe Road in the OPDC area. Adding buses on already congested roads is not a solution.

Hence the statement in the current NLPR document that *The Borough's central location and the quality of our streets enable it to be very well connected for walking, cycling, e-scooters and public transport* does not ring true for the StQW neighbourhood.

We do not see other European cities planning and building large swathes of new housing (potential development capacity of 5,000 suggested for Kensal Canalside) without first installing the required public transport infrastructure.

On a **'green borough'** we welcome the aim in a new Local Plan of the borough becoming carbon-neutral by 2040. But it will prove hard to wean residents in the StQW era away from car use, with no improvements to the public transport network. Increased use of electric vehicles we see as only a gradual change.

There is a growing body of evidence (Pomponi report and others) that tall buildings are much less sustainable than high-density low-rise development taking account of the full life-cycle greenhouse gas emissions¹. Yet RBKC is allowing developers at Kensal Canalside to come forward with applications for a series of 35 storey residential towers.

As is widely recognised, meeting the challenges of climate change requires multiple incremental changes in citizen behaviour. Local authorities have a major role to play in achieving such change, through regulation and enforcement where necessary. But all layers of government in the UK in recent years have proved disappointingly unable to match the 'civic behaviours' of citizens in other global cities.

The pandemic has exposed these shortcomings. London's public are required to wear masks on public transport, not ride e-scooters and cycles on the pavement, dispose of their waste responsibly, and are strongly encouraged to get vaccinated. But compared with our European neighbours such observance of 'civic behaviour' in the interests of others is weak in the Borough and elsewhere in London. Double vaccination levels in RBKC are still barely above the halfway mark.

While it may be hard for a Local Plan and a 'Greening SPD' to do much to change public behaviours, we suggest that this challenge will need to be confronted more explicitly in to achieve a carbon-neutral borough. And backed up with more examples of enforcement. Our experience as a neighbourhood forum is that a culture of *'rules do not apply to me or us'* has become increasingly pervasive. Despite frequent reminders in our newsletters, we are not succeeding in deterring house owners from installing impermeable surfaces in front gardens. So what hope for combatting the impact of climate change on all other fronts?

¹ Decoupling density from tallness in analysing the life cycle greenhouse gas emissions of cities

<https://www.nature.com/articles/s42949-021-00034->

[w?utm_medium=affiliate&utm_source=commission_junction&utm_campaign=3_nsn6445_deeplink_PID100041175&utm_content=deeplink](https://www.nature.com/articles/s42949-021-00034-w?utm_medium=affiliate&utm_source=commission_junction&utm_campaign=3_nsn6445_deeplink_PID100041175&utm_content=deeplink)

On a **beautiful borough**, we support the Government's efforts at national level to follow up the work of the Building Better, Building Beautiful Commission in the form of the new National Model Design Code and Office of Place. But in terms of new developments, we see little or no change in the workings of the London development market, nor in the ability of London planning authorities to take a robust view on what constitutes 'exemplary architecture'.

SECTION 3: PLACES

The current Local Plan identifies eleven 'Places' or areas which would benefit from local visions to help shape their nature in the future. The Issues and Options paper groups these places into two broad categories,

- *Areas that can accommodate growth*
- *Areas with a particular national or international reputation*

The Places are set out in the maps and table is Section 3 of the Issue and Options paper. These include a precis of the existing visions for these areas. The full visions can be viewed at the relevant place chapter within the current Local Plan.

COMMENT

In commenting on the value of 'Place' chapters in a Local Plan, we understand that these will be much shortened in a new version. This seems sensible. The existing set does not cover all the Borough, and the 'vision' description for each 'Place' is often arguable. It remains open for any residents association or amenity body to apply for area designation and to prepare a neighbourhood plan as part of the statutory development plan, as has been the case for the Norland and StQW areas.

In the NLPR document, **Latimer Road** is identified as the third in a set of five 'areas of change'. Within these five areas a total of 10 site allocations is shown.

We have discussed within our management committee the appropriateness of Latimer Road being picked out in this way. The area is a single street, and not at all comparable to areas of change such as the Opportunity Areas at Earls Court and Kensal Canalside. The extent to which Government will introduce a 'zoning' system as floated in the 2020 White paper remains unknown at this time,

On balance we have no problem at present with Latimer Road appearing in this way, but will take account of views from residents in the street and our wider membership when responding to the next iteration of the Local Plan.

As a site allocation for a potential 75 new homes (over time, and above redeveloped light industrial/warehouse buildings at Units 1-14 Latimer Road) this allocation is already built into the StQW Neighbourhood Plan and the 2019 RBKC Local Plan.

There is risk of some public confusion with the Latimer 'Place' identified as Grenfell and its surroundings as a separate 'Place' for which an extensive process of planning co-design with the local community is in progress.

The pace at which any redevelopment proposals for Units 1-14 Latimer Road. are coming forward has proved to be slow. The mixed use development at Unit 1 is nearing completion. Market interest in warehouse premises from 'e-fulfilment' businesses has raise rental levels. The building are in different ownerships.

Latimer Road Units 1-14 also appears in a list at Figure 3.1 headed Places with a particular national or international reputation. This must be an error, as Latimer Road in no way meets this description

The wording in the NPLR mini-vision for Latimer Road is an assumption which may or may not happen, and in need of rephrasing (it currently reads The Latimer Road Employment Zone will become a hub for new creative industries. Units 1-14 will be optimised to provide new homes and modern workspaces on the ground floors and mezzanine. This will catalyse public realm improvements to make the area safer and more inviting). In the five years since the StQW policies came into force, allowing mixed use redevelopment of Units 1-14 and a wider range of uses at the southern end of the street, interest from building owners or potential developers has been limited.

