



Your neighbourhood, your views

# St Quintin and Woodlands Draft Neighbourhood Plan



ST QUINTIN AND WOODLANDS  
DRAFT NEIGHBOURHOOD PLAN  
2015-2030  
CONSULTATION VERSION  
NOVEMBER 2014

## ST QUINTIN AND WOODLANDS NEIGHBOURHOOD PLAN – CONSULTATION DRAFT

### Context

0.0.1 This consultation version of the StQW Draft Plan seeks comments and input from local residents, businesses, and from all the various agencies and public bodies with an interest in the future of this part of North Kensington.

0.0.2 A revised version will then be submitted to the Royal Borough of Kensington. The Council will arrange for an independent 'examination' of the revised Draft Plan. With any modifications proposed by the Examiner, a local referendum on the final Plan will subsequently be held. If supported by a majority of those voting, the StQW Neighbourhood Plan will be adopted by RBKC as part of the statutory planning framework for the Borough.

0.0.3 This consultation version is a lengthy document (over 100 pages). Each successive version will be shorter. The final version will concentrate on the proposed 'Policies' and the justification for each. These are the heart of the StQW Neighbourhood Plan.

0.0.4 Two sections within this Consultation Version, on conservation and on Latimer Road, have become lengthier and more detailed as work on the Plan has continued. This is because RBKC planning officers have questioned and challenged the proposals on these two topics. It has therefore been necessary to include more detailed evidence and information to support and justify these parts of the Plan, in order that an independent Examiner can reach conclusions on their merits. These are also two topics on which this Plan proposes change to the status quo, in terms of how the Council currently considers and decides planning applications within this part of the Royal Borough.

0.0.5 Comments and suggestions are invited on any or all the 12 sections on this Draft Plan, and you may have views only on only some of its proposals. All such views are welcome. **Please send comments by email to [info@stqw.org](mailto:info@stqw.org).** If you do not have access to email, and are reading a hard copy of the Plan, you can also comment by ringing 0207 460 1743 or writing to StQW Plan, 95 Highlever Road, London W10PW.

### Background

0.1.1. The St Quintin and Woodlands Neighbourhood Plan grew from the work of the St Helens Residents Association in North Kensington, London. The Association was formed in 2008 and swiftly found its activities dominated by local planning issues. Following enactment of the 2011 Localism Act, the association saw the potential of neighbourhood planning as a means bringing together local residents and businesses for the future benefit of the area. An application for designation of a neighbourhood area was made in April 2012, at the earliest opportunity after the Neighbourhood Planning Regulations came into force.

0.1.2 Kensington & Chelsea is well known as a part of London with the highest residential values in the UK. It is a cosmopolitan and diverse part of a global city, with characteristics that make it a special place to live – appreciated by longstanding residents and sought after by those wishing to move into the area.

0.1.3 The attractiveness of the area creates its own challenges, in the form of house prices far beyond the reach of most people, continuous building work on properties, high population turnover, and the more recent phenomena of 'Buy to Leave' (houses and flats purchased as investment and left unoccupied for much of the year). While the northern part of Kensington has not so far been seriously affected by these unwelcome aspects of the capital's housing market, there is concern within the StQW neighbourhood that this is only a matter of time.

0.1.4 Hence one of the main themes of this Plan is ensure the continuation of the StQW area as a genuine 'neighbourhood' in which

- the ties of a local community remain strong
- houses, shops, offices and other buildings remain occupied and well used
- friendliness and good neighbourliness remain an everyday part of the quality of life

0.1.5 The desire of local people to achieve this aim has come through strongly in the household survey carried out by the StQW Forum, and at public meetings held during the preparation of the neighbourhood plan.

### **Designation of the neighbourhood area and the StQW Forum**

0.1.6 The neighbourhood area originally proposed in April 2012 was a cross-borough area of some 2,000 households, mainly in North Kensington and including a series of streets in Hammersmith & Fulham. The St Helens Residents Association took the view that these latter streets, separated as they are from their neighbouring communities by the West London Line, form part a coherent neighbourhood sharing shops and other local facilities and with a similar built form and demographic. This reasoning was set out in more detail in the [designation application](#) submitted to both Borough Councils in April 2012.

0.1.7 In the event there was over a year's delay in decisions on the application by the two councils involved. This was partly because the 2012 Regulations on Neighbourhood Planning had only recently been published, and a cross-borough application raised questions on which Government guidance was limited. The statutory 6 week public consultation on the designation application (May to July 2012) showed universal support on the RBKC side of the borough boundary, with an equality of views for and against the proposals on the LBHF side.

0.1.8 RB Kensington & Chelsea approved designation of the StQW Forum and that part of the area lying within its own borough in July 2013. LB Hammersmith & Fulham made a set of decisions in September 2013 to refuse designation of the StQW Forum and to designate an alternative small area within its own borough boundary (for which no body or group has since come forward with proposals to prepare a neighbourhood plan).

0.1.9 Given this scenario, the specific planning policy proposals set out in this Draft Plan relate only to the designated area with Kensington & Chelsea. A separate 'Basic Conditions Statement' explains in detail how the proposals, in the view of the Forum, meet the required test of being in 'general conformity' with the RBKC borough-level 2010 Local Plan and the Greater London Authority's 2011 London Plan.

0.1.10 Certain of the wider policy aspirations in the plan, particularly on public transport and traffic issues, have relevance to LBHF residents and businesses as well as those in RBKC. Hence the StQW Forum will continue to listen to views and comments from both sides of the borough boundary, during the statutory 6 week consultation on this 'Pre-Submission' version of the Plan.

0.1.12 The StQW neighbourhood area designated within RBKC covers 42 hectares and includes some 1,700 households. A map showing the StQW boundary and key sites in the area is shown below and also at this [link](#). The neighbourhood area lies within parts of the new Dalgarno and St Helens wards, and forms part of the larger Oxford Gardens Conservation Area.





Boundary of the designated St Quintin and Woodlands Neighbourhood Area shown in red.

## History of development in the area

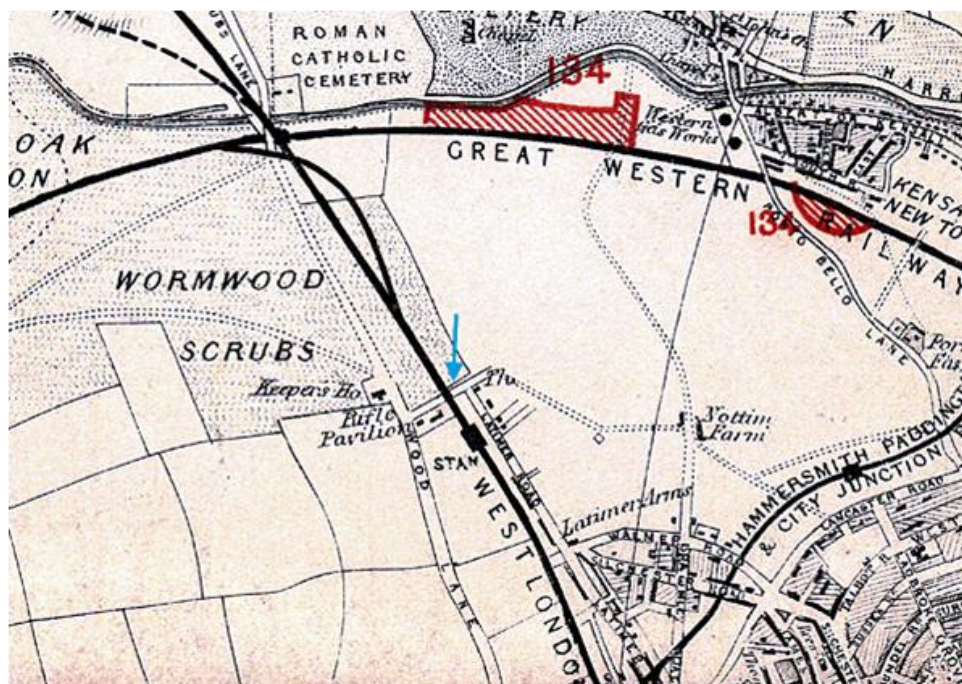
0. 1.13 The StQW neighbourhood is largely residential, and was built in the late 19th/early 20th century. It includes one street (Latimer Road) which is designated within the 2010 RBKC Core Strategy as a part of the combined Freston Road/Latimer Road Employment Zone.

0.1.14 The building of the streets and houses in the neighbourhood followed swiftly from the construction of the Hammersmith and City railway across North Kensington in the mid 19th century. This opened up a previously rural area to landowners and builders eager to invest in London's westward expansion. Land west of Ladbrooke Grove was laid out and developed from 1870-90 by architects and builders engaged by the St Quintin family.

0.1.15 The Hammersmith & City railway (opened in 1864) was the first of the feeder lines to be connected to the Metropolitan Railway, which had been opened between Paddington and Farringdon Street in January 1863. It extended from its western terminus at Hammersmith through Shepherd's Bush and Notting Dale to its junction with the Great Western Railway at Westbourne Park. There was also a connection with the Birmingham, Bristol and Thames Junction (later renamed the West London Railway).

0.1.16 Latimer Road, running alongside the West London Line, was from the late 1880s onwards an important north/south route running down to Holland Park Avenue. The severance of this route by the construction of the Westway in the late 1960s has had a lasting impact on Latimer Road and on movement and connectivity generally within this part of North Kensington.

0.1.17 A further phase of development to the estate took place between 1891 and 1905 and was undertaken by builders working for W H St Quintin. This involved the building of several hundred red brick family houses in a series of wide terraced streets (with some larger end of terrace houses).



*(The area in the 1870s, including railway transport links. The original station shown here was located on Latimer Road. The station was moved northwards in 1893 to the site shown by the blue arrow, at North Pole Road and then closed in 1940)*

0.1.18 After the 1914-18 war other parts of the St Quintin neighbourhood were developed mainly for workers housing by the Kensington Borough Council and by various charitable trusts. In 1919 the Council bought nine acres in the vicinity of Methwold and Oakworth Roads, and by 1926 had built 202 cottages or cottage flats, to designs by the architect A. S. Soutar. These streets were added to the Oxford Gardens/St Quintin Conservation Area in 2002.

0.1.19 The North Pole was a Victorian public house located on the corner of Latimer Rd and North Pole Rd W10. Until the recent loss of the pub (now a Tesco Metro) there had been a pub on this site since about 1839 when the Globe public house was built near the north west corner of the Hippodrome racecourse.

0.1.20 The streets to the north of North Pole Road (Bracewell Road, Brewster Gardens, Dalgarno Gardens south side) are made up of Victorian two storey housing. Formerly part of the London Borough of Hammersmith & Fulham, these streets became part of Kensington & Chelsea in 1996. These streets were also added later to the Oxford Gardens Conservation Area.

0.1.21 Prior to these 19th and early 20th century developments, most of the StQW neighbourhood had been open fields. The areas of Notting Barns and 'the Potteries' (further south) contained housing, and were notorious as one of London's worst slums with very high rates of infant mortality and disease. Intervention by the Kensington Vestry and various Victorian benefactors addressed most of these problems. The former Princess Louise Hospital in Pangbourne Avenue, funded through private subscription, was opened in 1928 to provide medical care to the poor. The Kensington Memorial Park, which remains the main public open space within the neighbourhood area, was opened in 1926.

0.1.22 Much of the housing stock built in the area in the late 19th and early 20th centuries was in poor condition by the 1970s, with many houses multi-occupied. The St Lawrence General Improvement Area was declared by RB Kensington & Chelsea in 1984.

0.1.23 The threat of the London Motorway Box in the 1960s (of which only the short section of the West Cross Route was ever built and the remainder of the project abandoned) brought local residents together during that decade. The impact of rail servicing arrangements for the Channel Tunnel was also a threat to the area, now long past.

0.1.24 Hence the neighbourhood has a history of facing challenges resulting from London-wide and national infrastructure projects. Local residents find themselves in this position once again with the proposals for the HS2/Crossrail hub at Old Oak Common, with related large-scale commercial and residential development.

### **What the neighbourhood plans aims to do**

0.1.25 The extent to which neighbourhood plans can influence major infrastructure change is limited. Such change in this part of London is being determined largely by higher level plans (the London Plan, the proposed Mayoral Development Corporation for Old Oak/Park Royal, the GLA/LBHF Opportunity Area Framework for White City, and the Core Strategies of both LBHF and RBKC).

0.1.26 Within the constraints of achieving 'general conformity' with relevant higher level plans, a neighbourhood plan can still have significant influence on what happens within a small area. The StQW Neighbourhood Plan:

- introduces policies on employment and housing which will contribute to sustainable development of the neighbourhood and its long-term success, adjusting where necessary certain RBKC Core Strategy policies and bringing these more into line with the National Planning Policy Framework.
- provides for residents a clear and understandable set of conservation policies, largely reflecting those that apply Borough-wide while fine-tuning these to the character and building types within the neighbourhood.
- asks RBKC to update the existing Article 4 Directions<sup>1</sup> which already apply to specified streets and part streets within the StQW neighbourhood, and adds some new elements to these, following local consultation on conservation, heritage and design.
- proposes policies for the regeneration of Latimer Road, as a part of the neighbourhood which has not fulfilled its potential since the construction of the Westway in the late 1960s
- contributes to the Borough's targets for new housing
- addresses issues on transport and traffic, with an eye to the greatly increased demands being placed on the local road network as a result of development in the surrounding area.

0.1.27 The scope of a neighbourhood plan is defined in law in what is now Section 38A(2) of the Planning and Compulsory Purchase Act 2004. This establishes that '*a neighbourhood development plan is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan*'.

0.1.28 As is the case with many of the neighbourhood plans drawn up to date, parts of this document refers to issues which fall outside a strict definition of '*development and use of land*'. Subjects such as transport and community safety are examples. In such cases, a neighbourhood plan needs to distinguish between

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<sup>1</sup> Article 4 Directions are the statutory means whereby local authorities may remove Permitted Development rights, thus requiring planning permission for specified forms of development such as roof or facade alterations. See under Section 2 of this Plan and Annexe B for more information.

'policies' as such, which will ultimately form part of the statutory Local Development Plan, as compared with other forms of recommendation or proposal.

0.1.29 This Draft Plan uses the term 'Actions' to distinguish such recommendations from 'Policies'. **It is the Policies alone which will form the statutory part of this Plan.** Subject to a successful local referendum, these policies will in future carry 'material weight' in decisions by RBKC on planning applications on sites and buildings within the StQW neighbourhood.

0.1.30 CLG Planning Practice Guidance requires that 'actions' dealing with other than land use in a neighbourhood plan *'should be clearly identifiable, for example set out in a companion document or annexe'*. In this Draft Plan, the proposed 'Actions' are shown under the relevant subject heading, as this makes the document more coherent for the reader.

0.1.31 In all sections of the document, the 'Actions' are clearly identified by being shown under a separate heading and in a different coloured typeface. It may prove that an Examiner will insist on *Actions* being placed in a separate companion document, for the final adopted Plan. Different Examiners have to date taken different views on this issue.

### **Duration of the StQW Neighbourhood Plan**

0.1.31 This Neighbourhood Plan is intended to cover a maximum 10-15 year time period, covering the period from 2015-30. It may require earlier review in the light of the major developments that will be taking place in the surrounding Opportunity Areas, or if RB Kensington & Chelsea make substantial changes to its own Core Strategy.

### **Evidence base for the Plan**

0.1.32 Details of the documents, survey returns, and other information used in the preparation of this Plan are provided as an annexe to the accompanying 'Basic Conditions Statement'. In summary this material consists of:

- 105 detailed responses to a survey questionnaire circulated to 2,000 households in the RBKC and LBHF parts of the neighbourhood area. A response rate of 5% was achieved despite the fact that the survey required significant time input from the respondent.
- interviews with retailers and services in the shopping parades in the neighbourhood and with businesses in Latimer.
- a series of open meetings of the Forum (with average attendance of 50 residents and businesses) drop-in sessions and consultation workshops on the various subjects and proposals included within the Plan.
- contact with landowners and agents, on the small number of development sites in the neighbourhood
- discussions with RBKC planning officers
- RBKC and national datasets, reports and evidence as used in the preparation and updating of the RBKC Core Strategy, the LBHF Core Strategy, and various RBKC and LBHF Supplementary Planning Documents.

0.1.33 Use of evidence published by RBKC in support of its Core Strategy has been made more difficult by the fact that ward boundaries do not align with the neighbourhood boundary, and were also changed as from May 2014. The StQW neighbourhood area covers what was approximately one third of the former St Charles ward (the western part) and one third of the former Notting Barns ward (the northern part). It now covers part of St Helens ward and part of Dalgarno ward.

0.1.34 The StQW neighbourhood area will continue to be split between these two wards, but the new St Helens ward is smaller than the former Notting Barns ward and maps more closely to the StQW area (and that covered by the St Helens Residents Association).

0.1.35 When using demographic and socio-economic data in this plan, we have relied largely on the ward profiles published by RBKC. Averaging figures across the two previous wards gives a rough approximation for data for the StQW neighbourhood area, but it should be noted that the latter includes the more affluent part of both former wards and that this skews average figures.

## 0.2 THE WIDER PLANNING CONTEXT – DEVELOPMENT PRESSURES AND DRIVERS OF CHANGE

0.2.1 The StQW neighbourhood area lies within an area of inner west London for which there are a series of major infrastructure and development plans spanning the next 30 years.

0.2.2 Three of London's thirty three Opportunity Areas surround the neighbourhood. These are Old Oak/Park Royal, White City and Kensal Canalside. Opportunity Areas are designated by the Mayor of London and London Boroughs and are defined in the London Plan as *'London's major source of brownfield land with significant capacity for new housing, commercial and other development linked to existing or potential improvements to public transport accessibility'*. Hence these areas are treated in planning terms as being suitable for 'intensive' development, with implications for the surrounding areas.

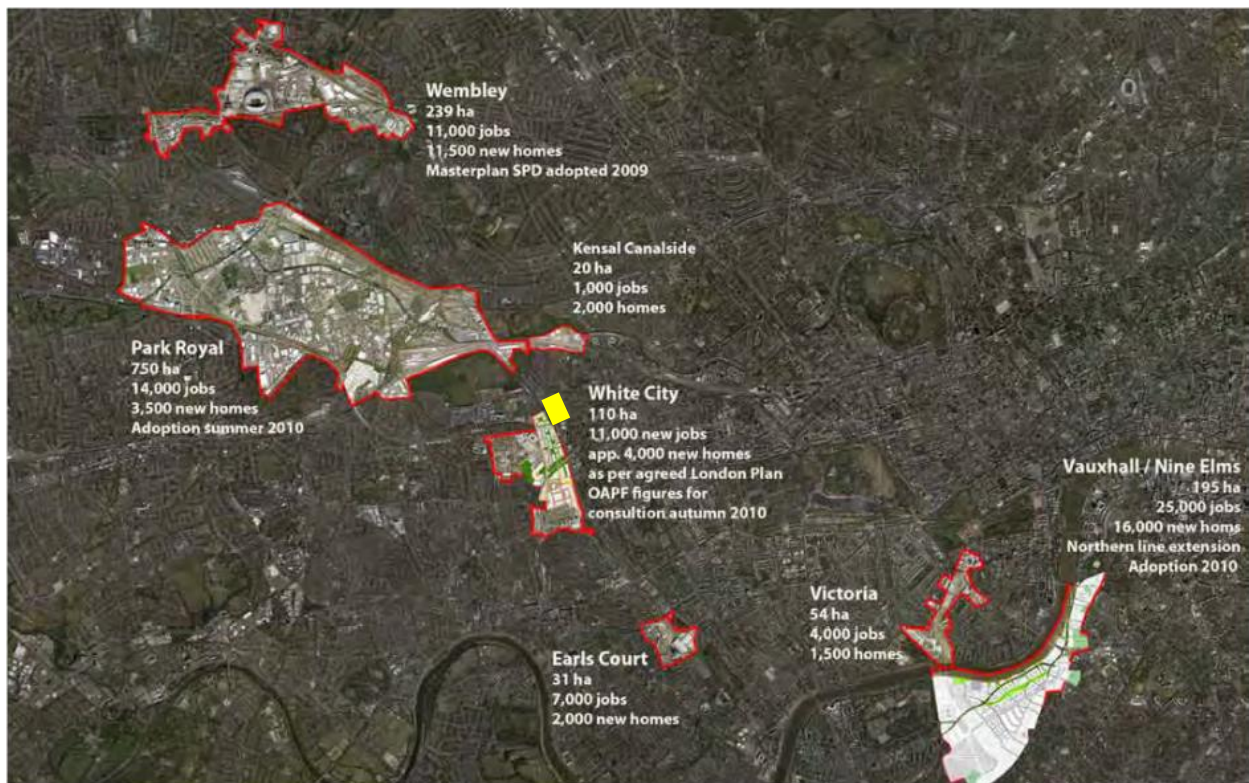
0.2.3. The **Old Oak Opportunity Area**, north of Wormwood Scrubs and stretching across the three boroughs of Hammersmith & Fulham, Brent, and Ealing, is the proposed site for the HS2 and Crossrail transport hub. The 'Mayoral vision' for the area, published in June 2013 by the GLA and relevant Borough Councils, envisages a West London development on a scale to complement to Canary Wharf and described by the Mayor as a 'mini-Manhattan'.

0.2.4 Proposed Revisions to the London Plan (2014) state that the area could accommodate *'substantial development which could yield 24,000 new homes and, subject to capacity and demand, up to 55,000 jobs and a variety of complementary and supporting uses in a commercial hub around the station and in the wider area'*. A cluster of very tall buildings is suggested, around the transport hub.

0.2.5 The Mayor of London consulted in autumn 2014 on proposals for a **Mayoral Development Corporation for Old Oak**. Such a body would take over planning powers from the London Boroughs. The Mayor has argued that *'To support delivery across the three London boroughs it is important to have a single robust plan with clear direction and governance'*. The StQW Forum has reservations about 'single robust direction' with very limited local democratic accountability and would prefer a governance model based on joint working by the Borough Councils involved. While this is also the strong view of Hammersmith & Fulham Council (which covers the larger part of the Old Oak area) it seems likely that the Mayor's proposal will prevail and that the MDC will go live as from April 2015.

0.2.6 **Queens Park Football Club** published in September 2014 a set of very outline proposals for the Old Oak area, and have commissioned a masterplan from the Farrell Partnership. Their proposals involve a new football stadium, with adjacent housing and commercial development. **Car Giant** own 45 acres of the land within the QPR proposals for 'New Queens Park' and have their own plans for a development of 9,500 homes and a 'new high street' and 'cultural hub' on their own site. Car Giant state that they oppose the QPR plans and it remains to be seen which (if either) if these proposals prevail at the end of the day.





The

*Opportunity Areas surrounding the StQW neighbourhood, which is shown as a small yellow box.*

0.2.7 The **White City and Kensal Rise Opportunity Areas** are also close to the StQW boundary (in White City's case immediately across the West London Line behind Latimer Road). Developments here are already impacting very directly on the neighbourhood. The Imperial West site within the White City OA has seen four 10 storey blocks of student housing built in 2011/12 and work has now started on the second phase (the 12 storey Research and Translation hub). Final planning permission was also granted (in 2012) to a 35 storey residential tower adjacent to Wood Lane and the Westway roundabout, yet to start construction.

0.2.8 Imperial's additional land holding (the former Dairy Crest site) now forms part of a 25 acre site. Plans for this southern section of the site have yet to emerge. The College has also revised its original plan for a 13 storey hotel on the Woodlands site, and will now be using this location for a bio-medical engineering centre. A planning application is expected in early 2015.

0.2.9 RB Kensington & Chelsea's plans for the Kensal Canalside OA are less well advanced. Several major landowners are involved, and negotiations between them are complex. The Council is also continuing to lobby the Government for a Crossrail station at this location. RBKC published an initial consultation paper for the Kensal Gasworks Strategic Site in mid 2012, but no firm plans have subsequently emerged.

### **Implications for the StQW Neighbourhood**

0.2.10 The scale of development proposed for these Opportunity Areas is massive, by London and even global standards. While it will be 30 years before the full impact on the StQW neighbourhood is seen, the changes will be profound. Three main concerns have emerged in consultation and discussions:

- none of the proposals for individual sites, nor the various planning frameworks and 'illustrative masterplans' for the wider area, explain adequately how the demands on the local road network will be met - particularly the A219 Scrubs Lane/Wood Lane as the main north/south route through the

area. This is a major concern for local people. A neighbourhood plan can have only a limited impact on transport issues, through proposed 'Actions' and through specific 'Policies' where development and use of land is involved. Section 5 of this Draft Plan covers these.

- the western skyline of this part of London currently remains relatively open and unobstructed by tall buildings. This will change forever. There is very little that a neighbourhood plan can do to prevent or ameliorate the impact of such development, but Section 4 of this Draft Plan sets out measures to support and strengthen RBKC policies on tall buildings.
- the sense of being at the edge of inner London, in an enclave originally designed to be more 'suburban' than 'urban' and with open green spaces and wide and peaceful streets, is also at risk of continued erosion. These current qualities of the neighbourhood were frequently mentioned in responses to the StQW Survey. Updated conservation policies, and policies on open space, are included in Sections 2 and 4 of this Draft Plan.

0.2.11 Overall, the 30 year development of the Opportunity Areas surrounding the StQW neighbourhood represents huge change to this part of inner West London. Local people can only hope that this change will prove to be well planned and steered by the range of planning authorities and public bodies involved (the London Mayor and GLA, the two Borough councils, Transport for London, Railtrack and HS2 Ltd).

### **The impact of market forces - house prices and commercial rents in the StQW area**

0.2.12 The information above explains what is happening within the formal and statutory processes of the planning system. A separate (and relatively uncontrolled) set of forces is also changing the character, and look and feel of the StQW area. The workings of the London housing market are having a powerful effect. So are the workings of the commercial market for office space. But the two impacts are proving to be very different.

0.2.13 History is in a sense repeating itself. A part of London created and built in the late 19th century, as a result of the decisions of investors in railway lines and speculative housing stock, is now seeing its built form, demography and social composition refashioned once again through the market forces of the 21st century.

### **Impact of the housing market**

0.2.14 On housing, local residents are very aware of the impact on the neighbourhood of a London housing market which historically has alternated between periods of rapid price rise and significant falls. House prices drive levels of investment in refurbishing existing properties, as well as the market for any possible residential development sites, large or small. These issues are explored in more depth in Section 10 of this Plan on Housing. The main elements are:

- proposals on individual development sites seen by the Forum as suitable for additional housing, as the area's contribution to the housing targets set for the Borough in the London Plan.
- proposals for wider mixed use in Latimer Road, including a relaxation of 2010 RBKC policies which restrict the prospects for anything other than B classes uses (office, light industrial, warehousing) in those sections of the street that fall within the boundary of the Freston Road/Latimer Road Employment Zone.

### **Business, retail, and employment activity the neighbourhood**

0.2.15 The situation in respect of business and retail activity in the StQW neighbourhood contrasts strongly with that on housing. Whereas there are buyers chasing every residential property, there is a long-term problem of lack of demand for existing office floorspace at the southern end of Latimer Road.

0.2.16 Section 8 of this Draft Plan sets out proposals for the future of Latimer Road. This is a key part of the Plan, on which the Council has signalled that it will object to the StQW proposals on grounds of failing to 'generally conform' with the RBKC Core Strategy. **Further comments on the future of Latimer Road during the 6 week 'Pre-Submission consultation' will be particularly welcome, in order to strengthen the evidence base for the policy proposals in Section 8 below.**

0.2.17 The StQW neighbourhood area includes two local shopping parades, in North Pole Road and St Helens Gardens, along with smaller clusters of shops in Dalgarno Gardens and Barlby Road. Despite (or as a result of) RBKC Core Strategy policies on resisting loss of A1 retail premises in such parades, a number of shop units have remained vacant in these parades for many years.

0.2.18 Section 7 of the Plan on retail and shopping parades explains the efforts made by the StQW Neighbourhood Forum to bring these vacant shops back into use. It also proposes a modest variation of current RBKC planning policies on local shopping parades, in line with Government encouragement for local planning authorities to take a more realistic view of the long-term economic viability of smaller high-streets and shopping parades.

### **0.3 CONSULTATION AND COMMUNITY ENGAGEMENT**

0.3.1 Following the inauguration of the StQW Neighbourhood Forum in June 2013, a new management committee was elected. This body looked at a range of ways in which local people could become involved in contributing to the preparation of this neighbourhood plan.

0.3.2 Details of the consultation carried out can be found in the Forum's Consultation Statement. This is one of several documents which will accompany the Draft Plan when it is formally submitted to the Council for independent examination.

0.3.3. Very briefly, the approach taken by the Forum's management committee to communication and consultation has been made up of the following:

- the StQW website, live since early 2014, and used as the vehicle to publish the several draft versions of the Plan, along with information about the Forum (committee membership, minutes of meetings, constitution, how to join)
- a StQW newsletter, of which 13 issues have been circulated to Forum members since June 2013 and have also published on the StQW website
- the StQW Residents Survey, circulated to all households in the area in January 2014
- public meetings of the Forum, open to anyone living or working in the area, at which the ideas and proposals for the Draft Plan have been discussed and agreed.
- additional drop-in sessions when the Forum was first formed, and on the future of Latimer Road.

### **0.4 HOW THIS NEIGHBOURHOOD PLAN ACHIEVES SUSTAINABLE DEVELOPMENT**

0.4.1 Neighbourhood Plans are required to take account of national planning policies set out in the National Planning Policy Framework. This relatively new framework (approved in its final form in 2012) now underpins the planning system across England, and reflects the Government's approach to meeting international goals for sustainable development across the globe.

0.4.2 The NPPF defines three roles for the planning system.

- an **economic** role, contributing to a strong, responsive and competitive economy
- a **social** role, supporting strong, vibrant and healthy communities

- an **environmental** role – contributing to protecting and enhancing our natural, built and historic environment

0.4.3 Annexe A to this document shows how the StQW Draft Plan relate to these three roles of the planning system.

0.4.4 The NPPF goes on to state (Paragraph 8) that *"these roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions"*.

