

KENSINGTON AND CHELSEA NEW LOCAL PLAN REVIEW

RESPONSES TO THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Policy SA9: Units 1-14 Latimer Road Industrial Estate

This is a modest site allocation concerning the future of a row of 14 light industrial/warehouse units

As set out in our representations on the Regulation 19 Draft, we consider that the 'effectiveness' of this site allocation has been improved by the adjustment to Policy B1 K. Two applications for redevelopment of commercial building on the west side of the street (including Unit 10 within this site allocation) have remained undetermined by RBKC after many months.

We therefore remain concerned that a housing trajectory which assumes 75 future new housing units in the airspace above Units 1-14 may prove optimistic, given that only one of these 14 has achieved a redevelopment consent since 2016. Only 5-10 new homes are forecast from this Site Allocation in Years 1-5 of the Plan and this should be achievable (and indeed may already have been achieved at Unit 1).

Demand for new housing in a mixed use and 'off-centre' street on the Borough border, adjacent to a rail line, may well recede in 2023. Our evidence amassed over many years continues to show that any redevelopment of Units 1-14 is marginal in terms of financial viability.

We therefore wish to remove any superfluous parts of Policy SA9 which act as an discouragement to development. Currently Site Allocation Policy SA9 F requires *High quality design that reflects the mixed character of the area and respects the Employment Zone identity*. We consider the last part of this sentence to be meaningless in the context of the street, which was built in the 19th century as a main north/south thoroughfare of mixed use terraced premises (including a series of laundries).

RBKC has adopted a Design Code for these units which sets parameters for the heights and elevations of any redevelopment of these 14 units. '*Respecting Employment Zone identity*' appears to be a requirement for the appearance of redeveloped units to have the appearance of 'commercial/industrial' premises in some way (undefined for applicants).

Given that one serious planning application at Units 1-14 has been refused by RBKC on design grounds (prior to the adoption of the design code) we see no meaningful purpose in such a local plan policy requirement. It is a potential extra constraint on sustainable development for no clear purpose.

Applicants are already required to navigate their way through a set of Local Plan policies, StQW neighbourhood plan policies, a fairly prescriptive design code, and the 2021 RBKC decision to include most of the eastern side of the street into the Oxford Gardens Conservation Area. This is a substantial set of regulatory obstacles which do not need to be added to in a Local Plan policy.

We therefore ask that Policy SA9(F) be amended as a minor modification, on grounds of **effectiveness**, to delete the words ***and respects the Employment Zone identity***.

St Quintin and Woodlands Neighbourhood Forum

June 2023