We comment further on Local Plan policies for Latimer Road under Section 9 below on Business and Culture. Latimer Road is already shared between an Employment Zone and a Conservation area. It also has a design code for part of it, and is covered by a Neighbourhood Plan and the Local Plan. If it is now also being proposed as a 'place' with a special role for creatives, a comparatively short length of street will contain five special designations, sets of rules etc, which is surely absurd.

On proposals for **Kensal Canalside**, our Forum has been tracking since 2013 the emergence of planning policies and site allocations for this Opportunity Area. We submitted detailed comments on the Draft Supplementary Planning Document (now adopted). We have attended consultation sessions with developers Sainsburys/Ballymore and St William, and continue to meet with them in the final stages of their preparation of planning applications.

As set out in our response to the SPD

- The 2013 RBKC Issues and Options exercise in 2013 set out three options for the regeneration of the area, with the highest density option delivering 3,500 new homes
- This remains as an 'indicative' figure in the 2021 London Plan, with the term 'indicative' defined as requiring testing through masterplanning of the site.
- The 2021 RBKC now refers to development capacity above this figure being supported, up to 5,000 housing units.
- No justification for this change has been explained, other than that RBKC has failed to meet its housing trajectory for several years and is now subject to the 'tilted balance' that favours developer aspirations should applications be refused and appealed.
- The 2013 options assumed a new Crossrail station at Kensal Canalside and hence much improved access to public transport - making high densities more acceptable. Plans for such station are now off the agenda.

We will therefore be opposing strongly the imminent applications at Kensal Canalside. These proposals do not reflect the aspirations for 'green' and 'well connected' places as envisaged in NPLR and, if built out, will (in our view) prove to be an unsuccessful and unsustainable example of large-scale urban renewal likely to haunt the Council for decades to come.

Q3.3: The Council will look again at the existing visions for these Places and consider whether they remain appropriate. Do you have any views on the shortened visions for the Places as drafted in the table above? Is there anything else we should include?

COMMENT

As explained above, the mini-vision for Latimer Road overplays the potential for change in this street, where existing light industrial/warehouse units are in multiple ownerships and redevelopment potential remains marginal – for residential as well as commercial floorspace.

4. A Zonal Planning System**Government's White Paper proposals**

4.1 The Queen's Speech in May 2021 outlined the Government's intention to bring forth a Planning Bill in the coming Parliamentary term. However, the Speech did not reveal more details following the Government's White Paper proposals of August 2020. A zonal planning system in the future with changing local plans so they "provide more certainty over the type, scale and design of development permitted on different categories of land" remains on the cards. It is understood that the Government received over 40,000 responses to the Planning White Paper and is considering those responses. In the absence of more detail, we have provided a summary of the White Paper proposals as these will affect the production of the NLPR in due course.

4.2 The White Paper proposes that Local Plans should identify land under three categories: 1) Growth areas suitable for substantial development; 2) Renewal Areas suitable for development; and 3) areas that are protected. Figure 2.3 provides an indicative illustration of where these areas may be across the Borough.

- **Growth Areas** – the Government will define the term 'substantial', and the White Paper indicates that this is land suitable for complete redevelopment. We have two such areas in the Borough currently classed as "Opportunity Areas" – Kensal Canalside and Earl's Court. Sites annotated under this category in the Local Plan will automatically have outline approval.
- **Renewal Areas** – these cover existing built areas where smaller scale development is appropriate. It could include gentle densification and infill of residential areas and development in town centres. There would be a statutory presumption in favour of granting permission for uses specified as being suitable in each area.
- **Areas that are Protected** – These include conservation areas which cover about three-quarters of the Borough.

COMMENT:

We provided input to the Kensington Society response to the 2020 White Paper *Planning for the Future* and to the Government's proposals at that time to introduce the concept of planning zones. Until the Government reveals the content of a Planning Bill, we suggest that the Borough 'zoning' map at Section 4 is not used in future RBKC publications on the Draft Local Plan.

SECTION 5: LOCATIONS FOR FUTURE DEVELOPMENT. 'A CALL FOR SITES'

As a central and highly built-up area, with extraordinarily high land values, Kensington and Chelsea has very little space that is free for development. Most land that has not been built on is strongly protected for either its historic or landscape value. However, we would be

interested to hear of any additional sites which may be suitable for new development, and which may have the potential to contribute to the Borough's future needs.

In the responses to the Borough Issues paper consultation, 13 sites were suggested as suitable for new development. The proposed sites have gone through the first stage of the sifting process to assess their suitability for being designated as new site allocations.

Q5.1: 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 and medical uses.*

COMMENTS

The sites allocated for new housing in the StQW Neighbourhood Plan are already included in the NLPR. These are 142a Highlever Road (Highlever Garage), airspace above Units 1-14 Latimer Road, and 3-5 Crowthorne Road. A mixed use scheme for the latter was granted planning consent in 2015 but not subsequently implemented. This suggests that financial viability for either residential or office/commercial development in the StQW neighbourhood remains marginal.

The Council owns Unit 12 Latimer Road and hence has the opportunity to include this site in its New Homes Programme and to deliver an exemplar redevelopment that meets the new Design Code for Units 1-14.

Q5.2: How do you feel about the sites that were identified in the first round of call for sites? Do you find them suitable for development? Do you agree with their current categorisation?

See above

SECTION 6: BLUE-GREEN FUTURE

Issue 1: Climate change and building design

The Local Plan will be one of the key documents in achieving the Council's target to be a carbon neutral borough by 2040. It can set out how we expect the energy efficiency of both new and existing buildings will be improved.

A series of options for policy approaches towards the reduction of toxic emissions are set out under Issue 1 of Section 6 of the Issues and Options paper.

Q6.1: Which of these options do you support? You can pick more than one.