0.4.5 In formulating this neighbourhood plan, the StQW Forum has sought to balance the weight applied to each of these mutually dependent goals.

0.4.6 The Forum has also been mindful of the Sustainability Appraisal developed by RBKC as part of its 2010 Core Strategy. This appraisal, prepared by independent consultants Scott Wilson, analysed the submission version of the council's Core Strategy in terms of its contribution to sustainability goals.

0.4.7 The Forum has asked the council to 'screen' the Draft of the StQW Neighbourhood Plan, to establish whether or not a full Strategic Environmental Assessment is needed. These assessments are a requirement of EU legislation, applying to different forms of spatial plan. Strategic Environmental Assessments are required for neighbourhood plans where these plans are likely to cause significant environmental effects. The Council will need to decide whether one is needed in this case.

0.4.8 In the meantime, the Forum has assessed how the StQW Neighbourhood Plan will contribute to the 16 Local Development Framework Sustainability Appraisal Objectives identified in the 2009 RBKC Core Strategy Assessment. This is shown in the second table in Annexe A.

## **0.5 VISION AND OBJECTIVES OF THE StQW NEIGHBOURHOOD PLAN**

0.5.1 The over-arching vision for the Plan has been developed via discussions at the StQW management committee and from responses to the household survey. We have tried to keep it simple. This vision statement was endorsed at the open meeting held on July 10th 2014.

***To secure the future of a neighbourhood that offers the best features of life in central London, for this and future generations***

0.5.2 From this vision, a set of 12 key objectives was developed for the plan. These are as follows:

1. **Keep the area as an attractive place to live and work, for families and individuals from current and future generations (This reflects the Keeping Life Local theme of the RBKC Core Strategy).**
2. **Update conservation policies to protect heritage, while reflecting contemporary lifestyles and making fully effective use of existing housing stock.**
3. **Protect environmental quality and the neighbourhood's wide streets and public realm including views within and from the conservation area.**
4. **Protect and enhance our open spaces, gardens and trees, both private and public, bringing backland green areas into community use where ownership permits.**
5. **Reduce traffic queues, noise and disturbance within the neighbourhood and improve pedestrian/cycle connectivity to the south and west.**



6. **Maintain safety, security and tranquillity in the area, contributing to a continued low level of burglary and street crime.**
7. **Safeguard the commercial viability of our shopping parades as sources of local convenience shops and services that residents need.**
8. **Maintain (and in some parts of the neighbourhood) widen the mix of uses to keep buildings occupied and in active use.**
9. **Maintain and where possible increase employment opportunities in the area.**
10. **Seek out opportunities for building housing affordable to younger generations**
11. **Protect local education, health and community facilities from commercial development pressures.**
12. **Manage new development in such a way as to conserve local character, in an area where land values are very high.**

0.5.3 Work in preparing the plan has involved different members of the management committee in taking the lead on one or more of these objectives and working up proposals in more detail, including consulting with relevant parties locally (businesses, shops, residents).

0.5.4 Some of these objectives lend themselves more readily than others to being shaped via land use and development planning policies. Those relating to issues such as transport and traffic require greater involvement from both Borough Councils (RBKC and LBHF) and from the GLA and from Transport for London (TfL).

## **0.6 WHAT HAPPENS NEXT ON THE DRAFT PLAN?**

0.6.1 This second published version of the Plan follows that first posted on the StQW website in July 2014. It has been significantly amended to take on board comments from RBKC officers, and to reflect developments in recent months (e.g. a series of public consultation affecting Old Oak, and the launch of the Council's review of the 'enterprise' sections of the 2010 Core Strategy).

0.6.2 Comments received during this consultation will be taken into account, and the Forum's management committee will prepare a 'submission version' of the Plan. This will be given to the Council, along with a set of accompanying documents (Basic Conditions Statement, Consultation Statement).

0.6.3 The Council will then arrange for the Plan to be 'examined' by an independent person, appointed by the local authority in consultation with the Forum. 'Examiners' are people with relevant professional experience in planning and law. The role of the Examiner is to ensure that the Plan meets the 'Basic Conditions' for neighbourhood plans to be adopted. These conditions are set by the Localism Act 2011. This Act states that neighbourhood plans:

- must have appropriate regard to national policy
- must contribute to the achievement of sustainable development
- must be in general conformity with the strategic policies in the development plan for the local area
- must be compatible with EU obligations, including Human Rights requirements

0.6.4 In order to demonstrate to an Examiner that this Draft Plan meets these various requirements, the StQW management committee has prepared a separate Basic Conditions Statement.

0.6.5 The job of the Examiner is to assess the neighbourhood plan against these conditions and to propose modifications on any aspects which fall short of the requirements. Examiners generally approach this role in a positive way, looking for ways in which the policy proposals in a Draft Plan can be amended to meet the conditions while continuing to reflect the aspirations and objectives of the body preparing the plan (i.e. a neighbourhood forum or parish or town council).

0.6.6 If approved by the Examiner, with or without modifications, the final draft Plan will be put to the vote in a neighbourhood referendum. This is organised and paid for by the local authority, and one such referendum has already taken place in the Borough (for the Norland Neighbourhood Plan).

0.6.8 If supported by a simple majority of those voting, the Plan becomes part of the statutory Local Development Framework of the local authority. Its policies will then be a 'material consideration' to be taken into account when the Council decides on planning applications within the StQW neighbourhood.

0.6.9 **The remaining sections of this Plan covers each of the 12 objectives, and sets out the numbered StQW proposed planning policies relating to each.** Proposed policies are shown in **red bold italicised** text. These are the part of the Plan which will have statutory force, if the Plan is successful at a referendum. Beneath each proposed policy a 'reasoned justification' is provided (**in dark blue bold italicised text**) summarising the arguments made in the main text of the Plan.

0.6.9 Under each set of policy proposals are a one or more numbered **Actions**. These relate to issues which are not 'planning' or 'development' matters in legal terms. These are shown in **green** text. They will not have the statutory force of the policy proposals in the Plan, but remain important as measures which the Forum would wish to see put in place, either through its own actions or those of relevant public bodies.

# Keeping life local

Objective 1 *Keep the area as an attractive place to live and work, for families and individuals from current and future generations.*

1.0.1 Kensington and Chelsea is widely recognised as a very desirable area in which to live, and one which has the highest average house prices in the country. In preparing this plan, the StQW Forum has gathered together information about what people like about the neighbourhood, what they like less, what they want to maintain and what they want to change.

1.0.2 The qualities and characteristics which people say they like about the area, its ‘friendliness’ and ‘neighbourliness’ will not always be directly amenable to planning policies. But indirectly they may be. For example, when responding to a survey question on ‘*What are the main reasons that you would use shops in the local area*’ most residents cited ‘convenience’. But many also went on to say that supporting smaller independent local businesses was important to them because regular visits to their favourite shops, cafes, or hairdresser are also part of their social interactions and a way of keeping up with neighbours. The Forum has therefore looked for ways in which our shopping parades can remain financially viable and survive.

1.0.3 These ‘village’ qualities are apparent in many parts of London, and are widely seen as something under threat – from faster population turnover, car-based and internet shopping, rapidly changing demographics, and the takeover of independent shops and pubs by national chains. Helping to maintain the viability of local shopping parades is thus a social, economic **and** a planning issue.

1.0.4 Hence the first policy of this neighbourhood plan is a broad one, and consistent with the RBKC Core Strategy strategic objective CO1 on ‘Keeping Life Local’. The STQW Forum aims to help to achieve this borough-wide objective, and to support the effective operation of the planning system in the Royal Borough, through active participation in the review of the Core Strategy, the preparation of Supplementary Planning Documents, and by providing local knowledge and input in responses to individual planning applications and appeals.

1.0.5 The Forum has tried to develop policies in this Plan with an eye to retaining those features and characteristics of the area which are most appreciated by local residents, while resisting some trends that are unwelcome. This is not an unthinking objection to all forms of new ‘development’. It is a recognition that the qualities of a successful city, and successful neighbourhoods within a city, are fragile and can easily be easily lost.

## KEEPING LIFE LOCAL: DRAFT POLICY StQW 1.

***a) To ensure that the StQW neighbourhood remains as a strong and sustainable part of inner London, within which families and individuals can flourish and support one another within a safe and attractive physical environment and a successful local economy, with an expectation that housing needs at different stages of life will be met and with local services, shops, and other amenities available within walking distance.***

## REASONED JUSTIFICATION

***Responses to the StQW Residents Survey show the extent to which people value what they like about the StQW neighbourhood area, and also the fears and concerns they have for the future. The above policy is consistent with the over-arching strategic objective CO1 of the RBKC Core Strategy. It is about ensuring***

*that the neighbourhood remains a sustainable residential area, with shops and facilities within easy reach and with sufficient local employment opportunities to maintain a successful local economy*

#### **ACTIONS**

*i) As a neighbourhood forum, to play an active part within the planning system, ensuring that the policies of the local planning authority are implemented, monitored, and reviewed, and planning applications determined, with maximum input from the neighbourhood level.*



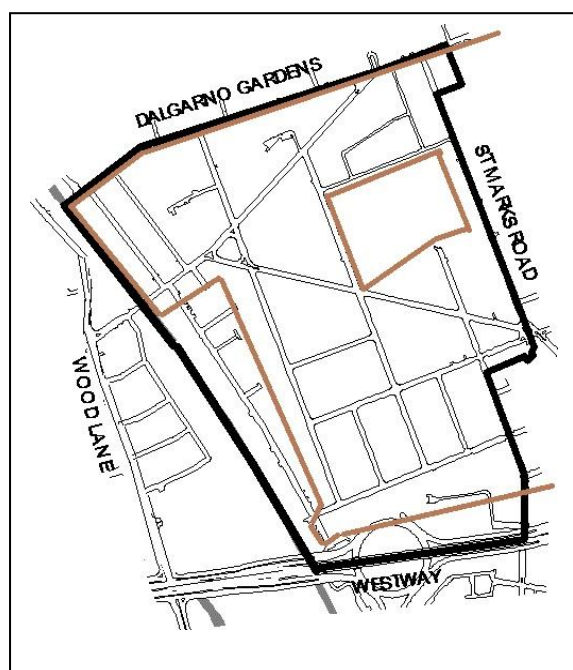
# Conservation

**Objective 2 *Update conservation policies to protect heritage, while reflecting contemporary lifestyles and making best use of existing housing stock.***

2.0.1 This neighbourhood plan contains a set of policies on conservation and design which aim to update and replace the RBKC *Conservation Area Proposals Statement (CAPS)* for the Oxford Gardens/St Quintin Conservation Area. The original conservation area was designated by the Council in 1979, and large parts of the Proposals Statement date back to that date. Some revisions to the Statement were made in 1990, and additional streets were added to the Conservation Area in 2002. The document continues to be used by the Council as 'policy guidance' in making decisions on planning applications, despite the fact that it is over 30 years old and now out of date.

2.0.2 The Council has started a programme of Conservation Area Appraisals, to replace the original CAPS documents. In light of the StQW Plan, the Council has decided to bring forward from 2016 to 2014 the appraisal exercise for the Oxford Gardens CA and has been undertaking this work since November 2014. The new Conservation Area Appraisals will not set 'policy', but will provide 'policy guidance' to planning officers when interpreting Borough-wide policies within each Conservation Area.

2.0.3 Oxford Gardens is a large conservation area, and the StQW neighbourhood forms only one part of it (broadly corresponding to what is defined as 'District C' in the original 1979/1990 CAPS document). Following the addition of streets in 2002, the boundaries of the conservation area now include Bracewell Road, Brewster Gardens, Dalgarno Gardens, Barlby Road, and Oakworth, Hill Farm and Methwold Roads. Hence almost all the streets in the StQW neighbourhood fall within the conservation area (Latimer Road and the streets off it being the exception).



*Boundary of that part of the Oxford Gardens Conservation Area falling within StQW Neighbourhood shown in brown*

2.0.4 The proposed conservation policies within this StQW Draft Plan have been drawn up through consultation and discussion amongst local residents. An initial set of proposals was discussed and voted on at a public meeting held on April 24th 2014, and some amendments (taking into account responses from residents) were agreed at a further public meeting on July 10th. These policy proposals will be further refined through the 6-8 week consultation on this draft version of the Plan.

2.0.5 The RBKC Core Strategy includes a set of Borough-wide Conservation and Design policies which RBKC has recently reviewed and updated. As part of this exercise 'saved' policies from the former Unitary Development Plan have been consolidated with those in the 2010 Core

Strategy. The resultant set of policies has recently been through an Examination in Public, with the Inspector proposing a number of modifications. The outcome will be formally adopted by the Council as part of the RBKC Core Strategy.

2.0.6 The STQW Forum considers that these Core Strategy policies provide a good framework at Borough-wide level, and welcomes the priority that the Council gives to protecting the heritage of this part of London. But some of the borough-wide policies are seen by residents within the StQW area as inappropriate to the particular dwelling types and street patterns that make up the neighbourhood. Some policies also create restrictions on how people wish to convert and adapt the interior of their homes.

2.0.7 Hence this Plan proposes a number of variations to RBKC Core Strategy policies on conservation which would (subject to a successful referendum) be applied to future planning applications within the StQW neighbourhood. The Council acknowledges that its policies on conservation are unusually detailed and hence are 'non-strategic'. Such policies are open to variation by a neighbourhood plan, provided that due regard is paid to national policies and guidance on conservation areas.

2.0.8 The Council also has a general duty under the 1990 Planning (Listed Buildings and Conservation) Act to '*preserve and enhance the character*' of conservation areas which it designates. This same duty applies to the making of a neighbourhood plan, and the StQW Forum is satisfied that the policies on conservation proposed below fulfil this requirement.

### **Backland areas**

2.1.0. The backland areas behind the terraced streets of the St Quintin Estate are part of its original design. They help to give the neighbourhood its special feel – a tranquil and open quality rare so near to the heart of London. While several of these pieces of land have been lost to development over the last century, some remain. Future planning policies for these sites are addressed in more detail in Section 4 of this Plan on Open Spaces and in Section 12 on Managing Development. Conservation policy in respect of these pieces of land is covered in this section.

### **Conservation policies applying to individual houses.**

2.2.1 Conservation area status is correlated with house values (a 9% premium in value, as evidenced by the [English Heritage/London School of Economics study of 2012](#)). It is therefore in the collective interest of all homeowners to ensure that conservation policies are upheld and enforcement action taken on any breaches. But conservation policies also need to be sensible and workable to enjoy majority support. They should not be unduly restrictive in preventing owners from adapting older houses to meet contemporary lifestyles. This balance is not always easy to strike.

2.2.2. In proposing a set of variations to existing RBKC policies, to apply within the boundary of the StQW neighbourhood (and to this part only of the Oxford Gardens Conservation Area) the Forum is seeking to get this balance right.

2.2.3 The outward appearance of the Edwardian and Victorian houses in the StQW area, as seen from the street, is the key feature of this part of the Oxford Gardens Conservation Area. The StQW neighbourhood became a conservation area in the 1970s because it is a good example of modest yet attractive and homogeneous domestic architecture of its time, and not because the area includes many Listed Buildings or those of special historical interest.

2.2.4 The streets of our neighbourhood are different from many parts of Kensington & Chelsea. We do not have the grander five storey stucco houses characteristic of other parts of the borough. Nor do we have the narrow streets, the mews, and the packed smaller houses of areas such as Hillgate Village. We do not have the shared garden squares that make the rear aspect of houses as important, in conservation terms, as their facades. Given these differences, this Plan seeks to introduce a set of policies which are fine-tuned to the

neighbourhood, and which will '*preserve and enhance*' the area's heritage while also responding to ways in which people wish to use the space available within their homes.

**2.2.5 As a general theme, the StQW proposals involve continued protection of the appearance of the front of houses, while allowing some more freedom at the back.** Analysis of planning appeals since 2003, in the streets of the StQW neighbourhood, shows that out of 26 applications refused by RBKC and taken to appeal, the Council's decision was overturned by a Planning Inspector in 10 cases. It seems clear that the Council is being over-prescriptive, by current national standards, on certain conservation issues. Each lost appeal imposes a financial burden on Council Tax payers. A growing number of these cases in recent years have related to rear dormer windows and rear/side extensions.

**2.2.6** In order for house-owners to understand the 'rules' that apply to different types of building alteration, it is necessary to understand the inter-relationship between planning permission and 'permitted development'. This relationship can appear complicated, not least because a building owner is required to refer to several different sets of Council documents or web pages. One of the aims of the final StQW Plan is to provide residents with a single document that explains all in one place.

**2.2.7** Annexe B to this Plan explains the current position on RBKC planning policies and Article 4 Directions, and the inter-action of these with national Permitted Development rules, for the StQW part of the Oxford Gardens Conservation Area. This annexe will be updated as the Council concludes its Conservation Area Appraisal for the Oxford Gardens area.

**2.2.8** Public meetings of the StQW Forum in April and July discussed 8 aspects of existing RBKC conservation policies, and voted on whether relevant RBKC policies should be strengthened, relaxed, or stay the same, in respect of our neighbourhood. The view at these meetings may or may not be fully representative of all 1,700 households within the StQW boundary and this Plan has included only those propositions for which there was clear majority support (rather than a divided view) at the open meetings. These discussions, along with responses to questions on conservation in the StQW residents survey, have formed the basis for the set of policy proposals detailed below. **More feedback during this 6 week consultation would be very welcome.**

### **Rear roof alterations**

**2.3.1** Rear dormer windows have long been an issue of contention in the neighbourhood. Under current RBKC policies, planning permission for loft conversions with appropriately designed rear dormers is granted for houses in most streets (or parts of streets) within the StQW area. But applicants can find their application refused on grounds contained within the Council's UDP Policy CD44/proposed new policy CL8b(i) which resists roof level alterations '*in complete terraces or groups of buildings where the existing roof line is unimpaired by extensions*'.

**2.3.2** This has led to perceptions of inconsistency and unfair treatment. Analysis of roofscapes in the streets of the StQW neighbourhood shows no terraces or part terraces which now have wholly 'unimpaired' rooflines (i.e no rear dormers). Rear dormers are now common across the StQW area, reflecting the fact that loftrooms provide a cost-effective means of proving an extra room in a family home. Denial of the opportunity to create a loftroom can have a big impact on families and can result in a forced move.

**2.3.3** There is a short section on the north side of Kelfield Gardens with only one rear dormer (approved in 1986) and where an application for another was refused and the Council's decision upheld in 2006. House-owners in this particular section of the street have since been told by RBKC case officers that rear dormers are not permitted in their properties. This is despite the fact that these residents look out onto rear dormers in sections of Kingsbridge Avenue (with 5), Highlever Road (with 3 ), and Wallingford Avenue (with 7). Since

the rear view of all four terraces is barely visible from the street, it is very hard to see how this continued restriction in one section of one street *'preserves or enhances the character of the conservation area'*? To the small extent that it might, does this justify a policy stance which has led at least one family to move house because of the inability to create a loftroom? The adjoining section of Kelfield Gardens, on the same side of the road, now has 7 properties with rear dormers, deemed acceptable and granted approval.

2.3.4 A similar situation existed until recently on the western side of Bracewell Road, where a row of terraced properties at Nos 1 - 33 was deemed by RBKC planning officers to be 'unimpaired' and as being *'read as distinct from other properties along the road'* (which have a number of rear dormers). Decisions by the Council to refuse four applications for rear dormers within this group of houses were all overturned on appeal during 2013 and 2014. The planning inspectors involved took account of the fact that this side of the street looks out onto a railway embankment, and has short gardens. Hence the Council's contention that anyone (even neighbours) was able to 'read' or gain benefit from the aesthetic appreciation of a row of rear roofs was deemed to be misplaced.

2.3.5 The StQW Forum therefore feels strongly that a consistent neighbourhood policy on rear dormers, should be introduced as part of this Plan. This would apply across those parts of the StQW area with *rear main* roofs that can take a dormer window (i.e. excluding the properties on the 'cottage' estate at Oalkworth/Hill Farm/Methwold/Barlby Road). It would not apply to side roofs. Planning applications would continue to be required, and RBKC case officers would remain in a position to consider proposed height, width, positioning in relation to the roof line and party wall, and the details of design and use of materials.

2.3.6 The change to the status quo is that the StQW policy would make it the norm for approval to be granted and would remove the requirement that a roofline must already be 'impaired' before further rear dormers are permitted.



*Rear dormers as part of loftrooms. The one in the centre conforms with current RBKC guidelines*

2.3.4. There have been a small number of occasions when house-owners have wished to make small alterations to the height of the roof ridge, in order to install insulation and improve energy efficiency. Where this outcome can be achieved without compromising a level roofline in a terrace, or appreciable change to the appearance and relationship of the property to its neighbours, the proposed StQW Policy 2(g) below would allow for this.

2.3.5 Local residents should note that, in the streets covered by Article 4 Direction 46/62 (see Annexe B to this Draft Plan) the Council does not allow roof slates to be switched to tiles, or vice versa. This is despite the fact that some streets may include examples of both forms of roof material. Where such works are carried out without planning permission, the Council is likely to pursue enforcement action and to require the reinstatement of the earlier roofing material.



## Rooflights

2.4.1 Rooflights in front roofs have a significant impact on the appearance of two-storey Edwardian and Victorian houses. Where these proliferate this is a common sign that the heritage of the area is under threat, or that conservation policies are not being adequately enforced.

2.4.2 Rooflights are 'permitted development' and hence do not require planning permission *except* where such rights have been removed via an Article 4 Direction adopted by the local authority.

2.4.3 In many (but not all) streets and parts of streets in the StQW Neighbourhood there has been an Article 4 Direction in place since 1985 which removes permitted development rights on all forms of roof alteration (see Annexe B to this Plan). This applies to exchanging slates for tiles, as well as dormers, mansards or other roof alterations. In the streets covered by this Direction, planning permission for rooflights is required. RBKC planning policy generally allows 'conservation-style' rooflights in rear main roofs, and also on side roofs at the end of terraces, but not in front roofs facing the street. For streets or addresses *not* covered by Article 4 Direction 46/62, property owners can install front rooflights as Permitted Development.

2.4.3 The view expressed at StQW Forum meetings has been that the status quo on rooflights should **remain unchanged**, with one small proviso. There are some streets, such as Pangbourne Avenue, in which RBKC planners have for many years 'discouraged' front rooflights when these form part of planning applications for loftrooms. Yet installation of a front rooflight under permitted development rights will be allowed in this street, and granted a Certificate of Lawful Development. This situation arises because Pangbourne Avenue is *not* covered by the relevant Article 4 Direction 46/62. This is one of several reasons why this Plan asks RBKC to introduce a single updated and consolidated Article 4 Direction applying to the StQW area.

2.4.4 A consolidated and updated Direction for the StQW area would allow for certain streets to be added or removed from the Direction, and give clearer guidance to householders as to which alterations require a planning application, and which do not. Hence this is proposed as one of the *Actions* in this Draft Plan.



*Front rooflights damage the view of roofscapes (image not from within the Conservation Area)*

2.4.4. The proposed StQW policy on rooflights would *not* affect streets excluded from Article 4 Direction 46/62, which already applies in certain streets within the neighbourhood. It would apply only to those streets/addresses listed under StQW Policy 2b below. Hence rooflights would remain permitted development in Bracewell Road, Dalgarno Gardens, the northern end of Highlever Road, and others. Front rooflights are already common in these streets, and there are no proposals in this Plan to introduce new restrictions. For Brewster Gardens, views to date at StQW public meetings have been that rooflights should

be resisted on the eastern side of the road. Hence this Plan asks (as an 'Action') that this side of the street be covered within an updated and consolidated Article 4 Direction for the StQW area.

### Painting of brickwork on front facades

2.5.1 Overpainting of original brickwork on front facades is strongly discouraged by the 1975/1990 Oxford Gardens Conservation Area Policy Statement. Many local residents have long assumed that RBKC planning policies impose a restriction. RBKC Article 4 Direction 46/64 (which applies to the 'red brick' streets of the StQW area) removes permitted development rights in respect of *'alterations and extensions to any part of those elevations of the dwelling house which front on to a highway'*. Common sense might suggest that overpainting is an 'alteration', but enquiries of RBKC last year established that this is not the case and hence painting of front brickwork can proceed as permitted development, without planning permission.

2.5.2 Open meetings of the StQW Forum have expressed a clear majority view that the character of this part of the Conservation Area would be severely damaged were there to be rash of painting of the attractive original Edwardian brickwork facades in the 'red brick streets'. At present there are limited examples of such overpainting, but the impact in e.g. Balliol Road (where 4 out of 26 house fronts have been painted over) is seen by the StQW Forum as harming the conservation area.

2.5.3 Hence one of the 'Actions' in this Draft Plan is to ask the Council to introduce an Article 4 Direction applying to the same streets and addresses as currently covered by Article 46/62 on roof and front alterations, which would remove permitted development rights on painting *'elevations facing the highway'*. Directions restricting painting of buildings apply in the Ladbroke, Norland and bother Conservation Areas in the Borough. **Streets not covered by the existing Direction 46/62 would not be added.** This would leave householders in Bracewell Road, Brewster Gardens and other unaffected streets, where many houses are already painted, free from any additional restrictions.

2.5.4 We would welcome more views on this issue from residents in Oakworth/Methwold/Hill Farm Road. At present these streets are not covered by any Article 4 Directions. There appears to be no moves to paint house fronts in these streets, and hence the status quo may need no change.



*Impact of painting of front facades in the 'red brick' streets in the Oxford Gardens Conservation Area*

### Front boundary walls and fences, bin and bike sheds.

2.6.1 These are a feature of the conservation area on which fashions have been changing. The original design of most of the streets on this part of the St Quintin Estate involved low brick walls, often with hedges above, and gates with piers approx 1m high. Recent years have seen a trend towards significantly higher walls and railings. There is now a wide variety of boundary treatments, including wooden paling fences and spiked railings as well as hedges.

2.6.2 The desire of house-owners to increase levels of security for the area in front of their houses is understandable (although the reality is that current levels of burglary in the neighbourhood are low). The trend has been coupled with the introduction of more hard surfacing and larger outdoor storage structures for bins and bikes. The cumulative effect has begun to change the feel of the streets in the neighbourhood.

2.6.3 Alterations to front boundary walls are a form of Permitted Development. This means that no planning permission is required, provided that the works remain within the nationally applied limits (these are a height limit of 1m where next to a highway/pavement or 2m elsewhere). Many front boundary walls in the StQW area appear now to exceed this 1m limit.



*Front boundary walls. The StQW Forum views this as a good example how original walls and paths can be sympathetically restored. Many others front walls/railings are over the 1m height allowed under Permitted Development and it is doubtful whether planning permission has been obtained in all cases.*

2.6.4 On bike and/or bin sheds, RBKC has recently taken enforcement action on a larger than usual structure in a front garden in the StQW area, for which no planning application had been made. This was 1.7m high and 2.1m long, and was refused retrospective planning permission on conservation grounds.

2.6.5 The view of the StQW Forum, as expressed at public meetings, has been that there should be some limits on the height and size of front boundary walls, and for structures in front gardens, if the character and feel of the neighbourhood is to be retained. The previous version of this Draft Plan proposed a slightly complex new policy setting out such restrictions. Given the wide range of changes to front boundary walls that have already been made in recent decades, it has proved hard to come up with a detailed policy which would now be seen as fair and not unduly restrictive.

2.6.6. Following discussion with the Council, this latest version of the StQW Plan proposes no new StQW policy as such. Instead, an 'Action' asks that the Council ensures that height limits set by Permitted Development rights are more robustly enforced. Discussion and publication of this Draft Plan aims to increase awareness of the limits set by Permitted Development rules, which do not seem to be widely understood.

### **Permeable surfaces in front garden areas**

2.7.1 These are disappearing across the neighbourhood, with a growing number of former front garden areas being covered with impermeable paving or slate. This creates problems of surface water run-off and resultant risk of flash flooding. Although this neighbourhood has no history of such flooding, this risk remains a real issue pending the proposed new Counters Creek sewerage/drainage system (see under Section 3 of this Draft Plan). Hence the StQW Forum wants to ensure that **permeable** surfaces are used in front gardens (other than for the main path). Such surfaces can include gravel, loose stones, or permeable concrete block laid to allow drainage to soil, or on a bed of sand.

2.7.2 The rules on Permitted Development allow the building or paving of a driveway or front standing, provided that permeable surfaces are used or the rainwater flows to a lawn or border to drain naturally. Coverage of more than 5 square metres using impermeable surfaces requires planning permission. For a number of streets/part streets in the StQW neighbourhood, this Permitted Development right has been removed via Article 4 Direction 69 (see annexe B to this Plan). Average front gardens in the 'red brick' streets of the StQW area are more like 40 square metres, so for the majority of the front gardens planning permission is needed to exceed rights under Permitted Development.

2.7.3. The Council already has a borough-wide policy CE2(f) of '*resisting impermeable surfaces in front gardens*'. In practice, there is little evidence of this policy being applied or enforced in the StQW area, where front garden works are frequently carried out without a planning application.

2.7.4 There is also an Article 4 Direction in place (No.69) which removes permitted development rights (in certain StQW streets) to '*provide or extend a hard surface (fronting onto a highway)*'. This currently applies only to specific addresses in Dalgarno Gardens, Barlby Road, Highlever Road, St Helens Gardens, St Quintin Avenue, and Oxford Gardens. The Direction dates from 1997 and the reasons for these addresses being selected are not clear.

2.7.5 Given this context, this Plan proposes a neighbourhood level policy which specifies more clearly an approach to hard surfacing. This would apply only where works to a front garden exceed permitted development rights, and would be compatible with RBKC policy CE2(f). No extension of the streets/addresses covered by Article 4 Direction 69 (see Annexe C for details) is proposed at this time.

#### **Ground floor rear/side infill extensions**

2.8.1 This form of extension, in which the original rear side passage of a terraced house is incorporated into the body of the ground floor, with a glazed roof to the party wall, has long been a popular form of alteration to properties in this neighbourhood. These may sometimes be called 'closet' or 'outrigger' extensions in the language used by architects and conservation officers. In many cases such alterations are granted Certificates of Lawful Development under Permitted Development rights, where they fall with the required limits on height, dimensions, volume, and remaining garden size. In other cases, such conversions are normally granted planning permission by RBKC (although not in all cases, given that Rights of Light issues may be involved).

2.8.2 In situations where one house owner wishes to build such an extension whereas their immediate neighbour does not, this form of ground floor conversion can create disputes. This makes it all the important for house-owners to seek planning advice at an early stage.



*A side/rear infill extension in a Highlever Road property*

2.8.3 Discussions at open meetings of the Forum have supported the idea of a StQW policy which would set appropriate parameters for this type of ground floor side extensions. These are proposed as a maximum height of 3m at the Party Wall (the height allowed under Permitted Development) and a maximum slope of 45 degrees on the additional roof

2.8.4 There is also one detail within the Council's proposed new borough-wide policy CL2 on Extensions and Modifications to Buildings which the StQW Forum considers inappropriate to the dwelling type in this neighbourhood area. CL2d(i) requires extensions to be '*visually subordinate to the original building*'. On occasions this has led to planning officers requiring a small setback of a few inches within the rear facade of a side extension, to demonstrate 'subordination'. Where required, this prevents the installation of full width sliding doors or glazing. The view of the Forum is that this is an overly prescriptive requirement which should not be applied to the terraced houses of the StQW area, the rear facades of which are of modest historic or architectural importance. Proposed StQW Policy 2c below addresses this issue.

### **'Garden studios and workrooms'**

2.9.1 House prices and pressure on space have led to an increase in the number of permanent outbuildings constructed in rear gardens in this neighbourhood, often described as 'workrooms' or 'studios'. Under Permitted Development Rights, outbuildings, sheds and garages do not need planning permission, within certain parameters. The most important are:

- no outbuilding on land forward of a wall forming the principal elevation
- must be single storey with a maximum eaves height of 2.5m and a maximum overall height of 4m with a dual pitched roof and 3m for any other roof.
- no verandas, balconies or raised platforms
- no more than half the area of land around the 'original' house to be covered by additions or other buildings.

2.9.2 In all cases such outbuildings are required to be 'ancillary' to the main house rather than a separate dwelling. There is local concern that the distinction between a 'guestroom' and a sublet mini-residence may become blurred, given that planning applications for garden outbuildings now sometimes include showers and WCs.

2.9.3 Current Council policies on such outbuildings are aimed more at conventional 'conservatories' rather than the type of structures now appearing in this area. The view expressed at public meetings of the StQW Forum has been that some form of restriction is needed to prevent outbuildings becoming visually over-dominant, reducing rear garden space, and creating problems of noise or loss of privacy for neighbours.

2.9.4 The previous version of this Draft Plan suggested a restriction on outbuildings in rear gardens which went further than the limits under Permitted Development. Following discussion with the Council, this proposed policy has been dropped in favour of an '*Action*' asking the Council to ensure that its new Policy CL2 on New Buildings, Extensions and Modifications to Existing Buildings is properly applied in relation to garden outbuildings. This '*Action*' also asks that the Council take prompt enforcement action in cases where no planning permission has been granted, and Permitted Development limits have been exceeded. **Again, views would be welcome on whether this will prove sufficient or whether a specific extra neighbourhood policy on garden outbuildings is required (as has been introduced in the Norland Conservation Area).**





*Example of a 'garden studio' built within the StQW area, which gained retrospective planning permission*

### Rendering and painting of rear brickwork

2.10.1 The Forum discussed at its April meeting whether to propose a relaxation of current RBKC policies on rendering the rear brickwork of houses in the Conservation Area. At present this is not permitted, above the ground floor. Insulated rendering of the rear of houses is one of the ways in which insulation levels can be improved, and fuel costs reduced. The Government are encouraging greater fuel economy and one of their new measures will be to offer home owners a voucher worth up to £6k to install wall insulation.

2.10.2 Upgrading wall insulation to current standards can improve performance by seven times. However technically it is not a straightforward matter. The Forum initially had divided views on whether this aspect of RBKC conservation policies should be changed, and **it was agreed to seek further views from residents**. A detailed note on [Solid Wall Insulation \(2\)](#) gives more information and technical details. The July 10th open meeting of the Forum took the view that painting or rendering of rear brickwork should become acceptable, at ground and upper levels.

### Basements

2.11.1 These have become one of the most contentious features of the refurbishment of houses in this neighbourhood, as elsewhere across the Royal Borough.



*Impact of construction work on basement projects, on the streets of the StQW Neighbourhood*

2.11.2 The increase in numbers of basement projects in recent years drew many responses in the StQW survey, some supportive and some very opposed. There are now 50 examples, since 2003, of properties in the 'red brick' streets of the St Quintin Estate where basements have either been built or granted planning approval.



2.11.3 RBKC has over the past two years been revising and strengthening its policy towards basements, and is now at an advanced stage in adopting a new set of detailed requirements for basement applications. The Council's future policy will require that basements should:

- not exceed more than one storey
- not exceed a maximum of 50% of each garden or open part of the site (85% currently)
- have a good quality construction management plan and traffic management plan
- ensure structural stability for neighbours
- plus some other conditions

2.11.4 The Forum is not currently intending to propose any further new policies on basements specific to this neighbourhood, on the basis that the RBKC borough-wide policy is being sufficiently strengthened. RBKC already operates a policy for the Oxford Gardens/St Quintin CA which does not allow the installation of **railings of balustrades around front light wells** (except where a semi-basement was an original feature of the house). The Forum considers that this policy should be continued. Glass bricks or flat conservation-style metal grilles provide an alternative solution

### **Front windows**

2.12.1 Existing RBKC conservation policies do not permit replacement which makes a material difference to appearance (including plastic or PVC window frames) and requires sash windows in wood. External security bars or grilles are similarly not allowed without specific planning permission. Double or triple glazing can be achieved in such replacement frames, and does not require planning permission except in a Listed Building. The Forum supports the continuation of these policies, and hence no change is proposed in StQW Policy 2 below.

### **Other alterations to the front of houses**

2.13.1 RBKC Policy CL8 requires that alterations to the front of houses *do not harm the existing character and appearance of the conservation area*, and requires telecommunication equipment to be 'sited discreetly'. The view of the Forum has been that a more specific neighbourhood policy would be valuable, applying the same requirement for 'discreet siting' to any front alterations requiring planning permission.

### **CONSERVATION AND DESIGN: DRAFT POLICY StQW 2**

**2a) In respect of all streets within the StQW area, whether or not subject to the current RBKC Article 4 Direction 46/62 and with the exclusion of 'cottage' properties in Oakworth Road, Methwold Road, Barlby Road (south side) and Hill Farm Road, dormer windows enabling loft extensions will be permitted on rear main roofs subject to details of dimensions, positioning in relation to the roof ridge and party wall, and use of materials. This relaxation of RBKC conservation policies will not apply to those few properties in the StQW neighbourhood with 'London/butterfly' roofs.**

***Reasoned justification: there are no remaining streets in the neighbourhood which have rooflines without one or more rear dormers, and which are wholly 'unimpaired'. There are few viewpoints from which the rear of properties can be seen from the street or public areas. There are a small number of groups of terraced properties where RBKC policies CD44/CL8(b)(i) are currently deployed to resist rear dormers. Such application of current RBKC policies is seen by the majority of local residents as restricting the scope of house-owners to make use of attic space, while doing very little to 'preserve or enhance' the character of the StQW part of the Oxford Gardens Conservation Area, where the rear of properties has limited historical or architectural merit. Varying this RBKC policy in respect of the StQW part of the Oxford***

*Gardens CA is seen by the StQW Forum as having no material impact on the character of the conservation area, given the number and extent of rear dormers already in place.*

*2b) within those streets (and part streets) within the StQW part of the Oxford Gardens Conservation Area covered by Article 4 Direction 46/62 (as listed below) the introduction of rooflights to front main roofs facing the highway will continue to be resisted.*

*Balliol Road Nos 1-25 odd 2-26 even inclusive*

*Finstock Road Nos 3-41 odd and 2-42 even inclusive*

*Highlever Road Nos 1-127 odd, 2-88 even inclusive*

*Kelfield Gardens Nos 15-21 odd, 22-33 odd, 2-46 even inclusive*

*Kingsbridge Road 1-23 odd inclusive*

*Oxford Gardens Nos 135-185 odd, 122-174 even inclusive*

*St Helens Gardens 21-51 odd inclusive*

*St Quintin Avenue Nos 1-31 odd inclusive*

*Wallingford Avenue Nos 1-69 odd, 2-74 even inclusive*

*Reasoned justification: Rooflights are 'permitted development' and do not normally require planning permission. The above policy reflects a continued application of current RBKC policies in conjunction with an existing Article 4 Direction. A proliferation of rooflights in front roofs is acknowledged as a characteristic of conservation areas 'at risk' through insufficiently robust policies and/or lack of enforcement. The policy is included in the StQW Plan to provide clarity on an issue on which house-owners have been confused.*

*2c) for ground floor rear/side extensions within the StQW area, where the original external side passage is incorporated into the body of the house, to make no requirement under RBKC Policy CL2(d)(i) for a small setback in the rear facade, so as to allow for full width sliding doors.*

*Reasoned justification: there is a requirement in the updated RBKC Policy CL9 for rear extensions and modifications to existing buildings to be 'subordinate to the original building to allow the form of the original building to be clearly understood, and to reinforce the character and integrity of the original building, or group of buildings'. This policy is sometimes applied to planning applications for rear extensions in the Oxford Gardens CA, with case officers requiring a small (100mm) setback in the rear facade at the line of the original side passage to the house. The practical consequence is to prevent the use of full width sliding doors. This RBKC policy is seen by local residents as an unnecessary and inappropriate restriction in a neighbourhood where the rear ground floor facades of dwellings are not visible from public viewpoints, nor from shared garden squares, and are in any event of modest historical and architectural merit. Varying this RBKC policy in respect of the StQW part of the Oxford Gardens CA is seen by the StQW Forum as having no material impact on the character of the conservation area.*

*2d) for ground floor rear/side extensions within the StQW area, where the original external side passage is incorporated into the body of the house, to resist proposals which exceed 3m in height at the party wall, and/or with a roof slope greater than 45 degrees, and/or which infringe on Rights of Light of neighbouring properties.*

*Reasoned justification: to provide clarity and a set of parameters on a type of house extension widely undertaken within the StQW neighbourhood, without encroaching on Permitted Development rights.*

*2e) to resist the introduction of non-permeable surfaces to front garden areas (above size limits within Permitted Development rights) other than for the replacement of existing main paths or where approved hard standing for parking, and crossovers is already in place.*

*Reasoned justification: while this proposal largely duplicates RBKC Policy CE2(f) there is little evidence that residents are aware of the latter policy, or that it is enforced. StQW Policy 2e) above is therefore proposed in order to provide greater clarity of wording and to increase levels of awareness of the detriment created by unrestricted hard surfacing of former front gardens, these being a very common feature of the StQW neighbourhood as compared with other parts of the Borough. Section 3 of this Plan gives more detail of flood risk in the area.*

*2f) where planning permission is needed, to require minor alterations to house fronts including the siting of bike or bin stores, and the addition of external security bars or shutters, satellite dishes, flues, visible gas meter boxes on front facades, to be visually discreet.*

*Reasoned justification: to maintain the appearance of house fronts as an important characteristic of the conservation area.*

*2g) within those streets (and part streets) of the Oxford Gardens Conservation Area covered by Article 4 Direction 46/62 (as listed under 2b above) to cease to resist minor adjustments to roof ridge heights for insulation improvements, where this does not materially affect the appearance of the roof or create an uneven roofline in a terrace, and to require main chimney stacks to be retained.*

*Reasoned justification: to allow house-owners to improve the energy efficiency of their homes, provided that this does not materially affect the character of the conservation area.*

## **ACTIONS**

*2i) to ask RBKC to progress alongside the adoption of this neighbourhood plan the adoption of a consolidated and updated Article 4 Direction to cover specified streets (and part streets) in the StQW area. Such a Direction to remove permitted development rights for:*

- alterations to roofs and facades facing the highway (as currently removed by the present Direction 46/62)*
- alterations to elevations facing the highway (as currently removed by the present Direction 46/62, with clarification as to whether the Direction applies to front boundary walls)*
- the painting of original brickwork on elevations*
- provision or extension of a hard surface (as currently removed by the present Direction No.69) for those addresses defined in that Direction)*

*Such a Direction to be extended to the following streets in relation to roof alterations only*

- Pangbourne Avenue*
- Bracewell Gardens (east side)*

*2(ii) To urge RBKC to take prompt enforcement action on any infringement of Permitted Development rights in respect of a) front boundary walls and b) outbuildings in rear gardens, including the requirement that all uses of the latter be ancillary to the main dwelling.*

# Environment

## Objective 3 *Protect the environmental quality of the neighbourhood's wide streets and public realm including views within and from the conservation area*

3.1.1 The distinctive spatial quality of the St Quintin Estate, with its wide tree-lined streets and pavements, is a feature much appreciated by local residents. The area differs significantly from many other residential areas the borough (such as Hillgate Village and much of Chelsea) which were built at an earlier time and where streets and pavements are narrow and views and aspects much more confined.

3.1.2 This section of the St Quintin Estate was built to an overall planned layout and with a limited menu of house types. The 'railway cottages' in the Oakworth Road area also share a common architectural design. This enhances the homogenous quality of the neighbourhood, and forms the main justification for its status as a conservation area.

3.1.3 The scale of the housing (generally two storey) coupled with the width of the streets allows for long vistas and open skies, again relatively unusual so close to the centre of London. The area still feels close to the outer edge of London, reflecting the fact that it was open fields until the start of the 20th century, with the large green space of Wormwood Scrubs and the playing fields of Latymer School to its west. The St Quintin Estate is sometimes describes as having a 'suburban' feel, although it is close to the heart of London.

3.1.4 The 1979/90 Conservation Area Proposal Statement (while now out of date and to be replaced by a Conservation Area Appraisal) remains a document formally adopted by the Council and still referred to in decisions on planning applications. But its status in policy terms has been unclear to the public. It is referred to in reports determining planning applications as 'policy guidance', whereas the original document states that passages in **Super bold type** signify '*specific policies and proposals which the Council will implement using its development control powers.*

3.1.5 It seems clear that planning legislation subsequent to 1990 means that the CAPS cannot now be treated as a statement of planning policies and only as 'guidance'. In the same way, it is accepted that the Council's new series of Conservation Area Appraisals will not set policy, and will only provide guidance on the interpretation of the RBKC Core Strategy in relation to the conservation area in question.

3.1.6 The StQW Plan, in contrast, *can* set policy in relation to the neighbourhood area, subject to conformity with the Basic Conditions. Hence this Plan aims to protect as far as possible the environmental characteristics of the of the StQW area.

3.1.7 Policy CL1 in the RBKC Core Strategy already requires *all development to respect the existing context, character, and appearance, taking opportunities available to improve the quality and character of buildings and the area and the way it functions, including being inclusive for all.* Policy CL1(e) *resists development which interrupts, disrupts or detracts from strategic and local vistas, views and gaps.* RBKC policy CR1 requires *a well connected, inclusive and legible network of streets to be maintained and enhanced.*

3.1.8 The StQW Plan cannot directly impact on planning matters beyond the designated neighbourhood area. But the StQW Forum would wish the final Plan to include policies in relation to harm to views within and the setting of the Oxford Gardens Conservation Area, to mirror at local level RBKC Core Strategy policies CO5, CR1, CL1, and CL2. The Forum is also mindful of Policies 7.4, 7.6 and 7.7 of the 2011 London Plan, on tall buildings.

3.1.9. Hence proposed StQW Policy 3a, as set out below, is intended to support the RBKC Core Strategy and the Council's Supplementary Development Plan on Tall Buildings. The StQW Forum fully understands that the StQW neighbourhood plan will not form part of the Local Development Framework for Hammersmith and Fulham, but hopes that it may influence the preparation of a revised LBHF Core Strategy (and in particular a revision of the White City Opportunity Area Framework) as likely to be undertaken by the Council administration elected in May 2014.



*Image of approved Imperial West development, on completion, with StQW neighbourhood shown in left /centre of the image.*

### **Outdoor advertising**

3.2.1 The StQW neighbourhood is vulnerable to continued efforts by major outdoor advertising companies to increase the number, height and size of outdoor advertising structures along the A40(M) Westway. Policy 3b is designed to ensure that outdoor advertising impacting on views within and from the conservation area, and creating associated light pollution, is adequately controlled.

### **Sense of enclosure**

3.3.1 The RBKC Core Strategy includes a policy CL5(c) on *sense of enclosure*. This is a relatively unusual policy for a local planning authority, and was introduced to reflect the fact that the Borough is very densely built, with residential land values that encourage property owners to expand buildings in terms of height and/or into every possible part of a site or landholding. This can cause serious harm to the amenity of neighbours, even if required standards of daylight/sunlight and privacy are met(just) by the proposal.

3.3.2 The StQW neighbourhood is less at risk to such practices than some parts of the Borough, although there have been issues over building heights on the eastern side of Latimer Road and on a refused application for the development site at Crowthorne Road. Within the neighbourhood, it is particularly rear gardens that can be at threat of a significantly increased 'sense of enclosure', many such gardens being small. Hence StQW Policy 3e) below is proposed, referring specifically to impact on rear gardens.

### **Street Trees**

3.4.1. The street trees within the StQW area were cited by many respondents to the StQW Survey as an important and valued featured of the neighbourhood. RBKC has a general policy CR6 protecting trees and landscape and a Tree Strategy, and the Forum wishes to add a policy more specific to the StQW area (see Policy 3d below).



## **Risk of flooding**

3.5.1 Counters Creek runs directly beneath the StQW area and is one of the ‘lost rivers’ of London. This former river and its large catchment in north west London form part of Thames Water’s sewage network, draining all surface water from buildings and roads, as well as draining waste water from properties.

3.5.2. Heavy rainfall in July 2007 caused widespread sewer flooding in parts of RBKC (the Holland Park area) and RBKC homes were also flooded during storms in 2004, 2005 and as a result of other events. Thames Water has found that a loss of green space together with a high density of basements close to the sewer line, means that certain properties in the Borough are at a particularly high risk of flooding.

3.5.3 In addition to installing anti-flood devices (known as ‘FLIPs’) at properties at the highest risk of flooding, Thames Water has now agreed with OFWAT an investment programme of a further £26m over the next 2 years. The longer term plan is for a new storm relief sewer for the catchment, to be delivered between 2015 and 2020.

3.5.4 London has a combined sewerage system which means that rainwater run-off from streets and buildings goes into the same sewers as foul flows from sinks and toilets. As more and more areas of the capital are paved over, rainwater that used to soak away into the ground now flows straight into the sewerage network. This means that when it rains heavily, the sewerage network quickly fills and can become overwhelmed by the combination of sewage and rainwater. An analysis of aerial photography over the last 40 years suggests that around 17% of green space has been lost in the Counters Creek catchment.

3.5.5 This is the background to the proposed StQW Policy 2(e) on resisting non-permeable surfaces in front gardens (see under Section 2 on Conservation)

## **ENVIRONMENTAL QUALITY: DRAFT POLICY StQW 3**

***3a) where development impacts on the character and appearance of the StQW part of the Oxford Gardens Conservation area, to require that proposals reflect and respond to the ratio of existing building height to the unusually wide streets and pavements of the streets of the St Quintin Estate.***

***Reasoned justification: to preserve or enhance the particular characteristics of the StQW part of the Oxford Gardens Conservation Area***

***3b) where development impacts on views and vistas within and from the StQW neighbourhood, to resist proposals which cause harm to, or fail to preserve or enhance, the character of the StQW part of the Oxford Gardens Conservation area.***

***Reasoned justification: to preserve or enhance the particular characteristics of the StQW part of the Oxford Gardens Conservation Area and in particular the relatively open skylines and vistas of the St Quintin Estate.***

***3c) to ensure that proposals for outdoor advertising (including associated structures) within or in the immediate surroundings of the StQW neighbourhood, do not cause harm to, or fail to preserve or enhance the character of the StQW part of the Oxford Gardens Conservation Area.***

***Reasoned justification: to respond to a threat specific to the neighbourhood, given its proximity to one of the major routes into London and the fact that this route (Westway) is elevated, resulting in pressures for advertising structures of 30m or more in height. To preserve or enhance the particular characteristics of the StQW part of the Oxford Gardens Conservation Area and in particular the relatively open skylines and vistas of the St Quintin Estate.***



**3d) to maintain present numbers and quality of street trees, as a highly valued feature of the StQW neighbourhood.**

***Reasoned justification: to protect a characteristic feature of the StQW part of the Oxford Gardens Conservation Area and one highly valued by local residents.***

**3e) to require that new development creates no harmful increase to the sense of enclosure of rear gardens of houses within the StQW part of the Oxford Gardens conservation area.**

***Reasoned justification: to protect and enhance a particular feature of the character of the StQW part of the Oxford Gardens Conservation area, and one providing significant amenity value to its residents.***

## **ACTIONS**

3i) to participate in the RBKC North Kensington Streetscape Advisory Group and to encourage a high quality public realm for the neighbourhood, in terms of surface treatments (paving), street lighting, and street furniture.

3ii) to continue to lobby the Westway Trust to reduce its reliance on income from the leasing of outdoor advertising sites, and not to renew existing leases when these expire.

3iii) to monitor damage to street trees and ensure swift replacement of any that do not flourish.

3iv) to liaise with RBKC and telecoms companies on the location of any telecoms equipment not requiring planning permission, so as to mitigate the impact on the conservation area.

3v) to maintain contact with Thames Water on its programme of flood prevention for the Counters Creek catchment area.

# Open spaces

Objective 4 ***Protect and enhance our open spaces, gardens and trees, both private and public, bringing 'backland' green areas into community use where ownership permits***

4.1.1 The main public open space within the StQW neighbourhood is Kensington Memorial Park (sometimes known as St Marks Park). This park includes a well-equipped childrens playground and some informal sports pitches. The very large area of Wormwood Scrubs lies immediately to the north-west of the neighbourhood boundary, and the smaller Little Wormwood Scrubs to the north. These amenities are important to residents in the area and are extensively used for dog-walking, and for formal and informal sports and recreation.

## The St Quintin 'backland sites'

4.1.2 The neighbourhood also includes a number of private open spaces of significant size. These are a particular feature of the layout of the St Quintin Estate. At the time the estate was built (1880-1910) these open spaces were designed as an integral part of what was then a new community. Before the creation of municipal government bodies with responsibilities for leisure and recreation, these pieces of 'backland' behind each terraces street were used for differing types of sporting or recreational use, administered by clubs and societies of different forms.

4.1.3 During the 2nd World War, several of these open spaces were used as allotments. In the post war period a number became waste ground as London was rebuilt. London County Council development plans of that period designated these sites as 'private open space'. In the subsequent decades, a number of these backland sites have been lost to new development. The current position on each site is set out later in this section.

4.1.4 The Oxford Gardens Conservation Area Proposals Statement notes the important part played by these pieces of land, in these terms:

*'The designers of both estates (referring to that developed by Henry Blake and that by St Quintin family) took care to incorporate open space in the street layout. Road widths, gaps, return frontages, backlands and gardens combine to create a distinctive open character for the area. In the St Quintin Estate the use of space has produced a pleasant 'suburban' enclave within a busy high density part of the city.*

*Backlands formed by the enclosed terraces of the St Quintin Estate exist at Highlever Road, Barlby Road and Kelfield Gardens.*

**Some leisure and recreational activities have made good use of these spaces and proposals to develop them for housing will not be permitted'.**

4.1.5 The introduction to this chapter of the CAPS document explains that statements made in **super bold type** (as above) '*signify specific policies and proposals which the council will implement using its town planning development control powers*'.

4.1.6 As pointed out in Section 3 above, the status of 'policies' set out in the Council's Conservation Area Policy Statements has changed since these documents were first adopted by the Council. The adoption process does not meet current more extensive requirements for any part of a statutory Local Development Framework. Nevertheless, the Council has continued to rely on the CAPs documents as policy guidance when determining planning applications.

4.1.7 At borough level, RBKC Core Strategy Policy CR5 states that the Council will *resist loss of private communal open space and private open space where the space give visual amenity to the public*. There is also a specific policy CD31 on backland sites, 'saved' from the previous Unitary Development Plan, which remains extant and which states:

*To resist the development of backland sites if:*

- a) there would be inadequate vehicular access, or*
- b) the amenity of adjoining properties would be adversely affected, or*
- c) there would be a loss of open space, or*
- d) the character of the area would be harmed.*

4.1.8 This neighbourhood plan strongly endorses and supports both these policy statements.

4.1.9 A further specific neighbourhood policy is proposed below in relation to the backland sites of the St Quintin Estate. These sites, we believe, are unusual in the borough in that they are private land originally designed specifically for shared community use. While not of identical status (in planning or legal terms) they can be compared with the 100 and more garden squares which are a key feature of the heritage of Kensington & Chelsea. Regrettably the status of the backland sites on the St Quintin Estate has not been protected in the same way as the Borough's other garden squares, by either the Town Gardens Protection Act 1863 or by the Kensington Improvement Act 1851.

4.1.10 Only two of these backland sites currently remain in any form of communal use. Local residents consider it important to protect these, and to find ways of bringing other such sites back into uses which serve a local need for recreation and outdoor activities, or for valued public services such as social care or health provision.

### **West London Bowling Club**

4.2.1. This site remains the closest to the original vision and layout of the St Quintin Estate. The land is in the ownership of the West London Bowling Club (a limited company established in 1932). The freehold title includes a restrictive covenant limiting use to a bowling green or recreation ground. With the agreement of the Club's directors, the StQW Forum successfully applied in December 2013 for this site to be placed on the RBKC Register of Community Assets. This means that a 6 month moratorium would be triggered should the site be put up for sale for development, allowing time for alternative propositions to come forward from the local community. Given its history and current use, this Plan proposes that this piece of land be designated as a Local Green Space, under paragraph 77 of the National Planning Policy Framework.

4.2.2 The Club's current directors have no intention of putting the site on the market, and the StQW Forum has been working successfully with the club to relaunch its activities and to increase its membership, following a period of closure in the winter of 2013/14.

### **Nursery Lane site**

4.3.1 This 0.48 hectare site (behind Brewster Gardens, Dalgarno Gardens and Highlever Road) has a complex planning history. Annex C to this Plan sets out the detailed basis on which the StQW Forum considers that this site should be designated as Local Green Space. This view follows a detailed discussion on the site at the Forum's public meeting on May 29th 2014.

4.3.2 The owners of the land are members of the Legard family, who inherited a number of sites from the St Quintin family who originally laid out the streets and buildings of the St Quintin Estate. An application by the

family to build housing on the estate was refused, on appeal, in 1981. In April 2014 the site was marketed by agents acting for the Legard family as being potentially suitable for private residential development.

4.3.3 As stated in the RBKC Oxford Garden CAPS policy (see paragraph 4.0.4 above), additional housing has not been seen by the Council in the past as an appropriate use for this or other remaining backland sites. This StQW Plan shares this view and identifies the Latimer Road area, and the Crowthorne Road site, as being more suited for housing use and as locations which can contribute to the Borough's targets for market and affordable housing (see under Objective 11 below). Annexe C to this Plan sets out the detailed justification for the Nursery Lane site to be designated as Local Green Space.

### **St Quintin Childrens Centre**

4.4.1 This backland site (behind Highlever Road/Kingsbridge/Wallingford and St Quintin Avenue) has been developed as a childrens centre by RBKC. This low rise development is a valued educational facility in the local and wider area, and is protected by RBKC Policy CK1 on social and community uses. It would also be protected by StQW Policy 4a) below. The loss to development of this original backland space has added to the need to protect the few remaining such sites.

### **Methodist church site**

4.5.1 This is a smaller backland site, behind Wallingford Avenue and Kelfield Gardens. It is owned by the Methodist Church and remains largely as open space, with a building housing the New Studio Pre-school. The site has very limited development potential, given its size and constrained access. It is protected as a social and community use under RBKC Policy CK1, and it is proposed that this site should be third within the StQW neighbourhood to be designated as Local Green Space.



*Backland site owned by the Methodist Church, behind Kelfield Gardens, St Quintin Avenue, and Wallingford Avenue, proposed in this Plan for designation as Local Green Space*

### **Blake Close**

4.6.1 The backland site behind Barlby Road was used as allotments during the 2nd World War and subsequently zoned as 'private open space' by the London County Council in the London development plans of the 1950s. The Blake Close housing scheme of 23 dwellings was subsequently approved and built on the site by Notting Housing Trust, with the larger family homes targeted towards the statutory homeless. Hence there is no scope for this site to return to its original use as private green space for communal use. This again increases the importance of protecting other remaining backland sites.

## Little Wormwood Scrubs

4.7.1 This public open space lies immediately to the north of the StQW boundary and is much used by local residents. It is a large open area consisting of amenity grassland, semi-improved neutral grassland, scrub, scattered trees and woodland. There is an adventure playground with an adjoining One o' Clock club on the west side of the park and a smaller toddlers playground located on the east side.

4.7.2 The land is currently held in trust by the London Borough of Hammersmith and Fulham but is managed under a 20-year lease by the Royal Borough of Kensington and Chelsea. It is a Site of Nature Conservation Importance, and was allocated funding for improvements under the 2008 Mayor of London's Priority Park programme. As it lies just outside the boundary of the StQW neighbourhood, no policy proposals are included in this Plan.



The triangle of open space at St Quintin Gardens (junction of Barlby Road, North Pole Road and St Quintin Avenue). A traffic island, but one well maintained by RBKC.