COMMENT

The diagram at page 41 is helpful in giving a brief explanation of the terms 'zero and net zero carbon', the 'circular economy' and 'whole life carbon footprint'. But it must be recognised that this language, when used in the context, of spatial plans is only gradually becoming comprehensible to the public.

The way in which the options on Issue 1 are presented is heavy on jargon and we find these difficult to understand and comment on.

The image at 6.5 and 'Q2' showing poll results on prioritisation of potentially conflicting demands is confusing? What are the small figures shown? These seem to conflict with the highest/lowest scores?

On **option 1** there would seem to be sense in combining the various existing requirements for applications to be accompanied by energy statements, flood prevention statements into a single composite climate change statement. But unless there are sufficient staff with expertise to assess these, and some form of monitoring and follow up, there are high risks of simply adding to documentation sought from and provided by a myriad of consultants, to no substantive effect.

Whole Life Cycle Carbon

A whole life cycle approach must surely make sense, but may well not be in the interests of commercial developers who have little or no financial interest in the long term performance of what they build.

Energy hierarchy – Be Lean:

Option 1 seems an obvious starting point. We do not have the technical knowledge to distinguish between or comment on Options 2 and 3. Overheating of extensively glazed residential towers seems an obvious example of where developers design buildings on the basis of marketing considerations, with significant long-term costs to users in subsequently paying for energy consumption on cooling measures that were not needed in the first place, given adequate design,

Issue 2: Air Quality

In this borough, we remain concerned about concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}), and the whole borough has been declared an Air Quality Management Area (AQMA).

We must reduce emissions of nitrogen dioxide and particulate matter as well as addressing the negative effect of climate change in order to become more resilient. A series of options for how we can control air pollution through the New Local Plan are set out under Issue 2 of Section 6 of the Issues and Options paper.

Q6.3: Which of these options do you support? You can pick more than one.

COMMENT

We concur with the poll results shown, giving Air Quality the highest priority of current environmental issues facing local residents. As a result of actions by the Mayor of London,

improvements are being made. This is an example of where public behaviours are being changed, through the introduction of financial penalties on ownership of older vehicles.

The NLPR document does not explain the practical implications of the Borough being an Air Quality Management Zone? Does this give the Council increased powers of enforcement?

Options 1, 2 and 3 all seem to make sense,

Q6.4: Do you have any other options to suggest?

COMMENT

We support the views of the Kensington Society on stronger controls on construction traffic. At present the financial disincentives to a property owner undertaking e.g. a basement project are very limited. No compensation to neighbours is required for a year of noise and nuisance. Some minor costs are incurred on suspension of parking bays. Would a local authority have powers to levy a 'construction traffic charge' on individual projects based on the content of a CTMP, i.e. number and nature of HGV journeys?

Issue 3: Noise and vibration

Pollution also comes in the form of noise and vibration which can seriously affect the amenity of residents and visitors both during the construction and operation of new development. The Council is committed to protect residents' amenity and quality of life from development where noise and or vibration is generated.

A series of options for how we can control noise and vibration in the Borough are set out under Issue 3 of Section 6 of the Issues and Options paper.

Q6.5: Which of these options do you support? You can pick more than one.

COMMENTS

The Code of Construction Practice has been of some help. But the major (and seemingly permanent) shift to increased working from home has increased the need for stronger measures to control or limit noise from construction.

An alternative option would be to create financial costs and disincentives to projects that involving high and continuous noise levels over a long period of time, basements being an obvious example. Is there scope within the CIL regime for applying an additional levy to this form of development?

Option 1: Agree,

Option 2: Agree.

Option 3: We do not understand what is said about the specific noise impact of gyms and fitness centres? What about recording studios, late night venues, restaurants, bars? Noise nuisance from 'e-fulfilment' and delivery firms using scooters and motorbikes is a growing issue even if some of these businesses use electric bikes and scooters. Why special measures for gyms only?

Option 4: Agree. The growing use of 'dark kitchens' in warehouse premises or premises with no ventilation systems is a new issue. Lack of an 'odour policy is a gap in the Council's armoury. Light pollution, from commercial buildings leaving lights on all night and from domestic security lighting is also a subject on which policies need strengthening.

Issue 4: Flood risk

There is no doubt that increasing global temperatures will lead to more intense rainfall and severe weather. Therefore, we need to plan for more surface water (rain) and sewer water flooding, the main types of flooding that we expect across our borough.

A series of options for addressing flooding and flood risk in the Borough are set out under Issue 4 of Section 6 of the Issues and Options paper.

Q6.7: Which of these options do you support? You can pick more than one.

COMMENTS

We await the independent report by Thames Water on the causes of the flash flooding in the north of the Borough on July 12th 2021. As we have raised in the past, we question whether RBKC should continue to grant planning consents to basements within Critical Drainage Areas until such time as TW can provide assurances that its systems can cope with what are no longer 1 in a 100 year events. We anticipate that the insurance industry will react to such weather events by making basements almost uninsurable in commercial and domestic properties at risk of flash flooding.

Option 1: As we understand, 'breach level' relates to risks of fluvial flooding should e.g. the Thames Barrier fail? Flash flooding from excessive rainfall appears to be a much more likely risk in the StQW neighbourhood.

More resilient design of basements could be ensured through planning requirements and Building Regulations. Restrictions on use of basements as sleeping accommodation should be introduced, in Critical Drainage Areas, through planning conditions and legal agreements, except where adequate preventative measures are in place.

We support Options 2, 4, 6 and 8. On Policy CE2 and resisting impermeable surfaces we need more help from RBKC in enforcing breaches that are reported. Plus clarity over whether this policy applies to rear as well as front gardens. The new demand for 'garden offices' to enable 'working from home' is an issue, and PD rights means that permeable areas in rear gardens are increasingly at threat. The efficacy of green roofs on outbuildings, as a substitute for garden area seems questionable.