## The RBKC Tree Strategy

4.8.1 The Council's Tree Strategy seeks to give greater emphasis to the relationship between trees in the Royal Borough and the built and historic environment. It sets out policy guidance on publicly owned trees (including the street trees which are an important feature of the StQW neighbourhood). Because of risks of subsidence in the clay soil of the StQW area, the street trees are lopped and pruned on a regular cycle, to reduce the risk of falls.

4.8.2 A survey in the late 1980s showed that 72 per cent of the Borough's trees were in private ownership. As the Tree Strategy states *'These trees make a significant contribution to the visual appeal and amenities of the Royal Borough and are an important habitat for wildlife'*. Those within Conservation Areas are afforded legal protection under the 1990 Town and Country Planning Act. Either permission is needed or a notification of intent must be submitted to the Council before a tree in a Conservation Area is pruned or cut down.

## Draft Policy StQW 4

***4a) Reflecting their origins as communal sports and recreation areas, to protect from inappropriate development the remaining 'backland' private open spaces in the neighbourhood, by designating as Local Green Space (under paragraph 77 of the National Planning Policy Framework) the following pieces of land:***

- *Land north of Nursery Lane, behind Brewster Gardens, Dalgarno Gardens, and Highlever Road.*
- *Land behind Kelfield Gardens, Wallingford Avenue, and St Quintin Avenue*
- *Land behind Highlever Road, Pangbourne Avenue, and Barlby Road (WLBC site)*

*Reasoned justification: while residents in the StQW neighbourhood have adequate access to public open space and outdoor recreational opportunities (Memorial Park, Little Wormwood Scrubs), local people also greatly value the backland sites and private open spaces in the area, for their quality as a 'green lung', their biodiversity, and the sense that they bring of a part of London originally planned to give a suburban rather than an 'inner city' feel. RBKC and national planning inspectors recognised this amenity value in the 1970s and 1980s. Given that a number of backland open spaces on the St Quintin Estate have been lost to development, the remainder are in increased need of protection. Reasoned justification in relation to the Nursery Lane site is detailed in Annexe C to this Plan.*

*4b) To maintain amenity and biodiversity by requiring that mature trees on larger private open spaces within the StQW neighbourhood are protected to the same extent as those in the Borough's private garden squares.*

*Reasoned justification: RBKC Policy CR6 covers protection of trees generally, in public and private open space. The RBKC Tree Strategy recognises the important amenity and biodiversity value of trees within the Borough's 100+ private communal gardens and garden squares. Policy 4b seeks to achieve the same level of protection for those remaining backland sites on the St Quintin site originally set aside for amenity space and communal enjoyment.*

#### **Actions**

*4i To ask RBKC to ensure that Tree Preservation Orders in place in relation to mature trees on the Nursery Lane site are complete and up to date.*



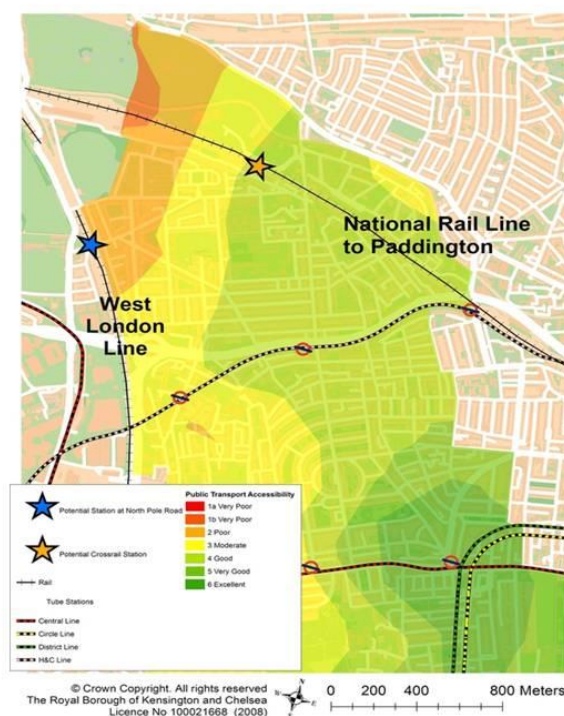
# Transport

**Objective 5 *Reduce traffic queues, noise and disturbance in the neighbourhood and improve access to public transport and pedestrian/cycle connectivity to the south and west.***

5.1.1 There are limits to the extent to which policies proposed in this Draft Plan can help to achieve the above objective. All policies proposed in the Plan need to relate to *'the development and use of land'* within the neighbourhood area. It so happens that a key development site within the StQW neighbourhood (at 301 Latimer Road) has a significant potential part to play in transport strategy for the wider area. It is on this basis that this section of the Plan is included.

5.1.2 Responses to the StQW Survey showed that transport and traffic issues are a real concern for local residents, shops and businesses. The issues which this Plan seeks to address are as follows:

- Levels of accessibility to public transport are lower in the StQW neighbourhood than for most parts of the borough, and comparatively low for inner London
- In responses to an open question *'what are the main problems in the area for motorists?'* the impact of worsening traffic queues at the junction of North Pole Road and Wood lane were referred to in 31% of responses to the StQW survey.
- There is local concern that the cumulative impacts of proposed new developments in the White City, Old Oak, and Kensal Rise Opportunity Areas, on traffic congestion along the A219 Woods Lane/Scrubs Lane, are not being properly reflected in first stage masterplans , nor in the forecasts and consultancy reports submitted by developers as part of individual planning applications.
- North Kensington is unusual for an Inner London Borough in having no Underground, Overground or mainline railway station, north of Latimer Road Underground on the Hammersmith & City Line. Access to any form of rail transport is therefore comparatively poor at present. The StQW Plan seeks to address this.



*Public Transport Accessibility Levels in North Kensington and StQW area*

5.1.3 In terms of public transport accessibility, the north-western part of RBKC has lower PTAL levels than in the rest of the borough. RBKC Core Strategy policies require any new development generating a high number of trips to be located in areas with public transport accessibility levels of 4 or above and where there is sufficient public transport capacity

5.1.4 While the StQW area is surrounded by Opportunity Areas on three sides (only one of which falls within RBKC) the neighbourhood itself has PTAL scores of only 2 (poor) and 3 (moderate). The road network in the area places huge pressures on the A219 Wood Lane/Scrubs Lane as the primary north/south route, and on the North Pole Road/Wood Lane junction as the only exit point to the west along a one mile length of Scrubs Lane/Wood Lane between the Harrow Road and the Holland Park roundabout (while there is access to Westway from Wood Lane, this requires travelling along Wood Lane to reach it).

#### **North Pole and Wood Lane road junction**

5.2.1 Long queues at this junction, causing traffic to back up (simultaneously) along Barlby Road, St Quintin Avenue, Bracewell Road, Brewster Gardens, and Latimer Road, are a regular feature of the day (mainly between 1600 and 1900 hours) and often at non-peak times. This situation has worsened significantly since the opening of the Westfield shopping centre and the additional traffic that this has created along Wood Lane. The developments at Imperial West, the St James site and the Stanhope scheme at the former BBC TV Centre will add to this congestion, given that all will be using Wood Lane as their only access and exit point.



Traffic backing up in St Quintin Avenue, Highlever and Barlby Road, waiting to enter North Pole and to then exit at the junction onto Wood Lane. A regular occurrence in the Conservation Area.

5.2.2 The longer term plans for the Old Oak Opportunity Area will similarly have a major impact on traffic in this part of London, with proposals intended to bring 55,000 jobs and 24,000 homes to the area.

5.2.3 Traffic flow at the North Pole Road/Wood Lane junction is highly sensitive to volumes of vehicles in each direction. The traffic lights are controlled by Transport for London by a SCOOT system which uses sensors embedded in the road to detect traffic and to adjust automatically signal timings according to the relative demands on each approach.

5.2.4 The StQW Forum has corresponded and met on site with traffic engineers from TfL to ensure the system is operating as intended. The basic problem remains that this is a single exit point to the west from a large part of Kensington.

5.2.5 A detailed Strategic Transport Study was carried out by TfL in 2011 as part of the White City Opportunity Area Planning Framework (GLA/LBHF). This noted the existing congestion at junctions on the

A219 Wood Lane/Scrubs Lane and made forecasts for the impact of new developments in the Opportunity Area. In this document, and in the WCOAPF itself, various interventions and mitigation measures are proposed. These involve some junction re-design and encouragement of behavioural change to alternative transport modes.

5.2.6 At present there are no proposals for significant changes or additions to the road network in the area. A north/south 'local route' through the development sites in White City East is shown on plans in the 2013 WCOAPF adopted by LBHF (labelled as 'White City Lane'). Imperial College now owns the sites both north and south of the Westway, and has advised that this route will be for access to their campus only and not for through traffic. An east/west route north of the boundary of Wormwood Scrubs is shown in the 2013 Mayoral 'vision' for Old Oak, but this joins the existing Scrubs Lane and will significantly add to, rather than reduce, north/south traffic on Scrubs Lane /Wood Lane.

5.2.7 The proposed developments in White City East (most of which have now received planning permission) include 50,000 sq.m of additional retail floorspace and 1,100 housing units at Westfield 2, and a further 1,000 housing units at the Stanhope BBC development. Imperial West is a 22 acre site with Wood Lane as its sole road access. Housing developers St James have submitted their application for 1,500 homes on the former M&S site, again with Wood Lane as the sole point of road access.

5.2.8 These major developments cannot but generate significant extra traffic over the next decade, albeit that LBHF planning policies limit residents parking for new developments (both onsite and for on-street permits). Pressures on the existing public transport network (bus, rail and Underground) will also be acute.

5.2.9 Residents and businesses in the StQW area have concerns that because the A219 Scrubs Lane/Wood Lane runs along the borough boundary between RBKC and LBHF, insufficient attention is being paid by each local planning authority to the cumulative impact of current and approved developments. In terms of traffic forecasts submitted by developers and their consultants, their impact assessments apply primarily to the single development which is the subject of the planning application. It is not in the interests of such developers to commission thorough and objective studies of the cumulative impact of neighbouring developments, when such data will only damage prospects for their own proposals.

5.2.10 By London and national standards, the wards within which the StQW neighbourhood sits are characterised by comparatively high levels of households with no access to a car or van (58.7% for the former St Charles ward and 60.2% for the former Notting Barns, as compared with a borough average of 56%). Those residents who believe in the virtues of public transport, and have no car as matter of choice, are frustrated to find that much of the Conservation Area is now blighted by queues of near stationary traffic at peak times.

5.2.11 Planning authorities at higher levels are doing too little to incentivise 'behavioural choice' towards alternative forms of transport in this part of London. Local people can only hope that the neighbourhood planning system will begin to provide a counterweight, and will allow for alternative transport solutions (such as proposed below) to gain weight within the Local Development Frameworks of RBKC and LBHF.

## **Cycling**

5.3.1 Kensington & Chelsea is not considered by London cyclists to be a leading Borough in terms of cycling policies (a comment from the London Cycling Campaign). The council committed in 2014 to devoting more attention to fulfilling its role in providing dedicated routes within the London Cycling Grid.

5.3.2 The consultation on proposals by the Mayor of London for an [east/west segregated Cycle Super Highway](#) has prompted local interest in recent months (the consultation closed on November 9th 2014).



The StQW management committee is evenly divided over whether this proposal is a good or bad idea, with questions over whether cyclists would use the Westway section of the proposed route in preference to established back routes through North Kensington. **Views and comments would be welcomed as part of the consultation on this Draft Plan.**



Visualisation of the Westway section of the proposed East West Cycle Superhighway, looking west towards the StQW area

5.3.3 Published plans for the Westway section of the Superhighway show the segregated route using one line of the eastbound carriageway, with cyclists ascending and descending via the 'On' ramp at the Westway elevated roundabout (on Wood Lane). The idea of adding heavy cycle traffic at this already congested junction is causing some local concern, particularly in terms of that part of the traffic that will in future be heading northwards towards the transport interchange and new development at Old Oak. Hence this Plan suggests that the development site at 301 Latimer Road should be looked at as a possible entry/exit point for northbound cycle traffic (see section 12 on Managing Development).

5.3.4 While stations for 'Boris Bikes' have recently been installed at locations closer to the StQW neighbourhood area, there are none as yet within its boundary. It is understood that no further expansion of the scheme is planned. Lobbying for an additional locations within the StQW area is one of the 'actions' proposed in this Plan (see below).

### Bus routes

5.4.1 Respondents to the StQW survey generally commented positively on the frequency and reliability on bus transport, probably reflecting a London-wide view that bus services have improved across the capital over the past decade. But there remain local concerns over existing bus routes, and in particular that there is no direct bus route to and from Kensington High Street.

5.4.2 Local ward councillors lobbied Transport for London in 2014 to vary bus route 452 to provide a direct link between Dalgarno Gardens and Notting Hill/High Street Kensington. TfL rejected the case for such a

change, citing insufficient demand. TfL consider that routes 7 and 70 provide sufficient links for residents in the area wishing to travel south. The position will be reviewed as developments in the Kensal Opportunity Area come on-stream, but these remain many years away.

5.4.3 Meanwhile the Labour Group on the Council is promoting plans for a tram link from Ladbroke Grove (Sainsbury site) to Old Oak. This would be an alternative to a Crossrail station at Portobello North, a proposal made by RBKC but one which is now seen as having little prospect of becoming reality.

5.4.4 The current bus services through the neighbourhood area are routed along Bramley Road/St Marks Road, and Barlby Road/North Pole Road. Bus stops are therefore some distance away from homes, especially for older people (including residents of Evelyn Fox sheltered housing in Kingsbridge Avenue). Bus stops are also some distance (a 6-8 minute walk) from the office buildings at the southern end of Latimer Road. This contributes to the high vacancy levels for office premises at this location.

5.4.5. It is difficult to see how these deficiencies in current routes could be mitigated. Routing buses down Oxford Gardens and along Latimer Road is a possible option but one that would be highly unwelcome to Oxford Gardens residents and would cause problems with the drop off and pick up of children at Oxford Gardens Primary School.

## **London Underground**

5.5.1 Access to the Underground network from the StQW neighbourhood is also relatively poor, the nearest station being Latimer Road (confusingly, not located on Latimer Road but 500m away on Bramley Road). This station is on the Hammersmith & City Line. While frequency of trains has improved since Circle Line trains began running to Hammersmith, this station does not give direct access to the West End.

5.5.2 Transport for London bases its catchment areas for Underground stations on a 900m radius and this distance is currently exceeded for most of the StQW neighbourhood area. The nearest Central Line station to the StQW neighbourhood (at White City) looks close on a map but in reality is a 12-20 minute walk for most StQW residents, and for the businesses in Latimer Road. This results from the physical barrier created by the West London railway line. Walking times to the Central Line will reduce following the construction of the planned underpass between Latimer Road and Imperial West.

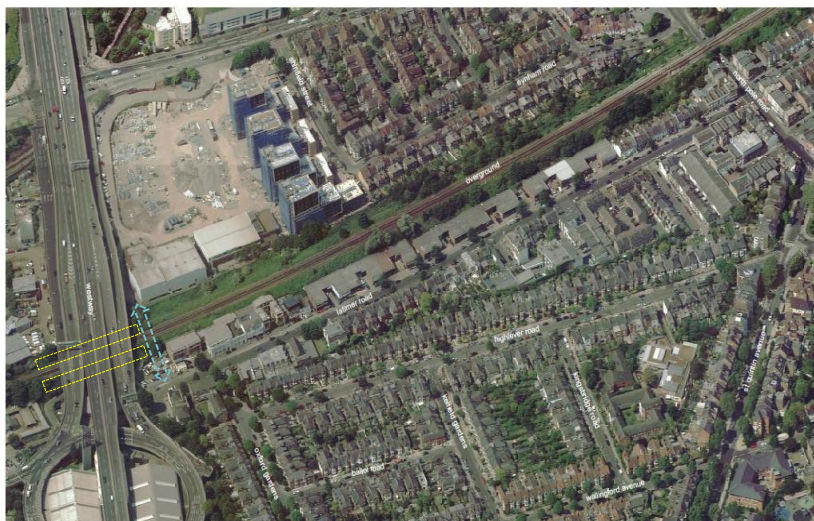
## **London Overground and Rail**

5.6.1 There is no mainline railway station within easy reach of the StQW neighbourhood area. While RBKC has made a strong case for a Crossrail station at Kensal/Portobello North, to improve PTAL levels for the north of the borough, this now appears to be an unlikely prospect.

5.6.2 Transport for London and Network Rail have been [consulting in late 2014 on three options](#) for an Overground interchange at the proposed HS2/Crossrail hub at Old Oak. This consultation closes on 24th November 2014. The third of these options (Option C) involves locating an additional West London Line station at Hythe Road (off Scrubs Lane). While such a station would still be some 12-15 minutes' walk from the northern part of the StQW neighbourhood, it would be closer than the existing stations at Willesden Junction and Shepherd's Bush Green. Hence the StQW Forum supports the case for Option C, as do LBHF and the Friends of Wormwood Scrubs.

5.6.3 In this wider context, the StQW Forum has been promoting the case for a second additional Overground station on the West London Line, to replace the original Wormwood Scrubs and St Quintin station originally located at Latimer Road (and subsequently North Pole Road) up until the 1940s. A replacement station at North Pole has been part of the RBKC Core Strategy since 2011 (Policy CT2b).

5.6.4 The proposal in this Plan locates the proposed Overground station a few hundred metres to the south and adjacent to the planned pedestrian/cycle underpass between Imperial West and Latimer Road. This proposal is seen as a supportive modification to RBKC Policy CT2b, and avoids the risks of resident objections (on noise grounds) to living next to station platforms, otherwise likely to come from those living in North Pole Road, Eynham Road, and Bracewell Roads.



Aerial view of suggested site for additional Overground station at 'Western Circus' showing location of platforms (yellow) and underpass (pale blue)

5.6.5 This location has also been promoted by the West London Line Group (a body with a history of successful lobbying for additional stations and capacity on this section of the London Overground). The West London Line Group has christened this location as 'Western Circus' and has lobbied for the proposal as part of a petition to Parliament on a range of matters in the Hybrid HS2 Bill.

5.6.6 Transport for London argue that an Overground station at this location would not serve a sufficient catchment area and would not tie in well with current bus routes. It is not clear why a parallel case has been accepted for additional stations on the East London Line, at much shorter intervals between stations. Nor whether TfL are taking sufficient account of the scale of future development in White City East and at Old Oak.

5.6.7 The point about the lack of a bus route serving a Western Circus Overground station has some validity, albeit that the present bus stop at North Pole Road (bus routes 7 and 70) is only 6 minutes walk from this location. On the western side of the WLL line in Hammersmith, a bus stop on the north/south 220 bus route would be only 2-3 minutes away.

#### **Pedestrian and cycle connectivity: the proposed underpass between Imperial West and Latimer Road**

5.7.1 As acknowledged in the RBKC Core Strategy, pedestrian and cycle connectivity between the StQW part of North Kensington and adjoining neighbourhoods is poor in many respects. This was not the case when the St Quintin Estate was first laid out in the 19th century, at which time Latimer Road provided a well used north-south thoroughfare from North Pole Road to Holland Park Avenue.





Suggested location for Westway Circus Overground station, beneath Westway elevated roundabout. The land on each side of the track is already in TfL ownership, and a new £4m underpass is due for construction to the immediate left of this image, allowing for a single ticket office.

Costs of Imperial Wharf station (added to the line in 2009) were £7.8m, met by LBHF, RBKC, TfL and developers.

5.7.2 The railway line (West London Line) runs along the borough boundary and has for a 150 years created a major barrier to east/west movement. This will change with the construction of the new underpass between Latimer Road and Imperial West, for which a planning application was submitted by Imperial College in September 2014.



Image of Latimer Road entrance to proposed underpass. The £4m funding for the project forms one of the S106 'community benefits' from the Imperial West development.

5.7.3 In terms of north/south connectivity through the StQW neighbourhood, St Helens Gardens and Bramley Road provide the main (and only) pedestrian cycle route through the area. Previous significant north/south through routes such as Latimer Road routes were cut off when the original local street pattern disappeared with the construction of the Westway. This had some advantages as well as disadvantages in that the current street pattern, in that the result has been to:

- concentrate more footfall onto St Helens Gardens and help to ensure the survival of this neighbourhood shopping parade.
- leave the streets running west of St Helens Gardens (comparatively) free of cars and cycle traffic and hence more peaceful.

5.7.4 The improved pedestrian/cycle routes through the new Kensington Academy and Leisure Centre site, and the Silchester Estate development (when completed) are supported by the Forum.

## TRANSPORT AND TRAFFIC: DRAFT POLICY StQW 5

**5a) to promote the case for a new Overground station on the West London Line (additional to any interchange at Old Oak) located beneath the Westway elevated roundabout and combined with the pedestrian/cycle underpass between 301 Latimer Road and Wood Lane (Imperial West).**

*Reasoned justification: this is a supportive modification to RBKC Core Strategy Policy CT2(b) and would improve PTAL levels and reduce traffic congestion within the StQW neighbourhood. RBKC Policy CT2(b) is 'to promote the creation of a new station on the West London Line at North Pole Road'.*

**5b) to reserve the balance of the site at 301 Latimer Road, for a 3 year period from the adoption of this Plan, to allow possible future infrastructure proposals to come forward, related to either a) the Mayoral proposals for a Westway section of the east/west Cycle Superhighway or b) a ticket office and entrance to Overground platforms at an additional station on the West London Line (see also Section 8 on Managing Development).**

*Reasoned justification: this site has remained undeveloped since the late 1960s and its reservation for a further period is designed to enable alternative transport options to come forward. The land is ultimately owned by Transport for London, leased to RBKC for amenity and community uses, and sub leased from the Council to the Westway Trust. While there has been an earlier planning approval for a mixed use development on this site (not pursued), the Trust advise that it has no firm proposals as at September 2014 and is being consulted on the above policy proposal.*

**5c) In the context of RBKC policy CR1 on 'street network' to maintain the tranquillity of streets in the StQW neighbourhood area and resist any changes to the street network which will result in vehicular through traffic compromising amenity in the this part of the Oxford Gardens Conservation area.**

*Reasoned justification: there is concern, particularly from residents of Oxford Gardens and the surrounding streets, that the character of this part of the Oxford Gardens CA may be harmed at a future date by efforts to re-connect the historic north-south street beneath the Westway. Residents wish the StQW Plan to ensure that the application of RBKC Policy CR1 takes account of neighbourhood views when and if any such proposals come forward*

**5d) Where significant development is proposed within the StQW neighbourhood, to require that it be demonstrated that this will not result in increases in traffic congestion or on-street parking pressure, to an extent that would fail to preserve or enhance the character of the Oxford Gardens Conservation Area.**

*Reasoned justification: it is acknowledged that this is a near duplication of RBKC Policy CT1 b). Its proposed inclusion in the Plan is to signal to residents and businesses in the neighbourhood area that such a policy is in place borough-wide, and will be taken into account when development proposals are considered.*

### ACTIONS

*5i) to ensure that TfL undertakes regular monitoring of traffic delays at the junction of North Pole Road and the A219 Scrubs Lane/Wood Lane and pursues any mitigation measures to reduce current delays*

*5ii) to ask RBKC, LBHF and Transport for London to undertake a comprehensive further forecast of the cumulative impact of proposed developments along the A219 Scrubs Lane/Wood Lane arising from approved and proposed major developments in the White City Opportunity Area and the Old Oak Opportunity Area.*

*5iii) to support the proposals for a pedestrian/cycle underpass between Latimer Road and Imperial West, subject to details of the design and 24/7 monitoring of CCTV cameras.*

*5iv) to support any further proposals to vary north/south bus routes, to provide a direct bus connection between St Marks Road/Barlby Road/North Pole Road and Kensington High Street.*

*5v) to promote the introduction of electric car point within the StQW neighbourhood area.*

*5vi) to lobby for an additional 'Boris Bike' station, located within the StQW neighbourhood area.*

*5vii) to support 'Option C' of the three options proposed by Transport for London for an Overground interchange at Old Oak.*

## Safety and tranquillity

Objective 6 ***Maintain safety, security and tranquillity in the area, contributing to a continued low level of burglary and street crime***

6.1.1 Many responses to the StQW Survey demonstrated the importance that residents attach to the comparative quietness and tranquillity of most streets in the area. Most residents feel safe and secure to walk the streets of the area in the hours of darkness, although the southern end of Latimer Road and that part of Freston Road between Latimer Road Underground Station and Oxford Gardens have been identified as feeling threatening. The pedestrian/cycle route across Westway Trust land behind Oxford Gardens is also seen as a route to avoid after darkness.

6.1.2 The Safer Neighbourhood Team's current priorities for the former Notting Barns and St Charles wards are to prevent:

- Anti Social Behaviour by youths causing noise and nuisance, and in general
- Motor vehicle crime
- Drugs and alcohol misuse
- Burglary

6.1.3 In the Latimer Road part of the Freston Road/Latimer Road Employment Zone, regular attempts to burgle office buildings have been a longstanding problem. The 2013 report on Enterprise in the borough, commissioned by the council from Roger Tym, notes that *At Freston Road and Latimer Road safety was again raised as an issue, with a number of the properties being 'off the beaten track' with little activity on evenings and weekends. Businesses feel that this encourages criminal activity.* One of the reasons why this Plan proposes more mixed use development in Latimer Road, with residential above commercial, is to have more 'eyes on the street'.

6.1.4 In terms of the Edwardian streets built by the St Quintin family, housing is terraced as well as set back from the street with front gardens. This provides a combination of sufficient privacy from passers-by, with the reassurance that streets and pavements are overlooked by several households at any one location. Levels of street crime are therefore low.

6.1.5 Backland developments, away from passing cars and pedestrians, have specific security issues which require careful design. This applies both the housing and non-residential development. Blake Close has experienced problems of anti-social behaviour and fly-tipping.

6.1.6 This Plan is not proposing any further residential development of backland sites, for this and other reasons.

6.1.7. In terms of street crime and anti-social behaviour in the StQW neighbourhood, a more active police presence has been needed at times to address issues of youths congregating in St Helens Gardens. But such interventions seem to have worked. The shops in North Pole Road have had to take measures to address problems arising from large groups of young people dispersing at the end of the school day. North Pole Road has late night shops and takeaways, and can feel threatening in the hours of darkness. CCTV coverage in this area has been strongly recommended by a number of shopkeepers in the parade, in the StQW survey on local shopping parades.

6.1.8 The neighbourhood has seen a growing trend in recent years for house-owners to introduce new security measures at their own properties. These include security lighting in porches and front and rear gardens, and higher front garden walls. A new trend has been the introduction of high front railings or

fences, with security doors or gates fitted with entryphone systems, and the letter box moved to the outside wall. These measures are designed to create a secured front area, which will often be now paved over and in some cases part filled with bin stores and/or bicycle store.

6.1.9 These changes in the way that house-owners choose to use their front garden space are having a visible impact on the appearance of the conservation area, as well as on water run-off into the sewer system. While the StQW Forum respects the reasons why house-owners wish to make such changes, there are concerns as to the extent to which this trend may become uncontrolled. It is not clear how many residents are fully aware of RBKC policies and Article 4 Directions on external alterations to the street-facing facades of properties in the Conservation Area. Where unapproved works are carried out, this places an extra enforcement burden on the council. This Plan addresses these issues under Objective 2 on Conservation (see above).

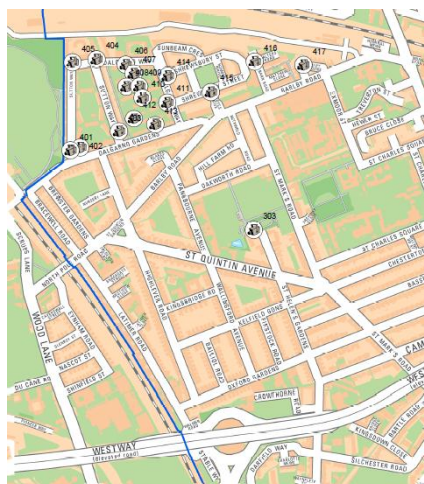
### **What role could CCTV play in the StQW neighbourhood?**

6.2.1 RBKC Council operates a network of CCTV cameras in North Kensington, as part of its measures to prevent crime. The Council's Community Safety Team is a joint partnership with the police, over seen by the Borough's Community Safety Partnership.

6.2.2. At present, all the CCTV crime prevention cameras in North Kensington are located north of Dalgarno Gardens, i.e. just north of the StQW boundary. Responses to the StQW Survey have identified two further areas where residents, shopkeepers, and businesses consider that monitored CCTV coverage would contribute to crime prevention and a reduction in anti-social behaviour. These are:

- North Pole Road, with its cluster of late night shops and problems of supervision of school pupils at the end of the school day..
- The southern end of Latimer Road, with its history of burglaries of office buildings and the location for the eastern entrance/exit to the proposed underpass between Latimer Road and Wood Lane.

6.2.3 Within the new underpass, five CCTV cameras will be provided as part of the S106 Agreement between Imperial College and LBHF. The StQW Forum has been seeking answers (without success) on whether this will be monitored by the College or via the Bi-Borough CCTV control room managed by LBHF. These cameras will still leave un-monitored the critical area of the southern end of Latimer Road, leading eastwards into Oxford Gardens and northwards up Latimer Road.



*Location of existing cameras within North Kensington crime prevention CCTV network*

## **SAFETY AND TRANQUILLITY: DRAFT POLICY STQW 6**

***6) (No spatial planning policies currently proposed. See below for proposed actions).***

### **ACTIONS**

6i) to work with the RBKC Community Safety Partnership/Safer Neighbourhoods Board in maintaining the current low levels of crime and disorder in the neighbourhood.

6ii) to support the Local Policing Teams working in the St Helens and Dalgarno wards

6iii) to comment on planning applications where it is considered improvements can be made in terms of 'Safer by Design'.

6iv) to lobby RBKC to add additional CCTV cameras to the current North Kensington network, in North Pole Road and at the southern end of Latimer Road.

6v) to support residents of Blakes Close in achieving adequate access control, improved lighting, management and maintenance so as to prevent fly-tipping and discourage anti-social behaviour on the private access road and parking areas within this housing development.



# Shopping

Objective 7 *Safeguard the commercial viability of our shopping parades as sources of local convenience shops and services that residents need*

7.1.1 At the time the St Quintin Estate was laid out, the St Helens Gardens shopping parade opposite the church was designed to provide for the majority of shopping needs of local residents. As in many parts of London, the type of shop has changed over the years and has become more limited and less useful in meeting the convenience shopping needs of the immediate neighbourhood.

Street Nos	53	55	57	59		61	63	65	67	69	71	73	
1920s	Chemist Finn	Fish-monger Benzie	Grocer W.J. Harris	Draper Prynn & Harris		Baker Checkley & Waite	Grocer Brigg	Green-grocer	Butcher	Gents Outfitters & P. Office	Sweets & Stationery Evison	Dairy	Office Southcott Builders
1950	Chemist Finn	Fish-monger Benzie	Grocer W. Harris	Hair-dresser Braham Laundrette		Baker Partridge	Grocer Whitbread	Green-grocer Clyde's	Electrician Benstead then Ken England	Hosier & P. Office Carter	News-agent Fennimore, then Moulton & Clarke	United Dairy	
1970s-1990s	Chemist Hair-dresser	Butcher Lopez Delicaté	Off-licence Threshers	Laundrette	KELFIELD GARDENS	Baker Tomlin	Haber-dashery and wool	Mini-market	Iron-mongers Ken England then Stones	P. Office	News-agent	Dairy	Insurance brokers
2005	Hair Dresser - Tony "Hair & Tanning"	Delicaté Lussman	Off-licence Threshers	Flower Shop Orlando		Bakers St Helen's Bakery	Dry Cleaner	Mini-market	Work-clothes	Dry Cleaner	News-agent J&F News	Cafe Addis	Aquatics Pottery
2012	Ladies clothes (bespoke) The State of Grace	Delicaté St Helen's	Interior decoration Violet and George	Estate Agent		Bakers St Helen's Bakery	Dry Cleaner Sana	Mini-market Baz	Toy Shop Dot closed	Dry Cleaner	Vet	closed	Pet Care
ST HELEN'S GARDENS													
Kelfield Court					St Helen's Church and Church Hall								

7.1.2 RBKC Core Strategy policy CK2 resists loss of A1 retail use in neighbourhood centres. This has in the past given some planning protection to the two shopping parades in St Helens Gardens and North Pole Road. But given the changes in shopping habits affecting all small high streets, coupled with the 2008-12 recession, this has not stopped shops in the StQW neighbourhood from becoming financially unviable.

7.1.3 Hence both these shopping parades have seen vacant shop units stand empty for months and in some cases many years. This not only reduces the local retail offer but affects the whole street by giving it an appearance of neglect and decay. The 2013 RBKC Monitoring Report includes the St Helens Gardens and North Pole neighbourhood shopping centres amongst those in the Borough 'requiring close monitoring', with vacancy rates of 20% or more. The current position as at late 2014 is set out below:

**18 North Pole Road** Vacant for 15 years. StQW Forum has encouraged owner to re-market the tenancy, taking into account the results of the StQW Shopping Survey.

**20 North Pole Road** Former Kensington Gourmet – vacant for some years but due to re-open as a health/wellbeing centre subject to planning permission

**Corner shop on North Pole Road and Brewster Gardens** - shop closed but now in use as an office with shutters drawn down at all times and hence appearing vacant. Planning application for use as a restaurant and takeaway (A3/A5) refused by RBKC in autumn 2014.

**73 St Helens Gardens (former Addis Cafe)** - cafe closed. Ground floor has recently been part refurbished. Not clear as yet what use will emerge.

**67 St Helens Gardens (former Dotty Dots toy shop)** – vacant for 18 months. Attempts to contact owner have had no response.



St Helens Gardens - northern section

7.1.4 The Government has already introduced changes (from May 2013) which allow buildings with A1, A2, A3, A4, A5, B1, D1 and D2 uses to change use for a single period of up to two years to A1, A2, A3 and B1 uses. However, the two year limit is a disincentive to significant investment by a building owner in changing the layout or fabric of the premises.

7.1.5 Given the context of long-term vacant shops in both parades, this StQW Draft Plan proposes permanent increased flexibility in allowing change of use between A1, A2, A3, B1, D1 and D2 use classes, subject to amenity considerations (e.g. noise nuisance for neighbours from plant and AC extracts). While this would not conform with current RBKC Policies CK2 and CF 3d, it should be recognised that the Government has been consulting (late 2014) on changes to the Use Class Order to form a wider retail class, containing shops, banks and estate agents etc, but excluding betting shops and pay day loan shops. These measures are expected to come into effect in Spring 2015.

7.1.6 As the CLG consultation states, *this will expand the flexibility for businesses to move between premises such as a shop to what would have been an A2 use such as an estate agent or employment agency without the need for a planning application. This will support local communities and growth by enabling premises to change use more quickly in response to market changes, reducing the numbers of empty premises that can contribute to blight in an area.* The StQW Forum therefore considers its proposed policy 7a below to conform with the direction of Government policy.

### St Helens Gardens - ideas for the future

7.2.1 This shopping parade was originally laid out and designed to be the heart of this part of the St Quintin Estate, with its local church and shops. It retains some of the atmosphere of a 'village centre', as noted in responses to the StQW Survey.

7.2.2. The visual appearance of St Helens Gardens has been much improved as a result of refurbishment works carried out by the landlord of 3 shop units in the southern section. These improvements came at a price, in that they were progressed through a series of planning applications involving reductions in retail floorspace and residential conversions to the back part of the shop units. Hence the resultant shop areas are small and with minimal storage by the standards of most retail units. One tenant of the new conversions (vintage and bespoke clothes at No.53) closed down in 2014. The premise has recently been re-let as an opticians/eye care outlet.

7.2.3 In 2013 the St Helens Residents supported an application for change of use from A1 to A2 (estate agents) of a key corner shop in St Helens Parade, on the basis that this activity replaced a vacant unit and was bringing footfall and vitality to the street. RBKC committee approval was eventually given to the

application (contrary to officer advice). The proposals included a new florists kiosk on the forecourt of the shop, as an element of A1 use.

7.2.4 This outcome is seen by local residents as a success in bringing life to the street, and an example of how Borough-wide planning policies need to be tailored at neighbourhood level to reflect local context and responsiveness to market forces. Paragraph 17 of the National Planning Policy Framework supports this approach.



*St Helens Gardens - southern section*

*Shop units converted with new shopfronts (with some loss of retail space to residential)*

7.2.5 As a local shopping parade, St Helens Gardens is more attractive than North Pole Road, with wide pavements and (private) forecourts in front of the shops. In recent years, several St Helens summer festivals have been organised by local councillors and the church, with a temporary road closure to allow the street are to be used as a pedestrian area.

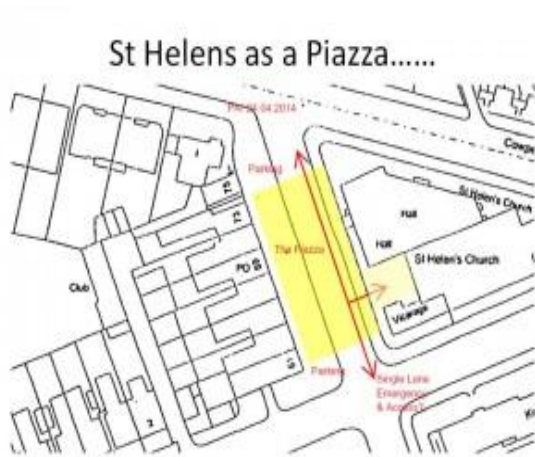
7.2.6 The Forum has been investigating the scope for experimenting with more frequent temporary road closures, initially in the summer months, to allow the area to be used as a local 'pedestrian piazza'. Discussions have been held with London Farmers Markets, on the possibility of a weekend Farmers Market in this space. Consultation with RBKC, the shopkeepers and residents in the street is ongoing.



Image of a 'pedestrian piazza' in section of St Helens Gardens outside the church. Road closures in this section involve only a minor detour for traffic and the street is not a bus route.

Scope for more frequent closures and installation of shared surface will be pursued via the RBKC North Kensington Streetscape

7.2.7 If experiments with such use of this section of the street proved successful, the next step would be to replace the road surface with an attractive 'shared surface', revise the car parking and delivery arrangements, and install a means of road closure such as rising bollards. The StQW Forum will be participating in a new North Kensington Streetscape Advisory Group, set up by the Council, which will start work in late 2014.



*St Helens Gardens - plan of possible longer-term road closure*

## North Pole Road

7.3.1 North Pole Road is a less attractive environment as a shopping parade. The pavements are narrower and there are regular traffic queues, not helped by cars and vans routinely ignoring parking restrictions. At the end of the school day, the pavements become very crowded with school pupils using the fast food shops and convenience stores. Several shopkeepers have had to place a limit of the number of young customers in the shop. There are also problems of litter from the fast food shops, at this and other times of day.



*North Pole Road shopping parade*

7.3.2 For the shops and services in the street, availability of nearby parking is important if they are to survive. The chemists in North Pole Road is a much valued local facility which provides an extensive repeat collection and delivery service to elderly housebound patients and also delivers urgent medicines. Lack of '10 minute shopper parking' is an issue, given the limited number of Pay and Display spaces in the area. As a result of high levels of construction activity in the neighbourhood (basements and renovations) many of the P&D spaces are occupied all day by construction vehicles and builders vans.

7.3.3 The one longstanding pub in the area (The North Pole, on which site a pub had stood since 1839) was lost to a Tesco Metro in 2012, despite a local campaign to save it. The street already had three convenience stores and a butcher at that time, all of which have since remained trading.





*A Tesco Metro has replaced the former North Pole pub*

## Results of the StQW Shopping Survey and Residents Survey

7.4.1 In early 2014, shopkeepers in the two main local parades were asked what they wanted to see happen as part of the StQW Neighbourhood Plan, and what type of shop they felt might survive best in each street. Residents were also asked a series of questions on local shopping, as part of the StQW Survey.

7.4.2 Taking these two sets of responses into account, the following themes emerge:

### North Pole Road

- shopkeepers did not want more aggressive parking enforcement, but would welcome more spaces for short-term 'shoppers parking'. Additional Pay and Display spaces could be provided at St Quintin Gardens (north side of Barlby/St Quintin Avenue, Highlever 'triangle'). Free '10 minute parking' would be seen as good thing if this could be adequately monitored and enforced.
- CCTV would be welcome in North Pole Road, to address risks of burglary, late night crime, and litter from school pupils using the fast food shops (followed up as an 'Action' in this Plan).
- more litter bins should be provided (reports of some being removed and not replaced)
- matching resident views on '*shops we would like*' against shopkeeper views on '*what shops would survive in this parade*' the main candidates to emerge were that of an upmarket delicatessen, hardware/basic DIY goods, a good baker, and a fishmonger.
- in terms of services, a restaurant and a health/wellbeing outlet offering podiatry, chiropractor, physiotherapy were seen as both needed and viable. (The latter proposition is being progressed in relation to one of the currently vacant units).
- vacant units, with dilapidated shopfronts have a depressing effect on the parade, as does fly-posting under the railway bridge, and a fly tipping 'hotspot' (old furniture/domestic goods) at the corner of Brewster Gardens. The STQW Forum will continue to raise these issues with building owners and the Council.

### St Helens Gardens

- a similar request from shopkeepers for less parking enforcement or more availability of short term shoppers parking , if the shops and cafe in the parade are to remain viable
- the importance of the 'school run' (in relation to Bassett House School and Oxford Gardens Primary) in bringing potential customers from a wider area to the street twice a day.
- reliance from shopkeepers/services on '*regular customers who know us*' as opposed to passing trade (this is matched by survey responses from residents saying they shop and use services locally because of a neighbourly village atmosphere and '*supporting local shops*', with a willingness to pay more than at nearby larger supermarkets.

- empty shops and dilapidated shop fronts have the same damaging effect as in North Pole Road
- in matching resident views with what was felt to be viable, the candidates to emerge included a brasserie/restaurant, hairdresser/beautician, butcher, and laundrette (there are two dry cleaners in the parade at present).

7.4.3 This evidence and analysis demonstrates that the local shops and services survive (some with difficulty) within a commercial eco-system that is sensitive to quite small changes. Were a school to re-locate, or parking restrictions to increase, some businesses might be forced to close. Similarly, quite small measures to improve availability of parking, improve the appearance of the parades, or introduce new elements (such as the arrival of the florists stall at St Helens Gardens) can have a significant positive effect.

7.4.4 Policies on 'the development and use of land' in a neighbourhood plan can have only a limited impact here. The 'Actions' in this Plan are also designed to improve the viability of local shopping parades and improve their physical environment. Equally important is the ongoing work by the StQW Forum and St Helens Residents Association to encourage absentee landlords of vacant units to take action to refurbish and market their premises. With the Forum's expanding membership and network of contacts, there is growing chance of bringing together building owners/landlords and prospective tenants through small-scale and very local interventions.

#### **Draft Policy StQW 7**

***7a) Within the StQW neighbourhood area and its two neighbourhood shopping parades (as defined in the RBKC Core Strategy) of St Helens Gardens and North Pole Road, to allow permanent change of use between A1, A2, A3, B1, D1 and D2 use classes subject to amenity considerations.***

*Reasoned justification: Levels of vacant shop units in both shopping parades have demonstrated over recent years that greater flexibility on use classes is needed. The above proposed policy may be overtaken by the introduction by Government of new use classes, and is meanwhile included in this Plan as a means of making permanent current flexibilities introduced by Government in May 2013, for a maximum 2 year period.*

#### **Actions**

***7i) To request RBKC to review the balance of residents and P&D (pay and display) parking bays in the immediate vicinity of North Pole Road and St Helens Gardens, with a view to creating more short-term parking for shoppers and users of local services.***

***7ii) As part of the North Kensington Streetscape Review, to work with the RBKC Transport and Market Management Departments to provide for temporary road closures in the northern section of the St Helens Gardens shopping parade, to create a pedestrian area suitable for permitted market trading and outdoor consumption of food and drink.***

***7iii) Through participation of the StQW Forum in the North Kensington Streetscape Advisory Group, to follow up on other potential improvements to the shopping parades in the neighbourhood, as identified via the StQW Survey and retail questionnaire/interviews.***

***7iv) To continue to contact owners and managing agents of vacant shop units to encourage refurbishment and re-letting, alert them to new flexibilities on change of use, and identify potential matches with resident aspirations for new uses.***



# Latimer Road

**Objective 8 Maintain (and in some parts of the neighbourhood) widen the mix of uses to keep buildings occupied and in active use**

*'For the oldest office stock in the north of the (Freston Road/Latimer Road) area, viability is marginal, with quoting rents just under £180 per sq m. Going forward, these rents may not be enough to sustain the existing stock. They are certainly not enough to support new development (para 4.56).*

*As we have seen, the offices to the north of the zone are not well occupied and command low rents. The root of the problem is the area's poor environment and difficult access, and the lack of a critical mass of office property. If this does not change, these offices may not be an economically sustainable land use in the long term' (para 4.58).*

Extracts from Peter Brett/Roger Tym RBKC Commercial Property Study 2013, commissioned by the Council.

8.1.1 As explained in the introduction to this Plan, while investment in housing refurbishment is pouring into the StQW neighbourhood, very little investment is being made in commercial and retail property. Section 7 above looks at the two shopping parades, where shops and services are at risk of becoming unviable. This section of the Plan looks at Latimer Road, a location where potential remains unfulfilled, buildings are outdated and under-occupied, and little investment is being made.

8.1.2 Change is needed for Latimer Road. This part of the neighbourhood is not currently contributing to sustainable development. This Draft Plan identifies a way forward, based on a more tailored application of NPPF, London Plan and RBKC Core Strategy planning policies.

8.1.3 **RBKC planning officers have made clear that the StQW policies proposed in this section of the Draft StQW plan are seen as conflicting with RBKC Core Strategy Policy CF5<sup>2</sup> and thus failing to meet the requirement for 'general conformity' with a 'strategic policy' in the Borough's Local Plan. The StQW Forum has been separately advised by a leading QC that there are 'good prospects that the desired flexibility of use in Latimer Road would meet the general conformity test'. It is therefore particularly important that local residents and businesses provide feedback on this section of the Draft Plan during the 6 week consultation stage, prior to the review of the Plan by an independent Examiner.**

## **Latimer Road – a street which has not worked as part of an Employment Zone**

8.2.1 There are two strands to the StQW Forum's case for a rethink on planning policies for Latimer Road

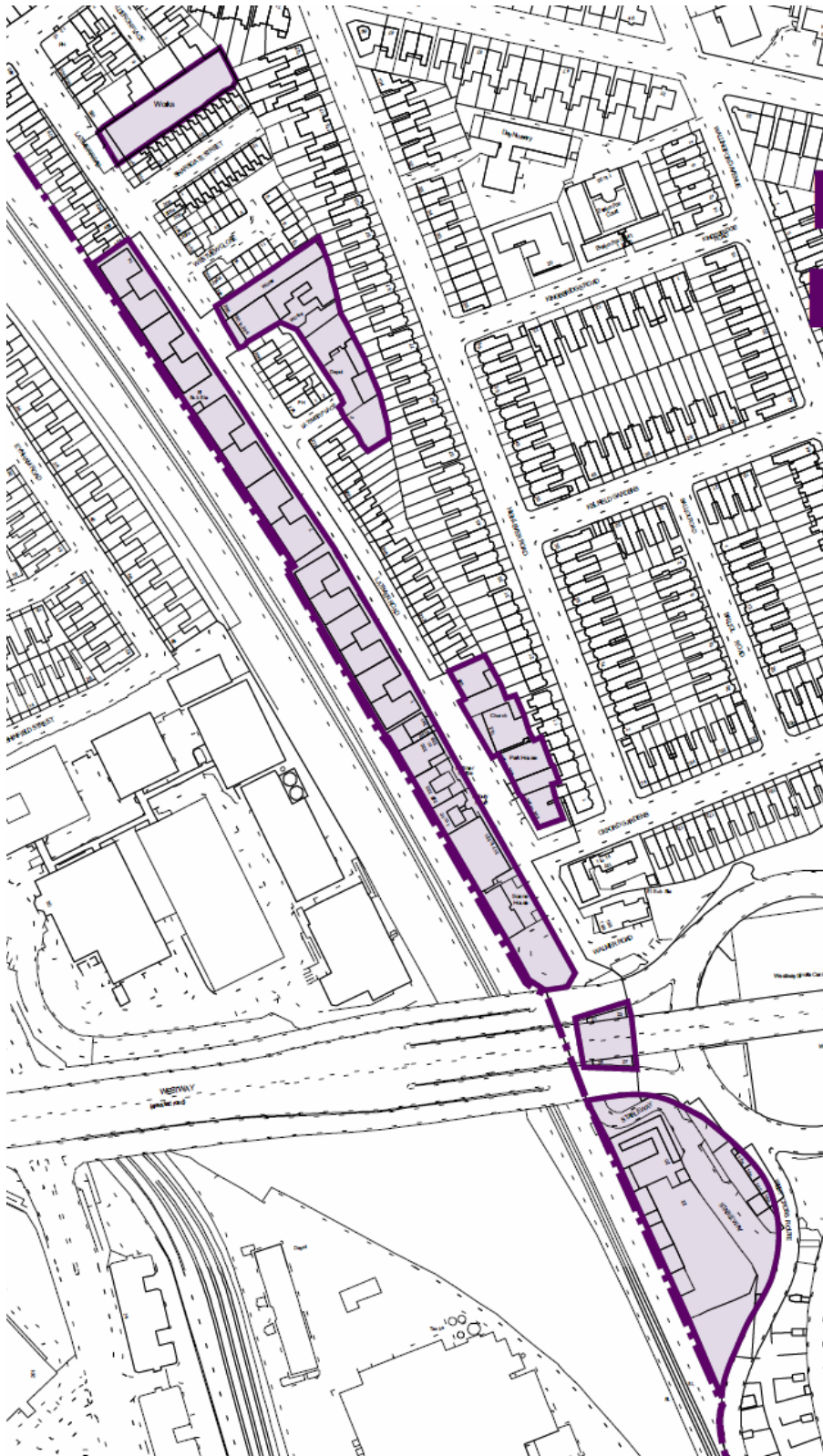
- current RBKC policies are not proving successful in their own terms - in retaining BI office use within an Employment Zone. The cluster of office buildings at the southern end have low levels of occupancy and most have experienced periods of part vacancy, lasting several years, in the past decade. Lettings are at rent levels unviable for future investment.
- Equally importantly, the street is not offering what either office staff or local residents want to see within the immediate neighbourhood (and which the StQW area currently lacks). These are places to eat out at lunchtime or in the evening, have a cup of coffee or a glass of wine, buy fresh produce and bread, find interesting shops, galleries, or entertainment, and generally socialise. Local people would also like to see in Latimer Road some housing opportunities that are 'more affordable' than in the surrounding streets.

8.2.2. This section of the StQW Draft Plan addresses these two issues.

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<sup>2</sup> RBKC Policy CF5 is the main Core Strategy policy for the allocation and protection of business space across the Borough.

8.2.3 Latimer Road forms part of the Freston Road/Latimer Road Employment Zone, as defined in the 2010 RBKC Core Strategy and the previous Unitary Development Plan. Until 1996, the west side of the street formed part of the much larger Wood Lane Employment Zone in Hammersmith & Fulham, prior to boundary changes.



*Map of the Latimer Road sections of the Freston Road/Latimer Road Employment Zone (source RBKC Unitary Development Plan).*

*Note that the employment areas are in 4 separate sections, interspersed with housing. The street has always been a 'mixed use' street.*

*Continued mixed use is proposed in this plan, with housing above as well as alongside employment uses.*

8.2.4 During the 1970s and 80s, LBHF was encouraging light industrial and warehousing in the Wood Lane Employment Zone. In the LBHF part of Latimer Road, approval was granted to a small number of office buildings at the southern end, and to a warehouse and light industrial development, on the western side of the street.

8.2.5 During this period, the east side of Latimer Road (within Kensington & Chelsea) was *not* part of an Employment Zone. It remained (as it has always been) in mixed use with housing alongside workshops and some offices, light industry, two pubs, and a tabernacle building. In 1992 the Council approved a development of 20 housing units behind the east side of Latimer Road (now Westview Close).

8.2.6 It has proved hard to trace why, when RBKC inherited the western side of the street in 1996, the Council chose to create a joint Freston Road/Latimer Road Employment Zone? There had been no road connection between Freston Road and Latimer Road since the construction of the Westway in the late 1960s. Nor is it clear why three separate sections of the east side of Latimer Road were added into this joint Zone?

8.2.7 There are only three Employment Zones designated in the Borough (Lots Road, Kensal, and Freston Road/Latimer Road). There are many other parts of the Borough with scattered office and commercial uses and with larger concentrations of such use than in Latimer Road. Such areas have not been designated as Employment Zones.

8.2.8 The reality for Latimer Road has been that as a result of its location and characteristics (poor access to public transport, isolated as a commercial area) this part of the joint Freston Road/Latimer Road Employment Zone has never flourished. Much the same was true of Freston Road for a time, before its better transport links and borough-wide pressure for office space helped the area to take off commercially, with substantial new office buildings constructed with large floor plates. While the Freston Road area has in the last decade attracted major companies such as Chrysalis, Accessorise, Monsoon, Talk Talk, Winsor and Newton, and Stella McCartney, Latimer Road presents a different picture and has been undergoing continued decline.

8.2.9 The reduction in demand for small office units, and the increase in numbers of self-employed working from home, has made Latimer Road an unattractive offer within the commercial market, even at rents well below levels predicated by business rates. Much of the small office market that Latimer Road used to serve has migrated to serviced business units, including those in LBHF, that have better transport links.

8.2.10 For local residents, Latimer Road provides some useful facilities (motor repairs, plumbing supplies) but has long been seen as an unsuccessful part of the neighbourhood. The southern end has an abandoned feel, prone to litter, graffiti and fly tipping. Security of office premises is an issue (see Section 6 of this Plan). The location is avoided by many residents in the hours of darkness.

8.2.11 The St Helens Residents began conversations with building owners in 2012, looking for ways of reviving Latimer Road. Potential was seen for attracting more creative and retail businesses, to join those already based in the street (Designers Guild) and for encouraging the arrival of a wider range of activities and building uses.

8.2.12 At this time (autumn 2012), RBKC published an Issues and Options paper, seeking views on policy changes to be included within a revised 'Enterprise' Chapter of the 2010 Core Strategy. St Helens Residents Association submitted a response, setting out the problems of the street and asking for changes in planning policy. This response questioned the benefits of Latimer Road remaining part of the Freston Road/Latimer Road Employment Zone, and went on to suggest that if the street was to remain with this designation RBKC

Core Strategy Policy C5 needed some relaxation. The modification suggested in 2012 for this Policy was as follows:

Policy CF5(a)i could for example include additional wording to offer some controlled flexibility on change of use, as shown in bold below:

**a. protect very small and small offices (when either stand alone or as part of a larger business premises) throughout the Borough.....**

*except where:*

**i. the office is within an employment zone and is being replaced by a light industrial use, workshop or other use which directly supports the character and function of the zone, including alternative uses reflected in a Supplementary Planning Document or Neighbourhood Plan for the area in question.**

8.2.13 At that time, the St Helens Residents Association (with support from building owners and businesses in Latimer Road) was already looking to a neighbourhood plan as a means of fine-tuning RBKC planning policies in relation to the street. Council officers who came on a walkabout of the area seemed open to this idea.

8.2.14 This element of the Council's Partial Review of its Core Strategy then stalled, and the Council concentrated on building evidence for its response to the Government's January 2013 proposals to allow change of use from office to residential floorspace. In the event the Council succeeded in gaining a borough-wide exemption from this Government policy, during the initial 3 year trial period in which it has applied. **As a result, the current national flexibilities on change of use from office to residential floorspace do not apply within the Borough.**

8.2.15 The StQW Forum fully supports the overall direction of the case the Council has continued to make in seeking large-scale exemption from Government plans to make permanent the flexibilities on change of use, from office to residential. The gulf between values of residential and commercial floorspace in RBKC is so great that the Borough would lose swathes of office space were the current exemption to be removed in full.

8.2.16 However, the Forum does not feel that the Council can continue to justify seeking exemption for every street in the Borough - given evidence of locations where restrictive planning policies are proving unsuccessful. To do so would be to delay re-investment in outdated office buildings, accelerate decline and vacancy levels, and obstruct NPPF priorities. Nor do we feel that the Council should resist fine-tuning of its current strategic Policy CF5, where the case for doing so is evidenced and brought forward through a neighbourhood plan supported by local people.

8.2.17 The designation by RBKC of Latimer Road, historically a mixed use street, as an Employment Zone has not achieved the intended policy outcomes and the narrow restriction of permitted uses to B1 only has had a negative impact. Inclusion of the eastern side of the road has not brought significant new employment. The only significant new development in recent years (290-294 Latimer Road) was approved in 2010 and replaced a former carpet cleaning premise with a mixed use scheme providing 883m sq of B class employment space. It took the inclusion of 12 market residential flats (no affordable housing) to make the development viable, and in practice some of this new employment space remained unlet for a long period.

8.2.18 Many parts of the Borough have significant 'scattered' office and business floorspace in mixed use streets which are *not* part of designated Employment Zones. Indeed, this geographic characteristic of the RBKC office market is the main factor that has justified the 'borough-wide' exemption from Government measures on change of use.

8.2.19 Mixed use streets are seen by the Council (rightly) as one of the attractions of the Borough. As stated in Paragraph 2.2.38A of the Partial Review document adopted by the Council in October 2013 *'Another important characteristic that is also part of this legacy is the interspersal of small scale studios, shops, pubs and other mixed uses within the residential areas. This adds vitality and variety to the street scene – mixed*

uses are not confined only to town centres or employment zones in the borough. It is this vitality that is now lacking in Latimer Road.

**8.2.20 As part of the policy proposals in this Plan, the StQW Forum recommends that Latimer Road should cease to be designated as part of a combined Freston Road/Latimer Road 'Employment Zone' and that new StQW policies as proposed in this Plan should be applied to use classes in the street. Should an Examination of the StQW Draft Plan conclude that it is not possible to de-designate as part of adoption of a Neighbourhood Plan, this step should be taken via the forthcoming Partial Review of the business/enterprise chapter of the Core Strategy, with the new StQW policies being applied in the meantime.**

8.2.21 The review and 'healthcheck' of this Draft Plan (undertaken by a leading planning QC) has confirmed that development plan designations (such as the 'countryside' designation) can be varied via a neighbourhood plan - subject to the 'general conformity' test. Such a variation is what this Plan seeks to achieve in relation to Latimer Road.

### **The Council's Partial Review of the Business and Enterprise chapter of the 2010 Core Strategy**

8.3.1 In November 2014, the Council published a second version of an Issues and Options paper on Enterprise, re-launching this element of the continuing Partial Review of the 2010 RBKC Core Strategy.<sup>3</sup> This document set out a number of questions and invited responses, as the initial stage in updating relevant 2010 Core Strategy policies.

8.3.2 This latest RBKC 'Issues and Options' paper recognises that the 2013 Peter Brett/Roger Tym report questioned the continuing viability of the Latimer Road part of the Freston Road/Latimer Road Employment Zone. It notes that the subsequent 2014 study by Frost Meadowcroft<sup>4</sup> describes the 'Latimer Road EZ' (presumably referring to the Freston Road/Latimer Road EZ) as 'viable' rather than 'marginal'. On this basis the RBKC paper concludes that *'there is no reason to believe that the Borough's main office locations are intrinsically unviable for continued office use. There are, however, small pockets within the Borough where the market is less robust or where encouragement is needed if future refurbishment is to come forward.'*

8.3.3 On the evidence amassed by the StQW Forum, this Draft Plan challenges this view of viability in respect of Latimer Road. The Forum shares the view of the Peter Brett/Roger Tym study that the Latimer Road section of the joint EZ lacks essential features of critical mass and location, required to make it attractive to the office market. The Forum sees a risk that this position will worsen, rather than improve, as competition grows from the recently approved new developments across the railway line in LBHF.