Given that the Thames Water report is being commissioned by TW, can it really be said to be independent?

Issue 5: Biodiversity

A new Environmental Bill is expected to become an Act of Parliament (law) later this year, which will introduce a requirement for all developments to provide a biodiversity net gain.

A set of options for policy approach to biodiversity in the Borough are set out under Issue 5 of Section 6 of the Issues and Options paper.

Q6.9: Which of these options do you support? You can pick more than one.

COMMENT

We support Option 1 and are not clear on Option 2. This refers to all sites for major and minor applications but then refers to 'developers' needing to meet a new requirement?

Issue 6: Green Infrastructure

Green infrastructure can be found in cities in the form of parks of different sizes, front and rear gardens, grassed areas, street trees, allotments, hedges, green roofs and green walls. It can have lots of benefits including reducing pollution, enhancing biodiversity, reducing the risk of flooding and as a space of children. The NLPR will build on the benefits of green infrastructure and ensure a holistic approach to increase not only the greening cover in the Borough but also its quality.

A set of options for policy approaches to green infrastructure in the Borough are set out under Issue 6 of Section 6 of the Issues and Options paper.

Q6.11: Which of these options do you support? You can pick more than one.

COMMENT

We support Option 1 as per the London Plan. Options 2 and 3 are supported in relation to major developments, but are too onerous for household applications.

SECTION 7: HOMES

Issue 1: Delivering the homes that we need

Every Council in the country needs to have a housing target and is required by the Government to deliver this. Our housing target is set through the London Plan 2021 and is 448 homes per annum. We need to plan proactively, and make sure that each site optimises its potential if we are to deliver it. However, it is also essential that we do not compromise on the quality of new developments.

A set of options for how we support the delivery of new housing in the Borough are set out under Issue 1 of Section 7 of the Issues and Options paper

COMMENT

On Housing Targets, we support the response from the Kensington Society. Such targets become meaningless when they are undeliverable in reality.

We await the results of the 2021 Census and do not understand why it takes a year to publish headline figures for London's population, in-migration and out-migration. The position on London's 'housing need' may prove to be very different from pre Brexit and pre-Covid GLA projections.

Q7.1: Which of these options do you support? You can pick more than one.

COMMENT

Option 1: We are not happy with the use of the terms 'optimise' and 'maximise' in terms of the use of housing sites. Sites should be built out at density levels which will prove sustainable and successful over the long term, and which conform with typologies in the National Model Design Code. RBKC has a good track record of building at such densities, but appears now to be willing to accept what have long been accepted as 'superdensities' and 'hyperdensities' at locations with poor public transport access.

Option 2: We prefer this option, which should help to limit 'prime' market interest in large flats and apartments, which reduce scope for units more affordable to a wider range of households..

Q7.2: Do you have any other options to suggest?

COMMENT

We support the detailed comments of the Kensington Society. This chapter in the next iteration of the Local plan will have a crucial impact in defining the future of the Borough.

We share the Society's misgivings about a Characterisation Study which (in its initial version) is a fairly superficial exercise.

We support the Society's encouragement for the Council to adopt a Plan B approach, based on the London Plan housing target of 448 housing units per year, with an emphasis on high-density medium-rise development which would relate to the traditional townscape and would be sufficiently dense to support local neighbourhood centres and the range of services and infrastructure to support walkable neighbourhoods.

Issue 2: Protecting existing homes

The loss of existing homes makes it more difficult for us to meet our housing target. One of the main ways we lose homes is when a number of smaller flats are amalgamated to create a single larger unit.

A series of options for how we can protect existing homes through the New Local Plan are set out under Issue 2 of Section 7 of the Issues and Options paper.

Q7.3: Which of these options do you support? You can pick more than one.

We support all three options.

Limiting amalgamations to two units into one will be of some help in reducing the rate of losses of units.

Issue 3: RBKC Community Housing

The Council adopted a new planning document entitled RBKC Community Housing in June 2020. 'Community Housing' is the term we use to describe genuinely affordable housing in the Borough. Within this term we prefer three housing products that we consider to be

genuinely affordable – social rent; London affordable rent and intermediate rents set at London Living Rents at the lowest ward level (currently Notting Dale).

Our current policy requires at least 35 per cent affordable housing on residential development that is 650 sq. m or more. However, national policy says we should be requiring this only where 10 homes are being created or there is a floorspace of 1,000 sq. m. In addition, the Government has introduced a new requirement that 25 per cent of the affordable housing provision should be First Homes ([Planning Practice Guidance NPPG: First Homes](#)).

A set of options for policy approaches to affordable housing are set out under Issue 3 of Section 7 of the Issues and Options paper.

Q7.5: Which of these options do you support? You can pick more than one.

General

We welcome the fact that the New Homes Programme is providing new homes on infill sites in an around the StQW area and consider the level of consultation with the public on these schemes to have generally been good.

Options for when community housing is triggered

Based on our experience in trying encourage development of new housing in Latimer we support Option 3 and conforming with national policy on this trigger point. Realistically, developments which trigger a requirement for a single affordable unit are always going to struggle to find a RSL willing to take on the management role. The 650 sq m trigger is a significant obstacle to viability of redevelopment on smaller and medium-sized sites. There should at least be scope for applying the higher national figure on a selective basis, where the location and planning context make this necessary for developability and deliverability of new housing. If anything is to happen in Latimer Road, we think that it will need the higher national figure of 1,000 sq m as a trigger level.

Option 2: We oppose Option 2 of a reduced 500 sqm trigger.

Options for percentage of Community Housing:

We support the Kensington Society comments on these options.

Issue 4: Housing for older people

Our existing Local Plan policy provides support for all types of older people's housing. However, to be more effective the policy needs to be revised to be finer grained and reflect the future need for the various types of specialist older people's housing in the Borough. This includes an understanding of the need that can be fulfilled by private provision and that which needs to be genuinely affordable.

A set of options for policy approaches to older people's housing in the Borough are set out under Issue 4 of Section 7 of the Issues and Options paper.

Q7.7: Which of these options do you support? You can pick more than one.

COMMENT

We support greater emphasis on providing more affordable older persons' housing options, including within extra-care housing.

Option 1: We support a higher proportion of older persons' housing being built to a higher standard of accessibility.

Option 2: We support a stronger emphasis on housing provision for older persons, but with more emphasis on incorporating affordable units.

Option 3: We support the provision of affordable extra-care housing

Option 4: We prefer option 3, as the main shortage in the extra-care housing sector in this Borough is for affordable extra-care housing.

Issue 5: Other housing products

The Borough's residents may benefit from a range of different types of housing, including Build to Rent Homes, shared living, co-living or houses in multiple occupation.

A set of options for policy approaches to other housing products in the Borough through the New Local Plan are set out under Issue 5 of Section 7 of the Issues and Options paper.

Q7.9: Which of these options do you support? You can pick more than one.

Options for build to rent:

We are seeing growth locally of the Build to Rent business model where the developer is also the long-term landlord and manager, in the Scrubs Lane and North Acton parts of the OPDC area. We think that this model risks drawing in potential tenants at seemingly acceptable initial rents, coupled with 'extras' of bars, gyms and leisure facilities, with rents and service charges then escalating to unaffordable levels within a few years.

Other forms of housing

Option 1: The co-living model has seen reduced popularity during the pandemic, with lockdowns preventing use of communal areas. The company which launched the Collective (702 co-living units in Old Oak Lane) has gone into administration.

We think there is scope for exploring multi-generational models of co-living for those of the older generation looking for opportunities to downsize.

Option 2: The StQW Neighbourhood Plan suggested Latimer Road as a potential housing site where small scale housing co-operatives could bring forward self-build and custom-build projects on a model scale. There was a time in the late 1970s when RBKC actively promoted such schemes, providing 100% mortgages and long leases, as a means of enabling younger professionals to find housing in the Borough,

SECTION 8: TOWN CENTRES

Issue 1: Covid-19 recovery and maintaining the vitality of our centres

Town Centre First

The NPPF and the London Plan require a “town centre first approach” and a “sequential test” for any new town centre use. This means that councils are expected to direct new shops and other commercial town centre uses to existing centres. These principles have served the Council well and we intend to take these principles forward into our new Local Plan. However, the NLPR is an opportunity to revisit some of the details around these tests, and to consider whether we need to change our current approach.

Options for policy approaches to town centres are set out in Issue 1 of Section 8 of the Issues and Options paper, under Town Centre First.

Q8.1: These options are not mutually exclusive. Do you support these options?

General comment

Finalised policies in a new Local Plan will need to take account of what have been major shifts in the world of work, the use of office premises, and e-retailing and delivery. It remains early days to establish how far all of these will return to the patterns that pre-dated the pandemic. Future reliance on former '*principles for centres that have served the Council well*' seems premature. A new Local Plan will need to be creative in defining policies that prove flexible enough to deal with differing scenarios of city life.

As per our earlier comments, the Borough's neighbourhoods – with residential streets surrounding a cluster of shops and other facilities within easy walking distance – have become more essential to the daily lives since the start of the pandemic. This is a strength that can be built on.

Option 1: We support policies which will help to ensure the survival of smaller shops and other businesses in neighbourhood centres. The StQW Neighbourhood Plan introduced flexible policies on change of use between the former A, B, and D classes uses in our three neighbourhood centres. The new E class continues this flexibility. Vacancy levels in shop units, especially in North Pole Road, have reduced since five years ago despite the pandemic.

Option 2: We see no evidence that the north-west corner of the Borough is in need of 'new office floorspace'. We have a longstanding problem of hard-to-let office floorspace in Latimer Road. Working from home was, for many professionals in this part of North Kensington, already a way of life long before lockdown. The RBKC evidence base on office floorspace, and concerns over loss offices, has never included data on working from home as this is hard to capture.

We are not persuaded by the NLPR assertion that *Offices make a particular contribution to our Employment Zones or to other areas outside of our town centres* (see more below). This is a subject on which we think a new Local Plan needs a more fundamental rethink.

Mix of Uses in our Centres

Recent changes to planning regulations means that planning permission is no longer required for one “commercial, business or service” use to change to another. The NLPR

must reflect these changes and can no longer have detailed frontage policies which set out the proportion of shops that we can expect in different parts of our town centres.

Options for policy approaches to deliver a mix of uses in our centres are set out in Issue 1 of Section 8 of the Issues and Options paper, under Mix of Uses in our Centres.

Q8.3: Which of these options do you support? You can pick more than one.

COMMENT

We see Options 1 and 2 as reflecting what we see as a familiar desire of the planning profession to exert maximum control over building uses. Yet this is a moment when 18 months of fundamental change to city life suggests caution on overly detailed or prescriptive planning policies for town centres and offices.

We therefore lean towards **Option 3**, at least for the next few years. The impact of allowing greater flexibility in uses and activities within neighbourhood centres and the smaller ‘town centres’ within the Borough (such as Notting Hill Gate) should at least be tested in the real world.

In a part of the Borough now threatened with extreme housing densities and building heights, as a consequence of a lack of developable housing sites, we support the Government’s moves *to support mixed and flexible high streets* through more limited restriction on change of use.

We would want protections on social, community and cultural uses to be retained. But this seems a time in the history of global cities when classifications such as ‘shop’ or ‘office’ have a diminished meaning and relevance. Very different demands and uses may emerge, which make sense to the public, but which may clash with the orthodoxy of the planning profession.