8.3.4 As is the case for the 2010 RBKC Core Strategy, the new Issues and Options paper takes a narrow view of what constitutes 'business' use. This is confined to those which fall under Class B of the Use Classes Order, and include office, light industrial and storage uses. The retail and food/drink sectors are therefore excluded. So are the range of D class uses (gyms, creches, day nurseries, galleries).

8.3.5 The new RBKC Issues and Options paper does not appear to recognise that without coffee shops, food stores, and a range of other activities, streets zoned for a narrow definition of 'business use' are not where Londoners want to come to work in this day and age. The direction of travel set by the Issues and Options paper is welcome in opening up some new avenues, but remains too little and too late to achieve a revival of Latimer Road.

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<sup>3</sup> Core Strategy Review: Enterprise Issues and Options  
RBKC November 2014 at <https://planningconsult.rbkc.gov.uk/consult/ti/EnterpriseIO/consultationHome>

<sup>4</sup> Frost Meadowcroft Market and Viability Assessment for RBKC, 2014

8.3.6 RBKC seeks to justify a continuation of restrictive policies to protect B1 office use on the need to have 'robust' policies in place under three different scenarios which may emerge after a forthcoming Government decision on permitted development flexibilities and on the current RBKC borough-wide exemption. It floats a series of policy options for the future, but none of these are seen by the Forum as providing a solution for Latimer Road. Earls Court is singled out by the Council as a 'very secondary office location' in need of differential policy treatment, but not Latimer Road.

8.3.7 In the view of the StQW Forum, the Council is placing too much reliance on a 2014 study of office viability which failed to recognise the differences between the Freston Road and Latimer Road parts of the currently combined Employment Zone, in terms of attractiveness, achievable rent levels, and future viability. More details and financial information to support this argument are set out below.

#### **Latimer Road as at present**

8.4.1 The visual appearance of the street reflects the fact that the borough boundary ran down the middle of the road until 1996. Hence Latimer Road no longer has the built form of a traditional London street, as it was when originally built. The policy proposals in this Plan aim to restore built forms and building heights closer to the original 19th century appearance and proportions.



*Latimer Road in the early 1900s, a busy thoroughfare between North Pole Road and Holland Park Avenue, with a mix of housing, joinery firms,*



*Latimer Road today, with some remaining useful local facilities but with small office units lying vacant at its southern end.*



8.4.2 The last remaining pub in the StQW area (the Ariadne Nectar bar) is at 274 Latimer Road. The freehold was sold in mid 2014 by Enterprise Inns to UK Investments Ltd. An earlier application to convert the premises into a single residence was refused by the council, with support from the St Helens Residents Association in 2012. RBKC has since strengthened its policies resisting loss of pubs. This is a further building in which the StQW Forum is taking an active interest and monitoring future plans.



*The Ariadne Nectar pub. Original buildings on the eastern side of the street are higher than the original houses on the west side.*

### Units 1-14 Latimer Road

8.5.1 On the western side of Latimer Road is a row of low rise industrial units and warehouses. These were built following planning approval granted by LB Hammersmith & Fulham to New Estates Ltd in 1979 for the construction of 10 warehouses and 4 light industrial units. They are known as Units 1-14 Latimer Road.

8.5.2 Each unit is now in separate freehold ownership. In most (but not all) cases the title deeds include a covenant restricting use of the premises, and excluding the sale of alcohol and residential use. It is not clear who now holds this restrictive covenant, although there is reference in the deeds to the National Westminster Bank acting as trustee for the London Small Business Property Trust (a body which seems no longer to be extant).



*One of the 14 warehouse/light industrial units on the west side of Latimer Road. While some are in active use and provide local services, others contribute little to footfall, vitality, or the environment of the street.*

8.5.3 Current uses of these light industrial units are set out in the table below. The buildings are either one storey or two storey including a mezzanine floor.

Name or registered owner	Current use	No. of staff on site	Comments
1 Farouk Garage	Specialist Alfa Romeo garage	1	
2 MGA Motors	Garage and MOT centre	4	
3 S&O Media Ltd	Media company (film) technicians)	20	Owner occupied premise
4 Central London Dial A Ride Ltd	Operating as a commercial laundry	1-2	
5 Butchoff Antiques	Assumed to be furniture storage	-	No visible activity
6 private individual	No signage or indication of use	-	No visible activity
7 Shane Connolly Flowers	Floral decorations	7-10	Two separate small

Knickerbocker Glory	Media production company		businesses
8 The Playground Studio	Theatre and performance space	None	Owner occupied premise available for hire
9 Squeeze Event Mixology	Mobile bar hire and bar training	-	No visible activity, and thought to be in administration.
10 Grove Studios	Recording studio, with 5 rehearsal studios	2-3	
11 Latimer Studios	3 small businesses (interior design /architecture)	20-25	Building recently refurbished
12 Office and General Holdings Ltd	Commercial cleaning company	20-25	Owner occupied premise
13 City Electrical Factors	Electrical supplies	6	
14 Frontiers	Storage of shop fittings, mannequins	None	External signage pre-dates current use

8.5.4 In 9 of the 14 units the number of employees on site are low, which is unsurprising since 10 of the units were originally constructed as warehouse space rather than light industrial. But in the remaining units which have switched to office use, numbers of employees are significant. The recent refurbishment of Unit 11 shows how the ground and mezzanine floors of these buildings can be become successful office accommodation, suited to small design companies and including the type of open plan meeting spaces/staff self-catering areas that contemporary office tenants seek.

8.5.5 The details above also show that many of the uses of Units 1-14 would be compatible with residential accommodation on redeveloped upper floors. Where building owners of 'light industrial uses' choose not to redevelop (and the two garages may well remain economically viable in the future) some existing uses would continue to create some noise. Such proximity of housing and other uses is not uncommon in the many mixed use streets within RBKC. Design of housing units would also need to take account of noise from the railway line at the rear of all properties on the western side of the street.

8.5.6 As noted in the Peter Brett/Roger Tym study of commercial property in the Borough, much of what is classed as 'light industrial ' or warehousing has now become the type of relatively open plan studio and workshop/office space, in demand from creative industries. Such space is scarce in RBKC. Freston Road and Latimer Road, when combined, make up 20% of the Borough total. **This Plan proposes no diminution of this type of floorspace in Units 1-14 Latimer Road. It encourages the transfer of remaining warehouse/storage space at Units 1-14 to mixed use buildings of the kind in demand in North Kensington.**

### Office and other commercial space in Latimer Road

8.6.1 One substantive office building (ground floor only) is located at 316-9 at the northern end of Latimer Road. The head office building of Designers Guild is located behind the eastern side of Latimer Road, half way along the street. The main office floorspace in the street is contained within a cluster of 1980s purpose built three storey office buildings at the southern end of street. These are where the main problems of long term vacant floorspace have arisen. The Westway Trust obtained planning approval in 2006 for a B1 office building of 1,230 sq m at this location but did not subsequently pursue this because of lack of demand.

8.6.2 The table below sets out uses in all the office buildings in Latimer Road, other than Units 1-14 as described above. **The floorspace figures shown are for floors above ground, i.e the floor areas potentially affected were StQW policies to allow partial change of use to residential put into effect.** The staff numbers similarly relate to upper floors only. The rental figures (where available) are current. Some building owners are reluctant for rent levels to be shown and in these cases these are shown as n/a (not available). Several of the buildings are owner-occupied, where rental levels do not apply.

Latimer Road east side	Current use	Floorspace above ground (sq ft)	Related No. of staff	Rent (per sq ft)	Comments
316-319 <i>re:fine</i>	Digital content processing and media management company	Nil	Nil	n/a	Single storey building so would not be affected by STQW Plan
296	Being redeveloped as an individual photographer's studio and archive.	800	1-2 on 1st floor	Owner occ.	Owner-occupied and for private use. Meeting room + 2 small offices above ground floor.
290-294 Placebold development	Mixed use development comprising 12 flats, offices, workshops	6,000	n/a	n/a	Office space on 1st and 2nd floor might change use under StQW policies, but is more modern and attractive than space at southern end.
Designers Guild	Headquarter offices for global business on interior design, and fabrics.	5,500	n/a	Owner occ.	Modern office building plus 2 flats approved 2001. Office space above ground floor appears unlikely to change to residential.
204 Latimer Road	Small office suites	1,700	8	n/a	
206-208 Park House	Purpose built complex of 6 business units	2,900	25	£18/19	
<b>Latimer Road west Side</b>					
335-339 Morelli Building	3 storey private offices and recording studio, with B1 use, owned and used by musician.	2,500	6	Owner occ.	Change of use unlikely under present owner
333 Latimer Road (Latimer Cortile)	Three business suites, in a joint building with No.329 below	2,200	6	£15.50	3 storey plus mezzanine office development built in 1980s.
329 Latimer Road (Latimer Cortile)	Three further business suites	2,200	5	Owner occ.	3 storey plus mezzanine office development built in 1980s.
323-327 Ivebury Court	10 small office suites.	4,000	15	£15	3 storey courtyard office development, built in 1980s. Current vacancies.
317-321 Olympic House	Office suites. A recent RBKC decision to permit D2 and A retail use in addition to B1 has led to a new letting on the ground floor, bringing 20 employees to the street.	8,000	16	£19	3,300 sq ft on ground floor now in mixed use, health care and gym, following 2014 RBKC approval to widen uses. Part of this space previously vacant.
303-315 Gumball Rally	London premises of US company organising international motor rallies	4,000	19	n/a	Same company has 2,000 sq ft on ground floor

## Occupancy, viability and office rent levels in Latimer Road

**8.7.1** The above information leads to three conclusions:

- the existing office space in the 1980s business suites at the southern end of Latimer Road, on floors above ground level, has low occupancy levels. Average space utilisation is 275 sq ft per person, or roughly three times the space allowance expected in modern office premises.
- these low space utilisation levels reflect a combination of vacant floorspace and the fact that building/owners landlords are having to offer low rents (and high space allowances per person) to attract tenants. The figures mean that the offices at this location contain many fewer jobs than would be expected from desk-top studies.
- **Office rental levels being achieved in Latimer Road are a long way from the figures quoted in the 2014 Frost Meadowcroft report<sup>5</sup> on which the Council has relied in preparing its Issues and Options paper on Enterprise.** (Frost Meadowcroft include a table of average office rental levels for different parts of the Borough, quoting figures for the Freston Road/Latimer Road Employment Zone of £37 per sq ft for Average Grade A space and £26 for Grade B).

8.7.2 On viability across the Borough, the 2013 Peter Brett/Roger Tym study concluded '*As a broad approximation, a rent of around £300 per sq m, combined with a good tenant covenant, is typically required to support viable development in Kensington & Chelsea. At rents below £200 or so, it may not even be viable to maintain existing property in a lettable condition, especially if there is pressure to redevelop it for higher-value uses*' (Para 4.2.2).

8.7.3 This position has applied (for several years) to the southern part of Latimer Road. Rent levels of £190 (or £17.60 per sq.ft) have failed to attract office tenants to the small business suites at Olympic House and Ivebury Court, despite extended marketing. Such rental levels provide landlords with little margin to set aside for planned maintenance or refurbishment.

8.7.4 While this position might improve following the construction of the underpass between Latimer Road and Imperial West, the risk remains that competition from soon-to-be-built business space in Hammersmith and Fulham will erode further the viability of what will never be more than a small cluster of Latimer Road office suites. In terms of the London-wide economy, what purpose is there in protecting B1 uses in this group of unsuitable 1980s office buildings simply because they fall on one side of a borough boundary, when major new office developments are being built a few hundred yards away?

8.7.5 Imperial College's *Thinkspace* will from 2016 offer 75,000 sq.ft of business incubator floorspace in brand new office accommodation on the Imperial West site. *Thinkspace* already operates in Wood Lane, alongside cheap start-up space at the BBC supported Creative and Media Campus at the Ugli Building. This provides flexible desk space to business start-ups from £185 a month, in an environment that approximates more to East London's Silicon Roundabout than is the case for Latimer Road. Bar, cafe and meeting facilities, along with close proximity to the Central Line, are attractions that small office suites in Latimer Road cannot match.

8.7.6 Hence the opening of the underpass may or may not bring significant new business investment to Latimer Road. Unless the street can market itself as more attractive for a wider mix of uses, the physical and commercial attractions of office premises on the western side of the railway line will increasingly outstrip those of Latimer Road, as the Imperial West and White City East developments are built out over the next 3-5 years. The White City Opportunity Area Planning Framework envisages between 156,000 and 207,000 sq metres of office floorspace in White City East.

8.7.7 The Peter Brett/Roger Tym 2013 report suggested that the Council faces policy options of either undertaking serious investment in infrastructure and facilities in Latimer Road, or of pursuing a 'do-

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<sup>5</sup> Office Market Review and Viability in the Royal Borough of Kensington & Chelsea On behalf of the Royal Borough of Kensington & Chelsea By Frost Meadowcroft

minimum' option. The report goes on to say *'If the Council adopts this do-minimum option, therefore, it should consider relaxing the policy that safeguards existing offices the north of the zone. As a result, Kensington & Chelsea would lose some office space and some jobs – probably to other emerging areas in the central London fringe. under which the area will continue to decline with resultant growing pressure to allow change of use from office floorspace to residential and a resultant loss of jobs'* (para 4.64).

8.7.8 These consultants questioned the viability of a third option of mixed use intensification, on the grounds that commercial and residential uses are incompatible. But their analysis took a narrow view of 'mixed use' (in assuming B1 business and residential use only) rather than looking more broadly. Both the Peter Brett/Roger Tym study and the existing RBKC Policy CF5 take insufficient account of the way mixed use has developed in an evolutionary way in other parts of London, seeing lively and creative quarters emerge with an A class element (retail galleries/shops for art, craft and photography, cafe/food stores) and D class (creches, gyms) or Sui Generis uses (informal education, niche cinemas and performance spaces, music venues).

8.7.9 The 2014 Frost Meadowcroft report makes much less attempt than the Peter Brett/Roger Tym study to assess what are now marked differences between the Freston Road and Latimer Road sections of the joint Employment Zone. Their report merely noted that the Latimer Road part *'has lower access to public transport'* without exploring other factors reducing attractiveness and viability.

8.7.10 A business suite at Ivebury Court has been unsuccessfully marketed over the past year at a quoting rent of £17.50 (as it happens, by Frost Meadowcroft). Floorspace in this building has remained unlet for five years at a similar rental level. The Council in 2014 allowed a more flexible range of uses on the ground floor at Olympic House, which led to the vacant space being relet after a similar 5 year period.

### **The risks of loss of jobs resulting from proposed StQW policies for Latimer Road**

8.8.1 The Council's reluctance to support the policies proposed for Latimer Road in this Draft Plan appears to stem from the same concerns that underpin its campaign to retain a Borough-wide exemption from national flexibilities on change of use from office to residential. While this approach makes sense at Borough-wide level, it does not for locations where it leaves outdated buildings under-occupied or vacant.

8.8.2 The borough is only a small part of a Greater London employment market. Employment floorspace or jobs 'lost' to RBKC are highly unlikely to disappear from the capital as a whole. Firms routinely relocate within boroughs and across borough boundaries to maximise advantages of location, public transport accessibility and rent levels.

8.8.3 Widening the range of permitted uses in Latimer Road would not, in the view of the StQW Forum, necessarily lead to a net loss of jobs. The table at 8.6.2 above shows that the total number of current employees on floors above ground in office buildings at the southern end of Latimer Road is under 100. Were a further 4 or 5 of the light industrial/warehouse units to be refurbished as studio/office workspace, rather than remaining as storage, this could re-create the same number of new workstations elsewhere along the street. This is before taking into account new jobs that would come into the area by allowing a wider range of A and D class uses within existing buildings.

8.8.4 In practice, a changed planning regime for the street would not lead to an instant switch from B1 office to A or D class uses, or to residential as proposed below. Given that a number of the buildings are owner-occupied, and Units 1-14 are in separate ownerships, plans for refurbishment and/or redevelopment would be likely to come forward on an incremental basis, allowing the street to evolve over time.



8.8.5 Any net change in the number of jobs in Latimer Road would, in the view of the Forum, be negligible as a proportion of the estimated 20,300 employees working in B1 floorspace across the Borough<sup>6</sup>, let alone the 60-70,000 new jobs planned for the White City and Old Oak Opportunity Areas.

8.8.6 It should also be recognised that during a period when the small business units in Latimer Road have become increasingly hard to let, there has been a significant growth in the numbers of self-employed people working from home. The 2014 Frost Meadowcroft report notes that *'approximately 10% of all the businesses in the Borough are classified as 'Home Based Businesses', which is a high proportion in comparison with the London average (5.6%)'*. Changing patterns of work are a further reason why the StQW Forum believes that its policy proposals for 2015-30 will not impact adversely on the Borough's economy or employment levels in this part of North Kensington.

### **The prospects for Latimer Road as a vibrant mixed use creative quarter**

8.9.1 Local residents and businesses have for some years been asking themselves why the type of transformation that has taken place in many 'mixed use' streets in Shoreditch, Bermondsey, Clerkenwell and other parts of London has not happened on Latimer Road? Why is this street, given its proximity to Portobello and to its own residential catchment area of 1,700 households, still a place with little footfall, nowhere to have lunch or a cup of coffee, no bars and one pub (now usually closed), no interesting shops (or any shops) and with a deserted feel to it?

8.9.2 Residents also wonder why they have to walk or drive out of the StQW area to find a restaurant at which to eat in the evening. The younger generation find nowhere in the neighbourhood to socialise.

8.9.3 The StQW Survey asked a number of questions about what was seen as lacking in the neighbourhood area. 105 people responded:

- In reply to *"which parts of the area would benefit from regeneration?"* 47% of respondents suggested Latimer Road.
- in reply to *"where are there opportunities to support a wider range of employment in the area?"* 28% people said Latimer Road.
- in reply to *"Where are there opportunities to create more places to eat or drink in the area?"* Latimer Road was nominated by 38% of respondents.
- in reply to *"Where are there opportunities to provide more homes in the area?"* Latimer Road was nominated by 23% of respondents.

In all four cases, Latimer Road was nominated more frequently than any other street in the area.

**8.9.4 The best prospect for retaining a good level of employment activity in this small part of North Kensington lies in studio/workshop accommodation at modest rents, which can continue to attract 'creative industries'. Inclusion of other employment generating uses (A and D class) also makes sense, and would bring activities to the street which local people want to see there. The light industrial premises at Units 1-14 are potentially more suited to such uses than are the upper floors of outdated 1980s small business suites at the southern end of the street.**

### **Additional housing in Latimer Road**

8.10.1 For redevelopment of some existing buildings in Latimer Road to become economically viable for building owners, a sufficient input of residential floorspace will be needed in either new or renovated buildings. Building heights are always a sensitive issue, and the Forum is opposed to increases in building height within the conservation area part of the neighbourhood. But it must be recognised that the existing

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<sup>6</sup> Impact of proposed changes to permitted development rights for Kensington and Chelsea, TBR, 2013

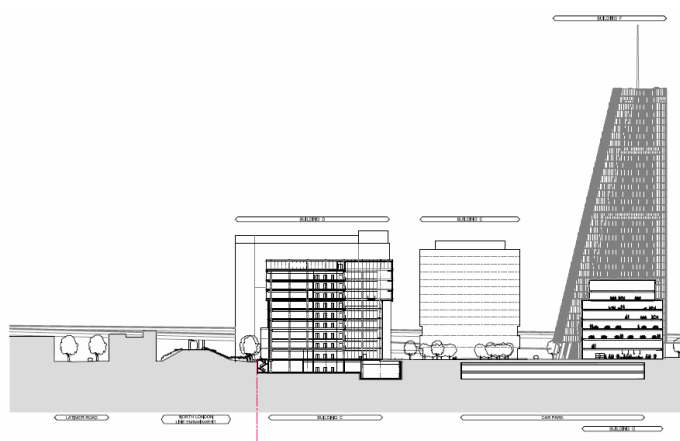
office buildings, and a number of the light industrial units on the west side of Latimer Road, will be backing onto Imperial West buildings of 12 storeys and above, just across the railway line. Some are already overshadowed by the 10 storey blocks of student accommodation. These changes flow from planning decisions already made and beyond the control of either the Royal Borough or the StQW Forum. Hence this Plan proposes that building heights on the western side of Latimer Road should be allowed to rise.

8.10.2 StQW proposed Policy 9(e) below sets a maximum height for buildings on the western side of Latimer Road of 14m. This height has been selected as being the same as the current tallest building on this side of the road (the Morelli building at No. 335-339, for which approval to an additional fourth floor was granted by the Council in 2010). Photographs of this building, and others in the street, were shown at the Forum's open meeting in July 2014 so that the public could appreciate what this guideline maximum height would look like. The figure of 14m was considered acceptable, given the context of 10 storey buildings across the railway line in LBHF.



*Potential for incremental redevelopment of the light industrial units 1-14 Latimer Road, with housing above continued studio, workshop, light industrial and warehousing use on ground and mezzanine floors.*

8.10.3 This height level would allow for the addition of two floors, in respect of the light industrial buildings, and one or two floors for the office complexes at the southern end. The Imperial West Translation Hub, on which construction work has started, will be 12 storeys and 60m high, just across the railway line on the eastern boundary of the site. The proposed 35 storey tower at Imperial West will be 112m high. The impact for Latimer Road residents of allowing increased building heights needs to be seen in this context.



*Comparison of building heights between Latimer Road (left of image) and the Imperial West development*



IMPERIAL WEST

ILLUSTRATIVE MASTERPLAN

### How should change to Latimer Road take place?

8.11.1 Meetings of the Forum (and previously the St Helens Residents Association) have discussed the future of Latimer Road on several occasions since 2012. Overall, there is a strong feeling in the neighbourhood that Latimer Road is an area 'yet to happen' but one where there is all the potential. Local residents would like to see the area change in ways that are evolutionary and retain the better features of the street, with a direction set by this Plan and with future planning applications determined by the Council in accordance with the policies proposed below.

8.11.2 Owners of office buildings have been waiting several years for a more flexible and responsive planning policy stance from the Council, before re-investment in property can start. Excluded from the more flexible arrangements on change of use introduced by Government (by the RBKC exemption) these building owners are impatient for change and unhappy at the delays on the Partial Review of the Council's 2010 Core Strategy.

8.11.3 Owners of the light industrial units see their properties gaining in value, partly because of the scarcity of studio/workshop space in the Borough and partly because house prices in Latimer Road have been rising fast as this part of W10 is 'discovered' by buyers priced out of other areas in North Kensington.

8.11.4 Incremental redevelopment of these units, to a common planning and design brief, is seen as the most feasible and realistic option. This will allow for the retention of those of the businesses in Units 1-14 that are doing well, and whose presence in the street is valued locally.

8.11.5 The StQW management committee has considered the scope for a Neighbourhood Development Order covering this section of Latimer Road. The introduction of such Orders was originally seen as a major plank of the 2011 Localism Act, allowing neighbourhood forum and parish councils to encourage and speed through the planning system specific forms of development in specific locations.

8.11.6 To date the use of such Orders has proved to be negligible, as they have proved a cumbersome instrument<sup>7</sup>. On balance the StQW management committee has concluded that **a non-statutory design**

<sup>7</sup> Allerdale District Council has adopted a Neighbourhood Development Order, drawn up alongside the Cockermouth Neighbourhood Plan. The Order permits a change of use of ground floor premises in a specified part of Cockermouth, and use of pavement space for eating and drinking. The Order took three years to get in place. No other NDOs appear to have been adopted to date.

**brief** for this section of Latimer Road offers a simpler way forward. This would establish building lines, car parking and delivery arrangements, and give guidance for building owners to follow on fenestration, elevation treatments, and building materials. The objective would be for Units 1-14 to be redeveloped over time in a way that is coherent and attractive, and to restore to this section of Latimer Road the feel of a London street -- as opposed to the present unsatisfactory mix of Victorian buildings on one side and a 1970s industrial estate on the other.

8.11.7 In terms of compliance with the Basic Conditions for neighbourhood plans, the StQW Forum considers the proposed policies set out below, which widen the range of use classes permissible in the street, to reflect the Government's efforts to regenerate areas where buildings have been lying vacant or underused, the National Planning Policy Framework, the London Plan (Strategic Policy 2.9 A and 3.3A on Housing Supply, 4.1A on Developing London's Economy) and to be in 'general conformity' with the Local Plan (RBKC Core Strategy). Further justification for this view is set out in the Basic Conditions Statement.

#### **LATIMER ROAD - KEEPING BUILDINGS IN ACTIVE USE: DRAFT POLICY StQW 8**

***8a) Subject to confirmation on Examination of the scope and 'general conformity' of this section of the StQW Neighbourhood Plan, the Local Planning Authority to de-designate those sections of Latimer Road currently defined as part of the combined Freston Road/Latimer Road Employment Zone, within the RBKC Core Strategy.***

*Reasoned justification: the case for including separate sections of Latimer Road within a joint Freston Road/Latimer Road EZ was not strong from the start, given the physical separation of the areas, and has weakened in recent decades. Viability of office uses in the two parts of the Zone now varies markedly.*

***8b) Whether or not Policy 8a above is adopted, to allow residential use of upper floors of existing and redeveloped B class buildings within the currently designated Employment Zone sections of Latimer Road, provided that the ground (and any mezzanine floor) remains in commercial use.***

*Reasoned justification: the restrictive planning policies applied by RBKC to Latimer Road are hindering re-investment in premises and failing to respond to market forces. While the Borough has a good overall case for exemption from Government flexibilities on change of use, this should not override or obstruct a new national planning approach to the future of small clusters of outdated office buildings with a history of vacancies and uneconomic rents.*

*Paragraph 22 of the NPPF states 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed'.*

***8c) Whether or not Policy 8a above is adopted, to allow A1, A2, A3, A4, D1 and D2 class uses, along with any B class use other than B2 and B8 (over 500 sq.m) in the currently designated Employment Zone sections of Latimer Road, where such uses contribute to the vitality of the street and to the wider neighbourhood area.***

*Reasoned justification: one of the reasons why Latimer Road fails to attract office tenants is the absence of other activities, facilities and amenities in the street. Current RBKC Policy CF5(j) goes some way towards the above proposed policy but is dependent on RBKC taking a broad view on what uses are deemed to 'directly support the function and character of the zone'. This lack of clarity is a deterrent to alternative uses coming forward. StQW Policy 8c would provide such clarity as well as widening the scope of the contribution Latimer Road can make to the neighbourhood as a whole.*

**8d) 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.**

*Reasoned justification: this policy could be argued to be a 'duplicatory' to RBKC Policy CR6 but its inclusion in the StQW Plan would send a signal to existing and potential incoming businesses/residents that this is the kind of neighbourhood which the StQW Forum is seeking to create.*

**8e) To allow increases in building heights on the western side of Latimer Road to a guideline maximum overall height of 14m, taking into account the position within the street in terms of immediately neighbouring buildings and any buildings which have received planning approval from LB Hammersmith & Fulham across the borough boundary.**

*Reasoned justification: the current urban form of the street is incoherent and unsatisfactory, with Victorian housing on the east site higher than light industrial/warehouse units on the west. Development across the borough boundary in LBHF is eroding the previous open skylines to the west. A limited increase in building heights on the western side is needed to incentivise redevelopment of existing buildings and to encourage additional housing into the street. The 14m maximum guideline is predicated on the existing tallest commercial building, and has been judged as acceptable at a public meeting of the StQW Forum.*

## **ACTIONS**

8i) to develop a set of Design Guidelines, in conjunction with RBKC, to provide a framework for the incremental redevelopment of Units 1-14 and other commercial premises on the western side of Latimer Road, so as to ensure a consistent approach to building lines, building heights, massing, fenestration, use of materials, delivery and parking arrangements, with the aim of restoring a coherent streetscape of human scale, with active frontages and a positive relationship between buildings and the street.



# Employment

## Objective 9 *Maintain and where possible increase employment opportunities in the area*

9.1.1. Using average figures from the 2011 census for the St Charles and Notting Barns wards, 34% of people in the StQW neighbourhood were at that time in full time employment. The wards are ranked 15th and 17th across the borough, in terms of employment levels. Of the economically active, a further 12.5% were self-employed and 7% were unemployed. As explained in the introduction of the plan, ward figures are not fully representative of the StQW area and within the defined neighbourhood employment levels are likely to be higher and unemployment lower.

9.1.2 In both wards the largest occupation groups are

- Associate professionals and technical (e.g. police officers, graphic designers, laboratory technicians)
- Professional (scientists, engineers, IT professionals, nursing, teaching)
- Managers, directors and senior officials (chief executives, senior official, financial institution managers, officers in the armed forces)

9.1.3 In each of the above categories, these figures are higher than the London average while lower than the RBKC average. These confirm the perception of the StQW area as one which retains a broader social and economic mix, characteristic of North Kensington, as compared with parts of the Borough such as Knightsbridge and Chelsea.

9.1.4 Local residents, through the StQW survey and at public meetings, have expressed a view that they wish the area to remain one which includes employment and economic activity, rather than a purely residential area. Local people do not wish to see the neighbourhood become 'hollowed out' through lack of shops and services, as has become a trend in those parts of the Borough experiencing more acutely the phenomenon of 'Buy to Leave'.

9.1.5 Hence the policies in this plan aim to retain and if possible improve on employment levels within the neighbourhood. Jobs in the area are located partly in the current Latimer Road Employment Zone and in the four shopping parades. As noted above, it is estimated that approximately 10% of all the businesses in the Borough are classified as 'Home Based Businesses'. This is a high proportion in comparison with the London average (5.6%) and demonstrates that the correlation between the RBKC definition of 'business floorspace' and actual employment levels continues to weaken.