Hence we think that a new RBKC Local Plan needs to be alive to such possibilities and avoid assumptions by the Planning Department that what has ‘*worked well for the Council*’ in the past is what residents wish to see in the future.

Residential uses within our centres

A recent change to planning regulations means that a Council can only consider a narrow suite of issues when deciding whether most town centre uses can be used for housing. We intend to make what is known as an “Article 4 direction” to ensure that planning permission will continue to be required. However, this is a long process, which cannot be confirmed until at least August 2022.

Q8.5: Do you support us making an Article 4 direction to ensure that planning permission will continue to be required for changes of use of commercial, business and service uses to residential? If so, should the direction cover all of our town centres?

We have submitted separate representations on the Council’s proposals for extending a Borough-wide Article 4 Direction. For the specific StQW neighbourhood, we do not see such a Direction as helpful and have opposed its introduction in relation to this part of the Borough. We acknowledge that the Kensington Society, looking at much wider area, takes a different view.

Q8.9: Are any areas or parades which should be added to, or removed from an existing centre? Please be specific and explain why.

We support the designations of St Helens Gardens, North Pole Road, and Barlby Road as the three neighbour 'shopping parades' in the StQW area. We welcome the planned investment by the Council in streetscape improvements in St Helens Gardens.

SECTION 9: BUSINESS AND CULTURE

Issue 1: The provision of offices

The Council values offices as a use which can support the local and the wider economy. In a borough such as ours, where residential property values are generally significantly higher than any other, new offices rarely come forward unbidden. To meet our need for new office floorspace we try to stop the loss of any existing offices; and encourage the provision of new offices in appropriate locations.

This approach has proved successful however, it is now timely to consider whether this approach is still appropriate. Options for policy approaches to office space in the Borough are set out under Issue 1 of Section 9 of the Issues and Options paper.

Q9.1: Which of these options do you support? You can pick more than one.

As shown by the map at page 101 of the NLPR document, business premises in the Borough are widely dispersed and mixed in with residential areas – rather than being clustered within a few 'major urban centres'.

This is a characteristic of the Borough which we think will gain in importance in the coming decade but which needs to be responded to with planning policies that operate at a fine local grain. What works well in one neighbourhood will not work in all.

On Option 1, we do not agree that a new Local Plan should *continue to protect all offices*. Office floorspace at locations with poor public transport and few shops or places to eat and drink does not thrive. Levels of vacant office floorspace were high in Latimer Road in 2013 when we embarked on a neighbourhood plan. They are high again now and will increase as leases fall in and the current moratorium on unpaid rents ends.

We therefore **strongly support Option 2** in the NLPR document, which recognises that *There may be areas where offices are now inherently unsuitable for offices*.

Current policies in the StQW Neighbourhood Plan are in line with **Option 4** which states that *Allowing new homes in our Employment Zones, but only when supported by new business development, is one way of meeting our need for new offices*.

We suggest that for the future the Council should go a step further in a new Local Plan. The four separate sections in Latimer Road are part of a combined Freston Road/Latimer Road Employment Zone. This combination of locations ceased to make much sense once the Westway cut off all vehicle connections between these parts of North Kensington. The sections of Latimer Road designated as an EZ date from decisions when this western side of this street was transferred from LBHF to RBKC as a result of a 1996 boundary transfer,

The designation of the three Employment Zones in RBKC (Lots Road, Kensal and Freston/Latimer) dates from 1998 and was consolidated in the Borough's 2002 Unitary Development Plan. This was 30 years ago and London in 2021 is not the same.

In a 2015 submission to the Council we argued that *The StQW Forum considers that Policy CF5 has become increasingly outdated and irrelevant to the future needs of Latimer Road*.

Parts of the policy are restrictive and protectionist, and run counter to the NPPF direction that Local Plans should 'promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas'.

RBKC Policy CL5 was varied in the 2019 Local Plan, and now allows for the possibility of mixed use in EZs when combined with 'a significant uplift in both the quantity and the quality of the business use on the site. This is not a viable way forward for the 1980s office buildings in the street. **We believe that that the Council should de-designate this part of the combined Freston/Latimer Road EZ, in the new Local Plan.** The Freston Road part of the Freston EZ has proved successful at attracting and retaining major businesses. The four EZ sections of Latimer Road (mainly on the west side of the street) have not.

During 2021, and in response to pressure from local residents, the Council has consulted on and agreed proposals for most the eastern side of the street to be added within the boundary of the Oxford Gardens Conservation Area. Having sections of the same street as a conservation area and an employment zone, subject to potentially conflicting policies in different chapters of a new Local Plan, makes even less sense than was the case for the 2019 Local Plan. With the introduction of the much broader E class, trying to protect offices which are just one category in the new use class seems a questionable ambition.

Issue 2: Light industrial uses

The Council promotes the widest range of business uses to ensure that the Borough can benefit from the talents of all those who live here. To this end we have tried to support light industrial uses where we can, and to resist their loss to residential. However, this ambition must be seen in the context of planning regulations which have long allowed one business use to change to another without the need for planning permission.

Options for policy approaches to light industrial uses in the Borough are set out under Issue 2 of Section 9 of the Issues and Options paper.

Q9.3: Which of these options do you support? *You can pick more than one.*

COMMENT

We think that the NLPR sets us a false dichotomy in its Options 1 and 2, when applied to Latimer Road. The StQW Neighbourhood Plan introduced the idea of this street as a good location for cultural businesses and 'makers'. 'Makers' and creatives will find their way to suitable spaces in which to work. StQW Policies LR 1, 2, and 3 provide for continued ground floor space in the street for this to happen (provided that these neighbourhood level policies are acknowledged as part of a new Local Plan). Hence, we do not see a need to choose between these two options..

Issue 3: Affordable workspaces

A Council can require the provision of an affordable workspace when granting planning permission for a large new commercial development. However, it will have a "cost" on the development which may mean that other benefits cannot be provided.

Options for policy approaches to affordable workspaces are set out under Issue 3 of Section 9 of the Issues and Options paper.

Q9.5: Which of these options do you support? *You can pick more than one.*

COMMENT

We support options 1 and 2. Other London Boroughs with lower land values than RBKC have operated successful policies that achieve discounted workspace in major developments. There are examples to draw on – albeit that London may well experience much surplus workspace in the immediate future with rent levels falling to ‘affordable’ levels.

SECTION 10: SOCIAL AND COMMUNITY USES***Issue 1: Types of social and community use***

The current Local Plan identifies five broad categories of social and community use. These are:

- *medical or quasi-medical uses*
- *education uses*
- *sports facilities*
- *uses supporting the emergency sectors*
- *other ‘valued use’*

Options for policy approaches to identifying and defining types of social and community uses in the New Local Plan are set out under Issue 1 of Section 10 of the Issues and Options paper.

Q10.1 to Q.5 : Which of these options do you support?**COMMENT**

We support the response of the Kensington Society including its suggestions on additions to the list of social and community uses offered some planning protection under Policy CK1,

SECTION 11: TRANSPORT***Issue 1: Increasing active travel***

Whilst the private car will always remain important, walking and cycling can improve health and are good for the environment.

The proposed policy approach to supporting and facilitating walking and cycling in the Borough through new development is set out under Issue 1 of Section 11 of the Issues and Option paper.

Q11.1: Do you support this option? You can pick more than one.**COMMENTS**

Issue 1 Option 1 proposes that *New developments that deliver new streets should be laid out so as to preclude motorised through traffic while being fully permeable for active modes of travel.* We do not see how this option is realistic for Kensal Canalside. PTAL levels are poor. Additional bus routes circulating the Opportunity Area will all rely on a

single entrance/exit onto Ladbroke Grove. OPDC proposals for a continuous 'Wormwood Scrubs Street' linking Kensal Canalside to Scrubs lane and Old Oak Lane is one of several pieces of transport infrastructure identified by the Development Corporation as a 20+ year proposition for which no funding has been identified in the OPDC Draft Local Plan.

Issue 2 Traffic Congestion

We support current RBKC policies which do not allow resident permits at new developments. We also support **Option 1** resisting on-site parking in new developments except for Blue Badge holders. On **Option 2** there is an obvious need for consolidated service bays and delivery points at new developments, given the huge increase in e-deliveries (which may or may not be sustained over time).

Issue 3: Pollution

Poor air quality is increasingly one of our residents' main transport-related concerns, and with justification. There are high levels of pollutants, nitrogen dioxide (NO₂), particulates (PM₁₀) and fine particulates (PM_{2.5}) on the Borough's arterial roads.

Electric vehicles are becoming more prevalent and new developments are required under the London Plan to provide on-site charging. Whilst a move to electric vehicles will greatly reduce tailpipe emissions, it will not solve the issue of fine particles generated by braking and tyre wear. Any reductions in pollution that serve to encourage more walking and cycling will be self-reinforcing. These could potentially be achieved by requiring the use of electric vehicles, where it would be reasonable to do so, or securing additional tree planting and green infrastructure.

Options for policy approaches to electric vehicles (EVs) and EV charging infrastructure are set out under Issue 3 of Section 11 of the Issues and Options paper.

Q11.5: Which of these options do you support? You can pick more than one.

COMMENT

Option 2: We support rapid EV charging in major developments with off-street delivery and servicing space.

Q11.6: Do you have any other options to suggest?

COMMENT

The NLPR review document makes several references to electric scooters. We think that a failure by national and London government to legislate, communicate and enforce rules about this new form of permanent transport has created real problems. We wait to see the outcome of the current pilot on the use of 'legitimate' rented scooters in RBKC. At present unlawful use on pavements and irresponsible use on roadways is creating a set of hazards for driver and pedestrians that our members could do without.

Issue 4: Improving access to public transport

Public transport accessibility is generally good in much of the Borough but there are areas in the north west, along parts of the western boundary, along the River Thames and in the south west that are less accessible, particularly in terms of accessibility to the Underground

network. It is important that everyone can travel spontaneously and independently on public transport services.

Options for policy approaches to improving public transport accessibility in the Borough through the Local Plan are set out under Issue 4 of Section 11 of the Issues and Options paper.

Q11.7: Which of these options do you support? You can pick more than one.

COMMENT

Paragraph 11.8 of the NLPR document makes a rather weak reference to the existing Local Plan policy supporting the addition of an Overground station at 'Western Circus' beneath the Westway elevated roundabout (**Option 2**).

There has been no visible sign of TfL accepting the business case for such a station, in the period since it was first promoted by the West London Line Group and the StQW Forum back in 2015/16. Given subsequent decisions that a new Crossrail station at Kensal, and an additional Overground station at Hythe Road in the OPDC agenda are 'off the agenda' it is important that a new RBKC Local Plan reinforces in detail the case for a station at Westway Circus.

The costs of such infrastructure would be far lower than for stations at Old Oak Common Lane and at Hythe Road, consulted on by TfL back in 2018 but not progressed further.

Achieving step-free access at Underground stations is an important aim for a new Local Plan. But the Council needs to recognise that the north west corner of the Borough has seriously inadequate connections to rail, Overground and Underground networks. As noted above, achieving changes in public behaviour and a zero carbon future by 2040 is not going to happen without adequate access to these comparatively sustainable forms of public transport.

SECTION 12: STREETS, PARKS AND OUTDOOR SPACES

Issue 1: Parks and play space

In a built-up area like Kensington and Chelsea the provision of safe and stimulating play facilities are vital for children's' well-being and development.