9.1.6 No hard data is available on the number of new home-based jobs which have been created in the StQW area over the last decade. But given the hugely increased scope for such activity as a result of fast broadband, and the socio-economic composition of the area, it is likely to be a significant figure.

9.1.7 In relation to Latimer Road, the policies proposed under Objective 9 are designed to retain broadly existing levels of business and commercial activity levels in the street – even if some vacant and current B1 business units above ground floor disappear as a result of proposed new policies. Widening the range of permitted uses, and bringing back non-office jobs and other activities to the street should balance out any loss of office employees and (over time) increase the range and number of jobs in the area.

### **EMPLOYMENT: DRAFT POLICY StQW 9**

***9a) in the context of mixed use policies for Latimer Road as set out in StQW Policy 9, to encourage uses which will increase employee numbers on site (as opposed to e.g. warehousing and storage) within the full range of A, B and D class uses.***

*Reasoned justification: while there are limits to the extent to which any part of a development plan can influence the number of employees working within an area, this policy is designed to steer development control decisions towards building uses which increase actual jobs on site, thereby bringing greater vitality to the area (e.g. in relation to applications for change of use from B8 warehouse to B1 office use).*

*9b) through increased flexibility on permitted use classes under StQW Policy 7, to reduce the number of vacant shop units within the two neighbourhood shopping parades (North Pole Road and St Helens Gardens) thereby creating new employment opportunities.*

*Reasoned justification: complements StQW Policy 7a in the section of this plan on Shopping*

#### **ACTIONS**

9i) continued liaison between StQW Forum and building owners in Latimer Road, North Pole Road and St Helens Gardens to bring vacant and underused premises back into active use.

9ii) to contribute to the review of the 'Enterprise' section of the RBKC Core Strategy

# Housing

## Objective 10 *Seek out opportunities for building housing affordable to younger generations*

### RBKC Housing policy and targets

10.1.1 Current RBKC policies on Housing are set out in the Chapter 35 of the 2010 Core Strategy. In its 2013 Housing Policy Review the Council notes that *'Since the adoption of the Core Strategy in December 2010 house prices have continued to rise to an average of over a million pounds (£1,094,203). This is nearly double the average house price in 2005 and the highest average in England'*.

10.1.2 Demand for housing in the Borough is 'insatiable' (The Council's own term). RBKC's stated strategic focus is therefore on *'achieving a diversity of housing in mixed communities, to reduce the potential of further polarisation between, in broad spatial terms, the north and south of the Borough'*.

10.1.3 The tenure profile in the Borough based on the 2011 Census is: 36 % owner occupation, 24% social rented housing, 37% private rented housing and 3% other. The private rented sector has the highest turnover of households compared to the other tenures , with 20% of the population estimated to change each year. Comparable figures for Inner London as a whole are around 40% of homes as owner occupied, 40% as social rented housing and 20% in the private rented sector.

10.1.4 The 2010 Core Strategy set housing targets of a minimum of 3,500 homes to be provided between 2007/8 and 2016/7 (i.e. a rate of 350 units per year). The London Plan was amended and adopted in July 2011 and the RBKC target was increased. The 2013 RBKC Policy Review assumed a target of 585 homes per year, over a 10 year period.

10.1.5 The Council is only part way through the revision of its Strategic Housing Land Availability Assessment (SHLAA), but this indicates that the Borough's housing targets could go up significantly, principally because of the large strategic sites that have been identified through the Core Strategy.

10.1.6 The agreed RBKC target for affordable housing in the adopted London Plan (July 2011) is 200 units per year, to be provided over a 10 year period.

10.1.7 In reality, numbers of houses built in the Borough have not got close to these targets in recent years. The workings of the development market are such that actual completions of new housing units also fall well below the level of permissions granted. Figures for actual completions in 2009/10 and 2010/11 were 324 and 175. The 2013 RBKC Monitoring Report notes a further reduction in the 2011/12, with 244 units approved and only 65 units completed.

10.1.8 Three of the housing challenges facing the Borough were identified in its 2012 Issues and Options paper:

- Affordability of housing remains a key issue in the Borough, with rising house prices.
- Following the Government's introduction of Affordable Rent Tenure, very few households on the Register can afford Affordable Rent at 80% of the median market rent.
- Many of the market housing units that are delivered in the Borough do not address the range of identified local housing need *'but do meet an international need for those able to afford the very high residential prices within Kensington and Chelsea and contribute to London's role as a Global City'*.

10.1.9 At the top end of the income spectrum, the 'Buy to Leave' phenomenon in parts of Kensington & Chelsea and in Westminster has become a feature of the central London housing market.

10.1.10 The Council has been conducting a review of occupation levels of newly built housing. There is an obvious need to demonstrate to the public that the limited amount of new housing that is being built in the Borough is not subsequently standing empty, treated by overseas buyers as an asset class rather than as a home.

#### **How much new housing should the StQW area provide?**

10.2.1 The Council does not disaggregate its borough-wide targets down to individual wards or to smaller areas within its boundary. Hence there is no notional target figure that the StQW Plan will be expected to deliver. Most of the new housing in North Kensington is expected to result from development of the Kensal Rise Opportunity Area, with only 'windfall' and small development sites becoming available within the StQW neighbourhood.

10.2.2 Nevertheless, local residents would like to see the StQW area make its contribution, provided that new housing is at the 'more affordable' end of the spectrum, with at least the possibility that a younger generation will prove able to live their lives in this part of London.

10.2.3 Local residents have no great wish to see a housing market in the StQW area which *'meets an international need for those able to afford very high residential prices'*. Residents are content to see other parts of the Borough fulfil this role. This is not an 'anti-growth' nor an insular view. It is one that recognises that central London must retain some areas which meet the needs of all income ranges, older down-sizers, and especially the young, if the city is to continue to flourish. North Kensington has in the past fulfilled this role. It is one consistent with the Council's 'strategic focus' for housing.

#### **The nature of housing in the StQW area**

10.2.4 There is a perception of the StQW neighbourhood (promoted by local estate agents) as an area on the edge of fashionable Notting Hill and one which is swiftly becoming a high-income residential enclave. The reality is more complex. It is true that house prices in W10 have risen in recent years (and particularly sharply in 2014) as a result of the 'ripple effect' of Prime London.

10.2.5 Yet within the streets of the StQW area there remain a significant number of less affluent households, including families which have lived in the neighbourhood for generations. The RBKC 2010 Core Strategy notes that between 50% and 70% of the housing stock in Golborne, St. Charles, and Notting Barns wards is social rented housing. The figures for the StQW area will be much lower, but by less than many might expect.

10.2.6 An analysis of 'fair rents' rents pre-dating the abandonment of rent control in January 1989 reveals a total of 246 rents registered with the Valuation Office, within the StQW neighbourhood. These are in Kelfield Gardens (8), Brewster Gardens (8) and Coronation Court (10), Bracewell Road (10), Highlever Road (23), St Quintin Avenue (28) and Cowper Terrace (9), Latimer Road (21), St Helen's Gardens (22), Wallingford Avenue (10), Oxford Gardens (8), Kingsbridge Road (1) and Evelyn Fox Court (27), Finstock Road (9), Balliol Road (7), North Pole Road (4), St Quintin Gardens (8), Blakes Close (12), St Marks Road (20), Bramley Road – Robinson House (19).

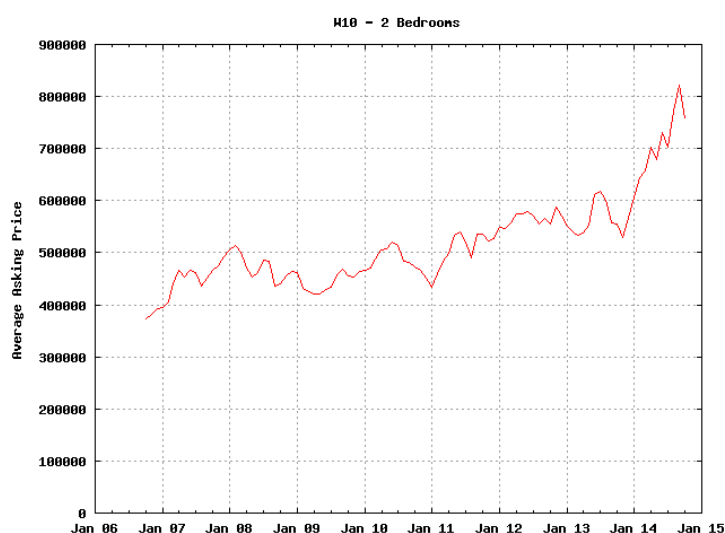
10.2.7 Given that these numbers are part of the estimated 100,000 registered rents remaining from 1989 legislation (and steadily shrinking as tenants die or relocate) this is a significant number for such a small area.



The new Argyll Place development in Pangbourne Avenue, on the site of the former Princess Louise Hospital.

10.2.8 While the average gross annual pay of RBKC residents in 2012 was the highest amongst all London boroughs at £36,000, income levels vary significantly within the Borough when looked at spatially. Many residents in the north of the Borough have incomes below £20,000 per annum, and high levels of benefit claims.

10.2.9 Significant investment is currently being made in the neighbourhood, particularly in the properties in the 'red-brick' streets of the St Quintin Estate. Over 50 basement projects have been granted permission in these streets since 2002, with an acceleration of activity in the past two years. Total refurbishment of properties, undertaken by developers for resale, has become more common.



Asking prices for 2 bed accommodation in W10 Source: London Property Watch

10.2.10 Responses to the StQW survey show some level of concern and nervousness over these trends. While recognising the rights of homeowners to invest in their properties, a message comes through that the area is perhaps changing too fast, raising the bar as to who can afford to live in it. There are anxieties over a perceived loss of 'neighbourliness' and an area that is losing most of its younger people, within what has hitherto been a multi-generational and mixed community.



10.2.11 The StQW neighbourhood has long attracted families with young children. The attractions are the house-type (not too many stairs, easy adaptability, room for a buggy or pram, some garden space) and the local environment (wide and safe streets and pavements, easy residents parking). There are good schools in the neighbourhood at primary level (Oxford Gardens as a state school, Bassett House as private).

10.2.12 These are all features of the area much valued by local residents, new and existing. The area's popularity for those with significant capital funds (but unable to afford 'Prime London') is evident from the regular flow of estate agent flyers, seeking new properties to put on their books.. For older families established in the area for decades (some for several generations) there is concern that their own offspring now lack any realistic chance of affording to remain in the area.

10.2.13 The availability of lower cost property in the streets north of North Pole Road, and in the Oakworth Road/Methwold Road area, has helped to counter this trend. But even in these streets, young professionals and public sector employees are being forced to look elsewhere, further north or west. There are also comparatively few smaller flats suitable for older couples looking to downsize.

### **Affordable housing**

10.3.1 RBKC 2010 Core Strategy policies require new developments to provide affordable housing at 50% of floor area, on residential floorspace within developments in excess of 800 sq.m gross external area. They also require provision to be in the form of a commuted sum in lieu of the equivalent amount of affordable housing floorspace where in excess of 800 sq.m but less than 1,200 sq.m of gross external residential floorspace.

10.3.2 In practice these 'thresholds' have no real impact. The Council accepts that *'In practice it has been found that the existing 50% floorspace target has never been close to being achieved as it is subject to a financial viability assessment'*.

10.3.3 The implications of Affordable Rent tenure introduced by the Government have also limited access to social housing. Very few households on the Register can afford Affordable Rent at 80% of the median market rent (the Government's figure) with the most practical level for Affordable Rent being 45 %.

10.3.4 Eligibility for social housing involves a number of criteria, including cases where the council has a duty to rehouse those living in temporary accommodation or on priority health grounds. The income ceiling is set at a gross household income of up to £66,000 per annum when applying to rent or buy a one or two bedroom property or up to £80,000 when applying to buy a family sized property (three bedrooms or more). Hence for many, including key public sector workers, 'affordable' housing in the Borough remains out of reach even if the household were to meet the eligibility criteria.

10.3.5 Part of the 2010 RBKC Core Strategy Policy CH2 requires that any off-site affordable housing (i.e. that where a developer provides funds to build units away from the site which is the subject of the planning approval) should **not** be located in certain wards, including the former Notting Barns and St Charles wards (the StQW neighbourhood). This policy was aimed at maintaining what the Council considered in 2010 to be an appropriate diversity of housing across the Borough. The 2013 Partial Review proposes to drop this policy , and adjusts the floorspace levels at which developments are required to provide affordable housing. Proposed new RBKC Policy CH2 (yet to be go through an Examination Public):

- requires developments that involve a net increase of 800 sq m of next floorspace to provide affordable housing at 40% by floor area on all the net additional floorspace created
- requires development of over 800 sq m of net additional residential floorspace to provide affordable housing on the total net increase in residential floorspace either

- i) as a commuted sum for developments with a net additional floorspace of below 2,400 sq metres
- ii) on site where the development involves a net additional residential floorspace of 2,400 sq metres or more

10.3.6 As in the rest of the Borough, land and sites for new housing is very scarce within the StQW neighbourhood. Little new housing has been built, apart from the one scheme in Pangbourne Avenue (Argyll Place). One or two infill developments have taken place on small sites.

10.3.7 The main increase in housing floorspace in the neighbourhood will have come from loft extensions and basements in owner-occupied properties rather than from wholly new homes. Unlike the streets with larger houses in the eastern part of the Oxford Gardens CA, loss of housing units through de-conversions of flats has not been an significant issue in the StQW neighbourhood.

### **Housing in Latimer Road?**

10.4.1 In response to an open question *Where are there opportunities to provide more homes in the area?* as included within the StQW Survey, 23% of respondents specifically identified Latimer Road. Incremental redevelopment of the light industrial units on the western side of the street (with additional floors added) could provide a significant number of new housing units.

10.4.2 These 14 light industrial units vary slightly in size and height, but each has a ground floor area of approx 240 sq m, excluding an outdoor loading bay. An additional floor at any unit would therefore provide for at least 3 two-bedroom flats, at London Plan space standards. The maximum guideline height of 14m proposed for the eastern side of Latimer Road would allow for redevelopment of the light industrial units with two additional floors (at domestic floor to ceiling heights) while retaining commercial space on ground and mezzanine.

10.4.3. There is thus the potential, over time, for some 40-60 new housing units to be created in Latimer Road. This would be an incremental process, given that the existing light industrial buildings and the various buildings containing small office suites, are all in individual ownership.

### **Other potential housing sites**

10.5.1 The other potential development sites for housing, as identified in this Plan are at 3-5 Crowthorne Road and at the St Quintin Garage site (142a Highlever Road). These are covered in more detail in Section 12 of this Plan, on Managing Development. The Crowthorne Road site could deliver 20 or so dwellings (this being the number proposed in the unsuccessful 2013 application). The St Quintin Garage site might allow for some 6-10 low rise or mews houses.

10.5.2 The development site at 301 Latimer Road, of which roughly one third will be taken up by the underpass from Latimer Road to Imperial West, is a further potential housing site. Section 5 of this Plan explains the case for reserving this site for possible transport infrastructure use for a 3 year period, following the adoption of the Plan.

10.5.3 As explained in Section 4 on Open Spaces, the Nursery Lane site is not seen by the StQW Forum as being suitable for residential development.

### **Scope for self-build**

10.6.1 The NPFF encourages policies which allow people to build their own homes. The scope for self-build in London is limited, given very high land values, but the Mayor of London has been supporting initiatives via an £8m programme 'Build your own Home - the London Way'.

10.6.2 The Council currently has no policies on self-build. The StQW Forum would be interested in working with Community Interest Companies and Community Land Trusts in exploring the scope for self-build within the StQW area. Latimer Road, given current property values for the light industrial buildings, might prove one of the very few locations in the Borough where this option could prove financially viable.

#### **HOUSING: DRAFT POLICY StQW 10**

***10a) To allocate for housing use (with an element of mixed use as appropriate to the individual location) the following potential development sites within the StQW neighbourhood***

- ***3-4 Crowthorne Road***
- ***142a Highlever Road***
- ***301 Latimer Road (subject to a 3 year reservation of this site for transport infrastructure, from the date of adoption of this Plan)***

***Reasoned justification: these are 3 sites within the StQW neighbourhood which local people see as suitable for predominantly housing use and as a means of contributing to the Borough's housing targets. Under current RBKC policies, the first would be required to deliver an element of B1 office floorspace, the second would be afforded protection as a social and community use (as operating in part as a petrol station) and the third would be protected for B1 use as lying within the Latimer Road Employment Zone.***

***10b) To provide additional housing in Latimer Road, through conversion/redevelopment of floors above ground and mezzanine level, as an addition to the existing B class floorspace at ground and mezzanine level.***

***Reasoned justification: Latimer Road was specifically cited by 23% of respondents to the StQW Survey as a part of the neighbourhood suitable for additional housing. Additional housing units in the street were approved by RBKC in 1992 (Westview Close) and in 2010 (290-294 Latimer Road). Further housing on the western side of the street would provide much needed activity and vitality to the street, increase footfall and viability for A class uses, and improve its safety and security. The urban pattern and building heights in the street would also revert to a form closer to their 19th century origins.***

#### **ACTIONS**

10i) to contribute to the RBKC Core Strategy Partial Review of Council policies on Housing

101ii) to work with local groups, Community Interest Companies and Community Land Trusts to explore the scope for self-build within the StQW Neighbourhood, in particular in Latimer Road.

# Health and Education

## Objective 11 *Protect local education, health and community facilities from commercial development pressures*

11.1.1 The StQW neighbourhood is not particularly well endowed with local facilities. Some have been lost in recent years and others remain under threat. The map below shows the main facilities in the area on which residents rely. The importance of these services remaining within walking distance, in a part of London with relatively low car-ownership levels, has been emphasised in responses to the StQW consultation survey.



Local facilities in the StQW neighbourhood (including the originally proposed part in LBHF not subsequently designated)

Insofar as policies in a neighbourhood plan can influence the availability of these facilities, there are limitations on what can be achieved through planning policies.

11.1.2 The two GP surgeries in St Quintin Avenue have been under threat of closure, with the site sold for residential development. Latest information is that this threat is not live at the moment, although there remains local concern as to what will be the eventual outcome of a current 'review of the primary care estate' being undertaken by the NHS West London Clinical Commissioning Group. Hence the site remains allocated in this Draft Plan for social and community use.

11.1.3 The St Charles Hospital lies just outside the boundary of the neighbourhood area. Services on this site have been reconfigured as the St Charles Centre for Health and Wellbeing. This provides a range of primary care services including a 66 bed renal unit, diagnostics including X-rays, ultrasound, echocardiography, and phlebotomy. A range of Community clinics are also available, and the walk-in Urgent Care facility is one highly valued by local people.

11.1.4 This hospital has not delivered Accident and Emergency services in recent years, and Hammersmith Hospital in DuCane Road has hitherto provided the nearest A&E. This service closed in mid 2014 as a result of the NHS reconfiguration in North West London. This leaves St Mary's in Paddington as the nearest A&E service for North Kensington, a source of concern to many residents.

11.1.5 In terms of education provision, the neighbourhood is well served at primary and pre-prep level, with Oxford Gardens Primary and Bassett House School. At secondary level, the new Kensington Academy and Leisure Centre has now opened in Lancaster Road, some half mile from the StQW neighbourhood.

11.1.6 Adult education facilities at Wornington Green (to the east of the neighbourhood) have been reduced as a result of redevelopment. The same applies to the Isaac Newton Centre of Ladbroke Grove, which has been leased by RBKC to the Alpha Plus Group for use as a preparatory school.

11.1.7 Westway Sports Centre, just to the south of the StQW area, provides a wide range of sports facilities. The STQW Forum has been seeking to build an improved relationship with the Westway Trust following a major review of the Trust's governance and objectives, and has been liaising on the future of the Trust's site at 301 Latimer Road (see under Section 12 below).

### **Social and community facilities**

11.2.1 The neighbourhood has long lacked any form of community building or meeting space, other than the local church hall. This hall is itself in regular use by Bassett House School and hence has limited availability for public meetings and other community events.

11.2.2 As explained in Section 4 of the Draft Plan, the West London Bowling Club is based on one of the original 'backland' sites incorporated in the original layout of the St Quintin Estate. The StQW Forum has worked with the club to increase its membership and widen its range of activities. Wider use of the clubhouse building has now added the stock of available community buildings, for meetings, lectures and other events. The building, the bowling green and its immediate surroundings has swiftly become a valued part of neighbourhood life, and is now a registered Community Asset.



*2014 Christmas Fair at the West London Bowling Club*

11.2.3 The approved scheme for the new development in Argyll Place (Pangbourne Avenue) includes provision of 440sq.m of 'community space'. It was on this basis that the development was deemed to meet the requirements of RBKC Core Strategy Policy CK1 in respect of loss of former hospital floorspace. This space is due to be used by a Montessori nursery school, and for a clubroom for a local youth football team.

### **HEALTH AND EDUCATION: DRAFT POLICY StQW 11**

***11a) To allocate the site of the St Quintin Health Centre in St Quintin Avenue for social and community use.***



***11b) In the event of any redevelopment of the site the St Quintin Health Centre, to require the developer to include floorspace at ground floor level to provide replacement accommodation for the two existing GP surgeries to remain at this location.***

**REASONED JUSTIFICATION** The Quintin Health Centre is the key health facility in the StQW Neighbourhood (the St Charles Health and Wellbeing Centre lying just outside the boundary). Proposed StQW Policies 11a and 11b are in general conformity with RBKC Strategic Objective CO1 on Keeping Life Local and Policy CK1 on protecting social and community uses.

**ACTIONS**

11i) Continued liaison between the StQW Forum and the NHS West London Clinical Commissioning Group over any proposed sale and redevelopment of the St Quintin Health Centre site.

# Managing development

Objective 12 *Manage new development in such a way as to conserve local character, in an area where land values are very high*

12.1.1 This section of the Plan brings together the various specific site allocations proposed elsewhere in the document.

12.1.2 As explained in sections of this Plan, there are few potential development sites in the StQW neighbourhood area. But where these do exist the Borough's enormously high residential land values incentivise commercial developers to aim for market housing above all other forms of development, and to maximise height and floorspace on any individual site.

12.1.3 Responses to the StQW survey show that residents are concerned that the features and characteristics of the neighbourhood are at risk from inappropriate development. To date, most of this development has been on the boundaries of the StQW area (particularly in Hammersmith & Fulham). There remain a small number of development sites within the StQW neighbourhood.

## 3-5 Crowthorne Road

12.2.1 This is an irregular shaped plot, 0.115 hectares in size, containing a vacant 1,235sqm part single, part two-storey building with a lawful Class B2 use. The building has been vacant since 2009. Planning permission for B1 offices was granted on this site back in 2001, but never implemented through lack of demand for office space at that time. A mixed use proposal was prepared, but withdrawn in 2011. A revised mixed use scheme, involving 20 new apartments and 178 sq. metres of B1 and A2 commercial space, was submitted in 2013.



Crowthorne Road site (in two parts, shown by the dotted brown line) behind Oxford Gardens

12.2.2 This scheme was refused by the council. The main grounds for refusal were loss of employment floorspace, and failure to meet affordable housing requirements, as well as impact on amenity of neighbouring properties.

12.2.3 It seems inevitable that a further application, exploiting the continuing sharp increases in residential land values in the StQW area, will be submitted before too long. The StQW Forum considers that this site is well suited for a mixed use development. This could be predominantly housing, given the existing lack of demand for B1 space in Latimer Road. Given the location (behind Lichfield Studios) studio/workshop space suitable for designers and creative industries might prove to be in greater demand than traditional small office suites.

12.2.4 Any development would need to respect the adjoining Oxford Gardens School and neighbouring houses, along with the fact that the site lies on the border of the Conservation Area, with long views towards it down Wallingford Avenue. In other respects, this site is seen as more suited for additional housing in the neighbourhood than is the Nursery Lane site (see below).

### Nursery Lane site

12.3.1 The planning history of this site, which is one of the original areas of 'backland' behind the terraces of Brewster Gardens, Dalgarno Gardens and Highlever Road, is explained under Section 4 of this Plan on Open Spaces.



Aerial view of Nursery Lane, showing the extent that mature trees have developed during the tenancy of Clifton Nurseries.

The existing sheltered housing scheme fills the southern part of this original 'backland' site, originally intended (and used) for communal sporting activities

12.3.2 Annexe B to Plan sets out the detailed case for designation of this site as Local Green Space.

12.3.3 **Views on the future of this site are particularly welcomed, as part of the 8 week public consultation on this Draft Plan.**

### 301 Latimer Road

12.4.1 This site lies in the Employment Zone section of Latimer Road, but has remained undeveloped since the late 1960s. The site is part of the large area of land managed by the Westway Trust, and sub-leased by RBKC to that body since the construction of the motorway. The freehold is held by Transport for London. A

series of applications for temporary use for the short-term storage of vehicles have been granted by RBKC, over recent decades.

12.4.2 The northern third of this site is due to provide the location of the entrance/exit to the proposed Latimer Road/Imperial West underpass. A planning application for this underpass was submitted in by Imperial College in September 2014, following negotiations between the Trust, the College and Network Rail.

12.4.3 In the past, the Trust has mentioned proposals to build housing units on this site. The most recent advice is that the Trust is reviewing the future use of the site and has no firm plans (as at October 2014). Given that the site has had only temporary uses for the past 50 years, this Plan proposes that the balance of the site (after construction of the underpass) should be reserved for a further 3 year period for potential future transport infrastructure.

12.4.4 As explained in Section 5 of this Plan on Transport, such infrastructure might take two forms:

a) a location for ascent/descent of cyclists at the western end of the proposed Westway section of the GLA/TfL east/west cycle 'super highway', allowing cyclists travelling to or from linked routes to the north (Old Oak) to avoid the already congested A40/Westway and Wood Lane junction.

b) a ticket office and entrance to Overground platforms at an additional station on the West London Line

12.4.5 Were no such proposals to emerge within a 3 year period from its adoption, this StQW Plan would support the use of the balance of the site at 301 Latimer Road for housing, as being in keeping with the Plan's policies for the future regeneration of Latimer Road.

#### **142a Highlever Road - St Quintin Garage**

12.5.1 This backland site has operated as the St Quintin Garage since the 1920s and currently houses a garage workshop, petrol pumps, and two rows of single storey lock-up garages. There is vehicle access (albeit narrow) via two private entrances off Highlever Road and Dalgarno Gardens.

12.5.2 Current RBKC Policy CK1 classifies petrol stations as a social and community use and protects them as such. In this unusual instance, the number of customers purchasing petrol at this 1920s backland garage is small. There is no signage whatsoever indicating a public petrol station at either of the entrances (this being a planning condition imposed as part of the 1930s approval to the installation of petrol tanks). The original intention was, and remains, largely to supply petrol to the users of the lock-up garages. Loss of the petrol sales function would have a very limited social impact on the neighbourhood.

12.5.3 RBKC Policy CR5(i) resists loss of light industrial space. The material use of the premises as a garage workshop pre-dates the Town and Country Planning Act 1932, and the planning history of the site relates only to applications made in the 1930s to install petrol tanks. Hence it is not clear whether there is an established use.

12.5.4 The current owner has no plans to dispose of the premises, which remain primarily a vehicle repair workshop. But given the questionable long-term viability of such an operation on this site, located as it is within what is now exclusively a residential area, this Plan proposes a future allocation for housing. This would need to be a form of low-rise mews development, so as not to harm the amenity of neighbouring houses in Highlever Road.

## St Quintin Health Centre and adjacent Kitchen Garden

12.6.1 This purpose built single storey local health centre opened in the 1980s and has since housed two GP practices. The registered owner of the site is NHS Property Services Ltd. The adjacent former tennis court forms part of the same landholding and in recent years has been used as a RBKC 'Kitchen Garden' (i.e. an area laid out with raised beds used by local residents as mini-allotments).

12.6.2 The NHS West London Clinical Commissioning Group has been carrying out a review of the area's 'primary care estate' and the outcome is awaited. Meanwhile this Draft Plan allocates this site for continued social and community use.