The proposed policy approach to supporting provision of new parks and play spaces through the Local Plan is set out under Issue 1 of Section 12 of the Issues and Options paper.

The following is taken from the Open Space Policy Review and Audit 2005. It is obviously out of date but these type of figures are what we will look for in the plan:

1.5 In terms of intensity of land use, the Royal Borough has the highest number of residents per hectare of any borough in London at 128.4 people/hectare where the average for the whole of London is 45 people/hectare. In relation to the number of residents per hectare of domestic gardens and buildings, the Royal Borough is ranked as fourth in London in terms of the garden space ratio (357.5 people/hectare) with only Tower Hamlets, the City of Westminster and the City of London having less

space compared to a London average of 138.2. In terms of the provision of “greenspace”, there are 849.2 residents per hectare of greenspace with only the London borough of Islington having more people per hectare. This compares with a London average of 116.9 people per hectare. There are also a high number of households per domestic building at 2.6 per building, which is the third highest in London after the City of London and the City of Westminster; the London average being 1.1 households². These statistics illustrate open space in the borough is at a premium and that its protection and improvement are important to the amenity of its residents.

Q12.1: Do you support this option? You can pick more than one.

We support Option 1 on the provision of childrens playspace. We also welcome the proposal for an updated audit of Open Spaces in the Borough.

This audit should recognise and include the three Local Green Spaces designated via the StQW Neighbourhood Plan and the level of protection from development that this designation provides.

SECTION 13: CONSERVATION AND DESIGN

Issue 1: Building heights

The London Plan 2021 Policy D9: Tall Buildings requires that our NLPR should define what is considered a tall building for specific localities. Tall buildings should not be less than 6 storeys, or 18 metres measured from ground to the floor level of the uppermost storey. It also says that our NLPR should identify locations where tall buildings may be an appropriate form of development. It is therefore important that we start addressing this issue as part of this consultation.

A series of options for how we address tall buildings in the New Local Plan are set out under Issue 1 of Section 13 of the Issues and Options paper.

Q13.1: Which of these options do you support? You can pick more than one.

We support the detailed response from the Kensington Society on this section of the NLPR document. As explained above the Forum will oppose applications that include proposals for Kensal Canalside which appear to intend to include several residential towers at 35 storeys, further examples at 20-24 storeys, and ‘mansion blocks’ above 12 storeys. These building typologies are alien to the Borough, and involve densities wholly inappropriate to PTAL levels in the Opportunity Area.

The text and diagrams at 13.6 to 13.8 of the NLPR document, on the definition of a ‘tall building, we find confusing and distraction from the more fundamental issues involved.

Issue 2: Design quality, character and growth

Chapter 12 of the NPPF recognises that one of the fundamental requirements of the planning and development process is to deliver well-designed, high-quality buildings. It puts

the onus on local authorities to proactively support high quality new development by working with local communities to identify the type, scale and character of new building that will be acceptable across the Borough.

The Borough's design policies put the preservation of its character at their heart. As part of producing the NLPR we have been undertaking a Character study. This will assist us to identify areas and opportunities for growth, as well as reinforce areas for protection.

Options for approaches to design policy are set out under Issue 2 of Section 13 of the Issues and Options paper.

Q13.3: Which of these options do you support? You can pick more than one.

COMMENTS

Our Forum's management committee took part, along with Latimer Road residents and building owners, in the preparation of the recently adopted Design Code for Units 1-14 Latimer Road.

This exercise demonstrated the level of work involved, from all participants, in such an exercise. The Government's original ambitions for the use of Design Codes were as a primary means of citizen involvement (as a replacement for public consultation and local authority consideration of planning applications). Such proposals have been dropped. The extent of work involved for planning authorities seemed to lack realism.

On Option 1 and the idea of a Borough-wide Design Code we struggle to see what form this would take? The initial exercise by consultants Arup on a borough-wide characterisation study was superficial and lacked the necessary detail,

On Options 2 and 3, design codes for individual larger development sites offer potential for involving residents and neighbours in an exercise which attempts to find consensus on built form, massing, heights and materials.

The National Model Design Code gives examples of densities and building typologies ranging from 'High Rise City' to 'Rural Settlement'. It is notable that densities deemed appropriate for an 'Urban Neighbourhood' are far lower than those being proposed by developers at Kensal Canalside.

Q13.7: We consider that most parts of the following existing policies are still fit for purpose, but some of them 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 on this.

- *Policy CL5 Living Conditions*
- *Policy CL6 Small-scale Alterations and Additions*
- *Policy CL7 Basements*

- *Policy CL8 Existing Buildings – Roof Alterations/Additional Storeys*
- *Policy CL9 Existing Buildings – Extensions and Modifications*
- *Policy CL10 Shopfronts*
- *Policy CL11 Views*

These are key policies used by applicants and their advisers when preparing proposals for alterations to their homes (extensions, loftrooms, basements) and by RBKC planning officers when determining applications.

Our Forum works routinely with these policies in making representations on individual applications. In preparing the StQW Neighbourhood Plan, we came forward with proposed adjustments and variations to certain policies, where we felt they were unduly restrictive in hampering homeowners to make good use of space in their homes. The majority of these were accepted at independent examination and have been in force in the StQW neighbourhood since 2016.

In some cases the neighbourhood plan has allowed for policy variations that allow for homes to be better insulated and made more sustainable.

We think that the wording of all of these policies will need careful review in the context of the the Council's new policies on climate change and achieving. We support the Kensington Society's comment that this set of policies need to be 'green-proofed' and will comment in more detail at the next iteration of a Draft Local Plan.

There are issues which have emerged since these CL policies were first drafted, which will need to be covered in a new Local Plan. The tension between conservation policies and A4 Directions resisting changes to roofs and facades and the appearance of buildings on the one hand, and improved insulation on the other, is but one of these.