### **StQW Draft Policy 12**

**12a) to allocate specific sites within the StQW Neighbourhood, in accordance with the policies of the StQW Neighbourhood Plan, at set out in the table below:**

<b>POTENTIAL DEVELOPMENT SITE</b>	<b>USES PROPOSED UNDER StQW NEIGHBOURHOOD PLAN</b>
<b>Nursery Lane (Clifton Nursery)</b>	<b>Local Green Space in accordance with StQW Policy 4a</b>
<b>3-5 Crowthorne Road</b>	<b>In accordance with StQW Policy 10a, housing use with an element of B1 floorspace</b>
<b>Latimer Road Units 1-14</b>	<b>In accordance with StQW Policies 8b, 8c, and 10b, mixed use, allowing A1, A2, A3, B1, B8, D1 and D2 class commercial uses (excluding night clubs) on ground floor and mezzanine. Allowing residential or other C class use within redeveloped additional floors, within height limits set by StQW Policy 8e. Design Guidelines for redevelopment of Units 1-14 to be drawn up.</b>
<b>Latimer Road existing office buildings</b>	<b>In accordance with StQW Policies 8b and 8c, mixed use, allowing A1, A2, A3, D1 and D2 class uses, along with any B class use other than B2 and B8 (over 500 sq.m). Allowing residential or other C class use above ground floor, within height limits set by StQW Policy 8e.</b>
<b>301 Latimer Road</b>	<b>In accordance with StQW Policy 10a, housing use subject to the site being reserved for 3 year period for transport infrastructure.</b>
<b>St Quintin Garage (142a Highlever Road)</b>	<b>In accordance with StQW Policy 10a, housing use subject to density and heights causing no significant harm to the amenity and privacy of neighbouring dwellings in Highlever Road.</b>
<b>St Quintin Health Centre</b>	<b>Social and Community use, with any redevelopment to be subject to StQW Policy 11b requiring reinstatement of GP surgeries at ground floor level.</b>

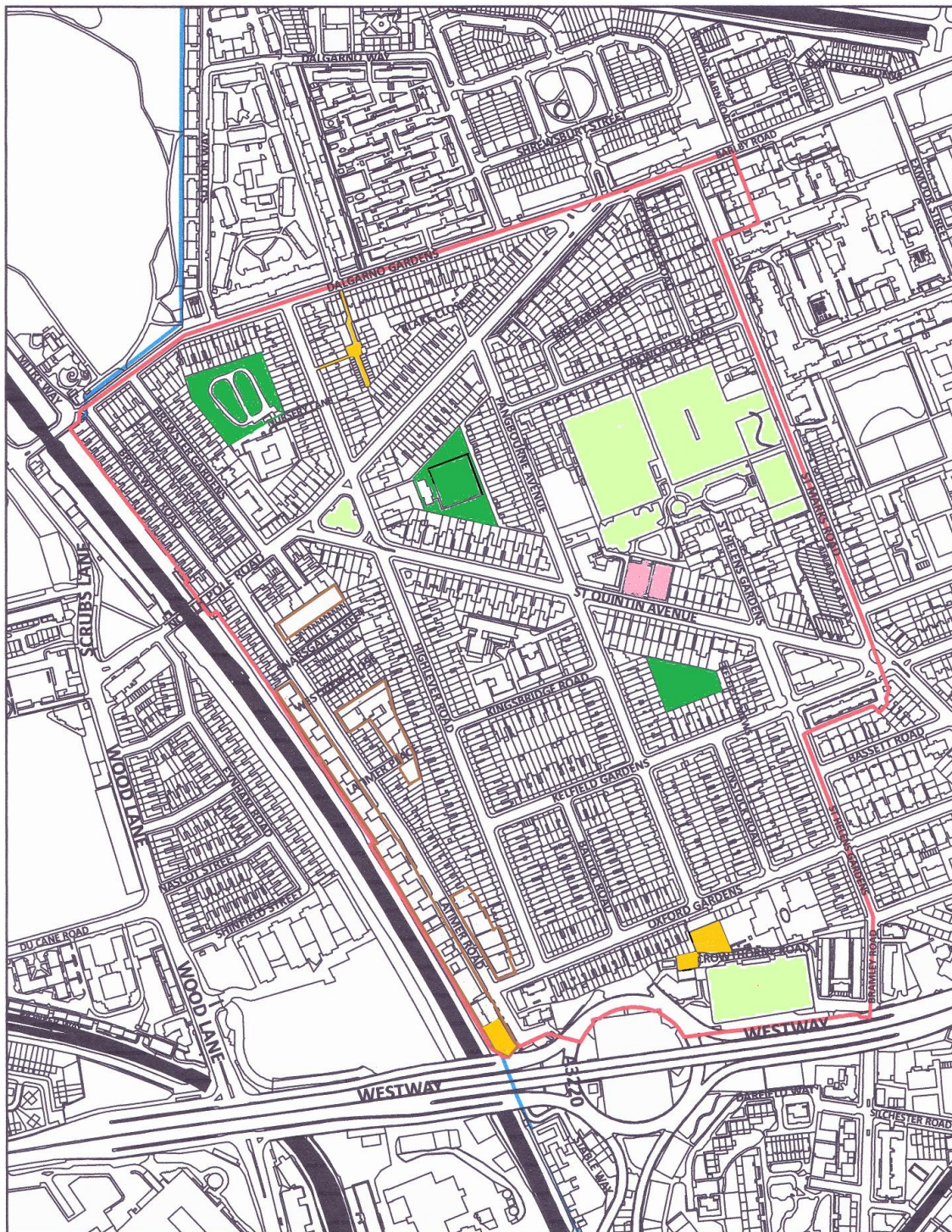


## **REASONED JUSTIFICATION**

As set out under each section of this Plan.

## **ACTIONS**

8i) to seek RBKC agreement to include as a condition of planning permission for any significant new development within the StQW area a requirement on developers to establish a liaison group with the StQW Neighbourhood Forum/St Helens Residents Association (and/or such other local group as is active in the area at the time) for the duration of the final design stage and construction programme.



# ST QUINTIN AND WOODLANDS NEIGHBOURHOOD PLAN

Key

- Sites proposed for designation as Local Green Space
- Development sites (Crowthorne Road, 301 Latimer Road, St Quintin Garage)
- Boundary of Latimer Road part of Freston Road/Latimer Road Employment Zone
- Site allocated to Social and Community Use (St Quintin Health Centre)
- Existing open space

## Proposals Map

December 2014

- Boundary of StQW Neighbourhood



## ANNEXE A HOW THE OBJECTIVES OF THE STQW PLAN RELATE TO THE THREE ROLES OF THE PLANNING SYSTEM, AS DEFINED IN THE NATIONAL PLANNING POLICY FRAMEWORK

<p><b>NPPF - the three roles of the planning system</b></p> <p><b>an economic role</b> – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</p>	<p>Objective 8 on <i>Keeping buildings occupied and in active use</i></p> <p>Objective 7 on <i>Safeguarding the commercial viability on neighbourhood shopping parades</i></p> <p>Objective 12 on <i>Managing new development</i></p> <p>Objective 9 on <i>Maximising employment opportunities</i></p>
<p><b>a social role</b> – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being</p>	<p>Objective 1 on <i>Keeping the area an attractive place to live and work, for this and future generations</i></p> <p>Objective 6 on <i>Maintaining security, safety and tranquillity in the area</i></p> <p>Objective 10 on <i>Seeking housing opportunities affordable to younger generations</i></p> <p>Objective 11 on <i>Protecting local health and education facilities</i></p>
<p><b>an environmental role</b> – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</p>	<p>Objective 2 on <i>Updating conservation policies to protect heritage while reflecting contemporary lifestyles</i></p> <p>Objective 3 of <i>Protecting the Environmental quality of the neighbourhood</i></p> <p>Objective 4 on <i>Protecting and enhancing open spaces</i></p> <p>Objective 5 on <i>Reducing traffic queues and improving cycle and pedestrian connectivity</i></p>

**Table 2 Relationship of StQW Plan to the 16 Local Development Framework Sustainability Appraisal Objectives identified in the 2009 RBKC Core Strategy Assessment.**

1. To conserve and enhance the natural environment and biodiversity	StQW Policy 2 on conservation aims to protect front and rear gardens from development and hard surfacing. StQW Policy 4 protects remaining open spaces.
2. To reduce crime and anti-social behaviour and the fear of crime	StQW Policy 6 aims to maintain safety and security in the area. StQW Action 4 aims to reduce of crime in North Pole Road
3. To support a diverse and vibrant local economy to foster sustainable economic growth	StQW Policies 7, 8 and 9 are designed to contribute to this objective
4. To encourage social inclusion (including access), equity, the promotion of equality and a respect for diversity	StQW Policy 1 places emphasis on neighbourliness and self-support within the local community.

5. To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change .	StQW Policy 5 proposes additional public transport, and reduction of emissions, through the addition of an Overground station on West London Line
6. To reduce the risk of flooding to current and future residents	StQW Policy 2 restricts use of non-permeable surfaces in front gardens, to reduce risks of flooding
7. To improve air quality in the Royal Borough	StQW Policy 5 proposes additional public transport, and reduction of emissions, through the addition of an Overground station on the West London Line
8. To protect and enhance the Royal Borough's parks and open spaces	StQW Policy 4 makes site designation proposals, to protect the remaining backland sites in the neighbourhood as Local Green Spaces.
9. To reduce pollution of air, water and land	StQW Policy 5 proposes additional public transport, and reduction of emissions, through the addition of an Overground station on the West London Line
9a. To prioritise development on previously developed land	StQW Policy 10 proposes additional housing on Latimer Road, above existing light industrial premises, while StQW Policy 4 resists residential development on open space.
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic	StQW Policy 5 proposes additional public transport, and reduction of emissions, through the addition of an Overground station on the West London Line. StQW Action 5 aims to reduce traffic queues and emissions at the North Pole Road/Wood Lane junction
11. To reduce the amount of waste produced and maximise the amount of waste that is recycled	StQW Forum supports the RBKC recycling policies.
13. To aim that the housing needs of the Royal Borough's residents are met	StQW Policy 10 aims to provide housing at (comparatively) affordable levels and therefore to meet the aspirations of residents within the neighbourhood.

14. To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials	StQW Objective 2 invites views on allowing insulation rendering of rear walls (not currently permitted under RBKC conservation policies.
15. To ensure the provision of accessible health care for all Borough residents	StQW Policy 11 is specific to this objective, in aiming to protect GP surgeries from residential development.
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage	StQW Policies 1, 2, 3 and 4 aim to maintain the distinct character and features of the neighbourhood area.

## ANNEXE B

### RBKC CONSERVATION POLICIES, ARTICLE 4 DIRECTIONS, AND THEIR RELATIONSHIP WITH NATIONAL RULES ON PERMITTED DEVELOPMENT.

#### What is permitted development?

B.1.1 Building owners can make certain minor changes to their property under 'Permitted Development Rights'. These are national planning rights, granted by Parliament and overriding what individual local authorities allow. These rights do not apply to flats or maisonettes.

B.1.2 Where changes or alterations fall within Planning Development Rights, planning permission is not required (although approval under Building Regulations may be). Building owners may wish to apply to the local planning authority (i.e. RBKC) for a Certificate of Permitted Development. This provides assurance to a subsequent purchaser that the works undertaken do not contravene planning legislation.

#### Article 4 Directions

B.1.3 Local Planning Authorities can remove specific Permitted Development Rights through the use of Article 4 Directions. Planning permission is then required. Use of these Directions to control development in Conservation Areas is a common practice.

B.1.4 RBKC has introduced many separate Article 4 Directions over the years. Those relevant within the StQW neighbourhood have been in place since the 1980s and are Directions numbered 46/62 (dating from 1977 and removing rights to alter roofs and front facades) and No.69 (dating from 1997 and removing rights to install hard surfaces in front gardens). **These Directions apply only to specified streets, or parts of streets, and not across the whole of the Oxford Gardens Conservation Area.**

B.1.5 Hence it is not straightforward for a property owner to establish what sort of alterations require planning permission, and what do not. The Government's Planning Portal at <http://www.planningportal.gov.uk/> is the most authoritative source of information. The RBKC website provides a street-by-street list of which Article 4 Directions apply in which areas.

B.1.6 The two Article 4 Directions currently in force in the Oxford Gardens CA cover the following works or alterations:

Direction 46/62 removes Permitted Development Rights on

- *'alterations, improvements and extension to any part of those elevations of a dwellinghouse which front onto a highway, being development comprised within Class I(i).'*
- *'alterations, improvements and extensions to any part of the roof of the original dwellinghouse', being development comprised within Class I(i).'*

The specific streets and part streets covered by this Direction are as follows:

Balliol Road Nos 1-25 odd 2-26 even inclusive

Finstock Road Nos 3-41 odd and 2-42 even inclusive

Highlever Road Nos 1-127 odd, 2-88 even inclusive

Kelfield Gardens Nos 15-21 odd, 22-33 odd, 2-46 even inclusive

Kingsbridge Road 1-23 odd inclusive



Oxford Gardens Nos 135-185 odd, 122-174 even inclusive  
St Helens Gardens 21-51 odd inclusive  
St Quintin Avenue Nos 1-31 odd inclusive  
Wallingford Avenue Nos 1-69 odd, 2-74 even inclusive

Direction 69 removes Permitted Development Rights on '*any provision of or extension to a hard surface for any purpose, which fronts a highway of any property in wholly residential use which is, or may become a dwelling house being comprised within Class F(i)*'

This Direction covers properties at the following addresses:

Barlby Road	1-65 odd, 2-34 even
Bassett Road	1-63 odd, 2-66 even
Cambridge Gardens	31-41 odd, 61-107 odd, 111-121 odd, 6-54 even, 60-112 even
Dalgarno Gardens	58-116 even
Highlever Road	1-127 odd, 131-143 odd, 147-173 odd, 2-104 even, 108-160 even
Oxford Gardens	5-109 odd, 38-46 even, 50-112 even
St Charles Square	43-69 odd, 2-38 even
St Helens Gardens	21-59 odd, 54-62 even
St Lawrence Terrace	1-25 odd, 2-24 even
St Marks Road	77-101 odd, 125-131 odd, 30, 36-68 even
St Quintin Avenue	1-33 odd, 37-67 odd, 71-83 odd, 2-24 even, 46-80 even
St Quintin Gardens	2-8 consec.

## **RBKC Conservation and Design Policies**

B.2.1 Chapter 34 of the Council's 2010 Core Strategy document is called 'Renewing the Legacy' and sets out conservation and design policies across the Borough. There are also a set of more detailed policies on conservation that were 'saved' from the former Unitary Development Plan, and which continue to be used by the Council in determining planning applications.

B.2.2 The Council has recently gone through an exercise of consolidating the 'saved' UDP policies and the Core Strategy policies into a single document, as part of a 'Partial Review' of the Core Strategy. This process is nearly concluded (as of late 2014) following an Examination in Public of the new consolidated policies. The new version should be formally adopted early in 2015. In the meantime, the RBKC website contains details of the 'submission' version of the new policies, and of the 'saved' policies.

## **The Oxford Gardens Conservation Area Policy Statement (CAPS)**

B.3.1 This document was first published in 1977 and updated in 1990. It can be found on the RBKC website alongside similar documents for other Conservation Areas.

B.3.2 The document sets out the history of the Conservation Area, with a commentary on aspects that need to be 'preserved or enhanced' to protect its 'character'. These are the terms used in the Planning (Listed Buildings and Conservation Areas) Act 1990, which sets the framework for conservation legislation.

B.3.3 The CAPS document, although several decades old, is regularly referred to in planning officer reports recommending approval or refusal to alterations to properties within the Conservation Area. The 1977/90 document contains a section headed 'Policy and Controls' which includes a statement saying that 'text in

**super bold type** signifies specific policies and proposals which the Council will implement using its town planning development control powers'.

B.3.4 It is important to note that such text no longer reflects RBKC 'policy' as such. While the Oxford Gardens CAPS document was formally adopted by the Council at the time of publication, more rigorous consultation and other requirements have since been introduced for the adoption of 'policies' within a Local Plan. The earlier CAPS documents do not meet these requirements and in recent years have had the status of 'policy guidance' only.

B.3.5 The existing set of CAPS documents is anyway being withdrawn by the Council and replaced by new Conservation Area Assessments for each Conservation Area (see below).

### **Conservation Area Appraisals (CAAs)**

B.4.1 The Council has been aware that its CAPS documents have become outdated and has embarked on the preparation of a new style document - the Conservation Area Appraisal.

B.4.2 The first few of these have now been prepared and consulted on. The Appraisal for the Oxford Gardens CA is currently in preparation, the Council having decided to bring this forward from its original planned date of 2016, in the light of the preparation of the StQW Neighbourhood Plan.

B.4.3 These new Conservation Area Appraisals will not set or change RBKC policy. Policy on conservation and design is set by the RBKC Core Strategy. The CAAs will form policy guidance and (as with the former CAPS) will be a material consideration in decisions on planning applications.

B.4.4 The Stated aims of the new-style Conservation Area Appraisals are to:

- define the historic and architectural character and appearance of the area
- identify what is worthy of conservation
- raise public interest and awareness of the objectives of the conservation area designation
- encourage public involvement in the protection of the area

### **How will the new CAA for Oxford Gardens relate to the StQW Neighbourhood Plan?**

B.5.1 The Oxford Gardens Conservation Area covers a wider area than the StQW neighbourhood (extending east to Ladbrooke Grove). The StQW conservation policies will hence apply to only part of the CA.

B.5.2 Subject to support in a referendum, the conservation proposals in the StQW Neighbourhood Plan will be 'policy' rather than 'policy guidance'. This is because neighbourhood plans (once adopted by the Council) form a statutory part of the Core Strategy/Local Plan. So the StQW policies will have a stronger role than the CAA as a material consideration in deciding planning applications. This is why it is important that the proposals in the StQW Plan are widely understood within the neighbourhood, and are supported by a majority at the referendum stage.

### **Enforcement of conservation policies**

B.6.1. Partly because of the complexities of the planning system, and partly because property owners may make assumptions on what works can be undertaken without planning permission, it is common for local planning authorities to take enforcement action on unpermitted alterations or conversion works.

B.6.2 RBKC regularly pursues enforcement issues in conservation areas, and has a larger and more effective team than in most London Boroughs. More details are available under 'enforcement' on the RBKC website. Ignoring planning requirements or Article 4 Directions can prove an expensive business, if e.g. roof alterations are required to be removed or parts of an original property reinstated.

B.6.3 The St Helens Residents Association has since 2008 routinely monitored the weekly list of planning applications in the StQW neighbourhood, and will submit comments to the Council where the Association feels that proposals contravene conservation area policies. The same approach will be followed as and when the StQW Neighbourhood Plan is adopted. It is in the collective interests of everyone in the area to ensure that the heritage value (and related property value) of houses and buildings in the area is maintained.

B.6.4 In certain respects, and particularly in relation to the rear of houses, the proposed StQW conservation policies involve some relaxation of current RBKC borough-wide policies. It is hoped that this will reduce the number of occasions when house-owners feel aggrieved, or unfairly treated, as a result of refusal of an application which appears similar to one approved in a neighbouring street.

B.6.5 It is hoped also to reduce the number of appeals to the Planning Inspectorate, from house-owners in the neighbourhood. Out of 26 planning appeals on houses in the StQW area, 10 have been allowed by Planning Inspectors since 2003. This suggests that certain RBKC policies are over-restrictive in relation to the types of house in this neighbourhood, and that a significant proportion of decisions are being overturned on appeal.

### **Applying for planning permission**

B.7.1 As this Annexe has sought to explain, it is not a simple matter for property owners in the StQW neighbourhood to know whether or not a planning application is required for what might seem to be a minor alteration. Nor whether approval from the Council will be forthcoming.

B.7.2 The policies proposed in this Draft Plan seek to vary some RBKC policies, to ensure that their application in the StQW neighbourhood becomes more consistent and fair. But even if this Draft Plan is supported at a referendum, it will still be the Council which makes the decision on an individual planning application.

B.7.3 RBKC takes conservation issues very seriously (as it should). We trust that when and if this neighbourhood plan is adopted by the Council, case officers making recommendations on planning applications will follow the policies set out in the Plan - rather than just carrying on as before. We believe the legal position to be that policies in an adopted neighbourhood plan, where specific on an issue, should prevail over those in the RBKC Core Strategy. RBKC planning officers suggest that this will be a matter of weighing up the two.

B.7.4 The StQW Forum will be monitoring closely how the Council determine planning applications once the StQW Plan is in place. In the meantime, the Council has suggested a series of points of which applicants for planning permission should be aware, in making applications in respect of roof alterations in particular:

- Traditional materials in keeping with the character of the conservation area should be used on facades visible from the street (e.g. painted timber, lead, slate/tile, etc)
- Windows facing the street should be in keeping with the original windows of the host house in terms of materials, finish and details
- Rooflights should be avoided on roof slopes facing the street (as per StQW proposed Policy 2b)
- Side roof slopes should not be extended. In particular ends of terrace are unlikely to have an appropriate style of roof on which to add an extension

- Development close to the edges of the roof should be avoided (i.e. keep rear dormers away from the ridge, eaves and party walls)
- Extensions on the roof of the 'outrigger'/original rear addition will be resisted
- Roof extensions should not cut into or cause the 'outrigger' to be altered externally
- Care should be taken not to use roof vents that are visible on the roof slope

B.7.5 For the Council, the overriding objective is for houses in a terrace to have a uniform design that complements that specific terrace. The StQW Forum supports this principle, provided that home-owners are able to make reasonable alterations to their properties to reflect contemporary lifestyles.

**Examples of rear dormer and boundary wall treatment considered as good practice within the StQW neighbourhood.**

B.8.1 The previous CAPS documents (now being replaced) included design guidance on rear dormers and front boundary walls. These guidelines gave examples of what was likely to be acceptable to the Council, in instances where planning permission for alterations is required. The new CAA documents will not include this form of advice.

B.8.2 This annexe to the StQW Draft Plan attempts to provide similar guidance, via the photographs give below and the pointers in paragraph B.7.4 advice. This advice should not be assumed as definitive, as it will be RBKC planning officers and not the StQW Forum, which will be making recommendations and decisions on planning applications. But this guidance should be of assistance to house-owners considering alterations to their property.

*(Photos to be added after discussion within StQW Forum. Those images suggested by RBKC not all seen as the best examples of boundary walls and rear dormers in place within the StQW neighbourhood).*

## ANNEXE C

### WHY THE NURSERY LANE SITE SHOULD BE DESIGNATED AS LOCAL GREEN SPACE

C.1.1 Paragraph 76 of the National Planning Policy Framework states:

*'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period'.*

C.1.2 Paragraph 77 sets out the criteria for designation of Local Green Space, as follows:

*The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

C.1.3 In the view of the StQW Forum, the Nursery Lane site meets the first and third criteria. RBKC officers have stated that it does not meet the second. This annexe therefore provides additional information to justify the designation of the site as Local Green Space, as proposed in this Plan.

C.1.4 Paragraph 4.3 of this Plan sets out the planning history of the Nursery Lane site. This area of backland was clearly originally designed as an integral part of the St Quintin Estate, and as an amenity area providing for communal sport and recreation. Until the 1940s it was used as a tennis club, and subsequently by Latymer School as playing fields, until the 1970s. Hence there is a history (albeit not recent) of community use.

#### **The site is not 'Previously Developed Land'**

C.2.1 'Previously Developed Land' is defined in the National Planning Policy Framework as follows:

*'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.'*

C.2.2 The land was zoned as 'private open space' in the Development Plans of the London County Council and Greater London Council. A tenant of the northern part of the original land was granted approval for limited use in connection with a garden contractors business. In 1959 planning permission was granted for a 'sectional timber hut' for use as a changing room for the playing fields. In 1960 Kensington Council advised that use of a wooden building as an office was permitted development, as an agricultural building.

C.2.3 Clifton Nurseries were granted approval in 1972 (following an appeal hearing) for the erection of two greenhouses on the site, and in 1981 were granted a renewed permission for a storeroom

C.2.4 An application by the Legard family in 1981, for a housing development, was refused by RBKC and an appeal dismissed. Apart from a further renewal of planning permission for Clifton Nurseries store building, there have been no further planning applications in relation to the site, to date.

C.2.5 The site has never contained non-agricultural or permanent buildings **and hence does not qualify, as Previously Developed Land**. The NPPF discourages development on sites which are not PDL, paragraph 111 stating: *Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value*. In this instance the StQW Draft Plan identifies several alternative brownfield sites in the neighbourhood as being suitable for housing development.

C.2.6 Paragraph 110 of the NPPF states *'In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework'*. The designation of the Nursery Lane site as Local Green Space is consistent with this approach, in its allocation of alternative (and previously developed) sites for future housing use.

### **The conservation value of the site**

C.3.1 The RBKC statement to the 1982 appeal hearing summarised the conservation value of the site as follows:

*'The proposal to redevelop the appeal site for housing purposes contravenes the approved policies of the Greater London Development Plan, the Council's District Plan, and the Conservation Area Policy Statement for the St Quintin Estate Conservation Area - all of these policies were only adopted and approved after long debate following full consultation.*

*It is considered that the proposed development results in an unacceptable loss of outlook and open space amenity and is detrimental to the traditional character of the area, The proposal makes no contribution to the preservation or enhancement of the character of the Conservation Area and is strongly opposed to by the local community'*

C.3.2 The similar clear statements in the 1975/1990 CAPS document, on the conservation value of the backland sites on the St Quintin Estate along with a policy commitment that they should not be used for housing, are set out at paragraph 4.1.4 of the main text of this Plan. There is also a specific extant policy CD31 on backland sites, 'saved' from the previous Unitary Development Plan, which resists loss of such sites where b) *the amenity of adjoining properties would be adversely affected*, c) *where there would be a loss of open space*, or d) *the character of the area would be harmed*.

C.3.3 The Council has a statutory duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have regard to preserving or enhancing conservation areas. There have been no significant physical changes to the layout and aspect of the southern part of the Nursery Lane site since the Council gave evidence at the 1982 appeal hearing. The amenity value of the site in terms of outlook and open space, and its contribution as an original feature of the Conservation Area, remain the same today as in 1982 This is the *'particular local significance'* and *'historic significance'* of the Nursery Lane site and part of the justification for designation as Local Green Space.

### **Bio-diversity and Wildlife**



C.4.1 Paragraph 113 of the NPPF states: *Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.*

C.4.2 Paragraph 118 goes on to say: *When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:*

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;*

C.4.3 RBKC has a Core Strategy 'Strategic Objective C07' for Respecting Environmental Limits, which states '*Our strategic objective is to respect environmental limits is to contribute to the mitigation of, and adaption to, climate change; significantly reduce carbon dioxide emissions; maintain low and further reduce car use; carefully manage flood risk and waste; protect and attract biodiversity; improve air quality; and reduce and control noise within the Borough.*'

C.4.4 The Nursery Lane site is one of many across the Borough shown as 'Garden Squares and other Green Spaces' on the Bio-diversity map at page 441 of the Core Strategy document.

C.4.5 While the threat of fluvial flooding in the Borough is low, the risk of flash flooding from overloading of the Counters Creek combined sewage/drainage system is significant. The Nursery Lane site lies within the Borough's Critical Drainage Area 1, with Flood Risk Assessments now required for all forms of subterranean development. The site is known locally to have a high water table, and to lie directly above on the of the tributaries of Counters Creek, one of London's 'lost rivers'.

C.4.6 The RBKC Core Strategy Policy CE2 on Flooding '*requires development to adapt to fluvial flooding and mitigate the effects of, and adapt to, surface water and sewer flooding*'. Paragraph 36.3.28 notes that the biodiversity resource in the Borough is remarkably rich. This is especially true of the Nursery Lane site, in which mature trees and areas of vegetation have been left largely undisturbed for decades.

C.4.7 RBKC Core Strategy Policy CE4 on Biodiversity states '*The Council will protect the biodiversity in, and adjacent to, the Borough's Sites of Nature Conservation Importance and require opportunities to be taken to enhance and attract biodiversity*'. The Nursery Lane site is close to the Wormwood Scrubs Nature Reserve (a Reserve across the borough boundary in LBHF, designated in 2002). Nursery Lane shares several of the rare bird populations, bats, butterflies, and mammals of this Sanctuary (where over 100 species of birds have been spotted).

C.4.8 '*Tranquillity or richness of wildlife*' form part of the criteria for designation of Local Green Space, as defined in the National Planning Policy Framework.

C.4.9 RBKC Core Strategy Policy CR6 on Trees and Landscape requires the protection of existing trees, and CR6(b) resists development which results in the damage or loss of trees of townscape or amenity value. The Council's Tree Strategy makes clear the importance to the Borough of mature trees in public parks, garden squares, and private open spaces.

## Open Space

C.5.1 RBKC Core Strategy Policy CR 5 on Parks, Gardens, Open Spaces and Waterways states that *'The Council will protect, enhance and make the most of existing parks, gardens and open spaces, and require new high quality outdoor spaces to be provided.'*

*To deliver this the Council will:*

*a. resist the loss of existing:*

*i. Metropolitan Open Land;*

*ii. public open space;*

*iii. private communal open space and private open space where the space gives visual amenity to the public'*

C.5.2 This policy is clear on extending protection to private open spaces, as well as public, where these give visual amenity. As evidenced by the Council's own statement to the 1982 Planning Appeal on Nursery Lane (quoted above at paragraph 11), the amenity value of the Nursery Lane site is the outlook it provides to some 60 houses which look onto it.

## Conclusion

C.6.1 The proposal to designate the Nursery Lane site as Local Green Space is therefore in conformity with Local Plan policies. The visual amenity and tranquillity of the site, with its very attractive mature willow trees, is a significant factor in meeting the NPPF criteria for Local Green Space.



## ANNEXE D

### COMMUNITY INFRASTRUCTURE LEVY

D.1.1 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.

D.1.2 Currently Mayoral CIL is charged in London. Kensington and Chelsea Council has been developing its Borough level scheme for CIL. This has yet to be adopted.

D.1.3 The Borough's proposed Community Infrastructure Levy, when brought into effect, will be payable on net additional floorspace for residential development, hotels, student accommodation and extra care housing.

D.1.4 The StQW neighbourhood is in Zone F of the Council's proposed Charging Schedule. Levels of proposed CIL charges for this Zone are £110 for residential and £20 for extra care housing (i.e. at the lower end of those charged elsewhere in the borough, reflecting lower land values).

D.1.5 As set out in CLG Planning Practice Guidance (Para 072) *In England, communities that draw up a neighbourhood plan or neighbourhood development order (including a community right to build order), and secure the consent of local people in a referendum, will benefit from 25 per cent of the levy revenues arising from the development that takes place in their area. This amount will not be subject to an annual limit.* For areas without a neighbourhood plan, the neighbourhood proportion of CIL is a lower figure of 15%.

D.1.6 In parished areas, these revenues go direct to the Parish Council. Where there is a neighbourhood forum rather than a parish council, the local authority is required to consult with the forum on the priorities to which CIL revenues should be allocated.

D.1.7 The Council has confirmed that the StQW neighbourhood would not be restricted by the RBKC's CIL 123 list, which sets the borough-wide funding priorities and can choose its own priorities for use the 25% neighbourhood element.

#### **Views would be welcome during the 6 week consultation on this Draft Plan**

##### **Initial suggestions are:**

- **streetscape improvements and other measures to improve the environment of Latimer Road**
- **CCTV in North Pole Road**
- **painting and removal of flyers beneath the North Pole railway bridge**
- **subject to successful temporary road closures in St Helens Gardens (section outside the church) installation of a shared surface on the roadway**

Comments and suggestions are invited on any or all the 12 sections on this Draft Plan, and you may have views only on only some of its proposals. All such views are welcome. **Please send comments by email to [info@stqw.org](mailto:info@stqw.org).** If you do not have access to email, and are reading a hard copy of the Plan, you can also comment by ringing 0207 460 1743 or writing to StQW Plan, 95 Highlever Road, London W10PW. .

St Quintin and Woodlands Forum management committee

November 2014