



St Quintin and Woodlands Neighbourhood Forum

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Chris Turner
RBKC Planning Department
By email

Draft 2nd June 2022.

Dear Chris,

RBKC revisions to Borough-wide Article 4 Direction

I promised to get back to you on the outcome of the discussion at our neighbourhood forum open meeting held on May 30th.

The discussion on future development in Latimer Road, and the approach that the Council is taking in meeting the Ministerial directive to review the present Article 4 Direction, was a lengthy one. The slides used at the meeting, to explain the implications of the street remaining within a set of revised and minimised areas covered by a Direction, can be downloaded from our website at www.stqw.org.

A hand vote carried out at the end of the discussion (with around 40 of our members present) showed a strong majority for the street to remain outside coverage of a revised Direction, and to join the many other streets in the Borough with an existing mix of commercial and residential premises to which national PD rights apply. Only 3 people voted against this option, with a number (around 10) choosing not to vote on what is a complicated issue.

The Forum's view on this issue has been consistent. In the 2014 Consultation Version of the StQW Draft Neighbourhood Plan, we included a proposed policy 8a stating:
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.

At the Examination of the Draft Plan, the Examiner modified our draft policies for Latimer Road while (as you know) accepting the case for introducing mixed use in redevelopments on the sites of Units 1-14 Latimer Road. The subsequent RBKC 2019 Local Plan introduced more scope for mixed use in EZs and assumes a housing trajectory of 75 new housing units through redevelopment of these 1980s light industrial/warehouse units. But only one such scheme, with 8 flats above commercial space, has been progressed to date.

We discussed at our meeting on 3rd June our experience of commercial activity in Latimer Road, including the vacancy levels that rise with each recession as a result of the location's poor public transport and lack of amenity. Our preferred outcome, as per the policies in the StQW Neighbourhood Plan, would be for ground floors of the commercial sections of the street to remain in active business use while new housing is provided above. For some buildings, conversion under PD rights to include an element of housing may provide viability for improving interior quality—including

'live-work accommodation which can attract the 'creatives' and small workshops which we have long sought to bring to the street.

We do not see evidence of '*a wholly unacceptable adverse impact*' resulting from Latimer Road being excluded from coverage by a new Direction. Rather the reverse. Depending on when and whether demand for commercial space picks up, we think it unlikely that there will be wholesale change of use to residential given the characteristics of the street. The location is not 'prime' Kensington and backs onto a railway line as you know.

What we do not want is a continuation of 'to let' signs for vacant office space, as experienced by the street in the decade since we embarked on a neighbourhood plan.

You undertook to pass on our representations to those at DHLUC dealing with a new Article 4 Direction. Just so that we know that the civil servants involved have the full picture, I am copying this letter to Stephen Gee and Suzie Willis at the Department, along with the representations which we made to the Council in previous consultation exercises on the present RBKC Direction, in 2017 and in 2021. In these we argued that the Borough-wide Direction ran counter to the policies in the StQW Neighbourhood Plan, and was a blunt instrument that did not serve well this small part of the Borough.

Given this context, we ask the Council not to propose the inclusion of Latimer Road in any proposals made to DLUHC in the current discussions on responding to the Minister's letter of February 28th 2022. We appreciate that final decisions lie with DLUHC rather than with the Council.

We also recognise that this course of action will impact on whether the four separate sections of the Freston/Latimer Employment Zone may be de-designated in the Council's new Local Plan. We will be happy to continue to discuss how best RBKC Draft Policy BC1 on Business uses can be drafted in the new Local Plan, prior to the Regulation 19 consultation.

Yours sincerely,

Henry Peterson
Chair, StQW Neighbourhood Forum

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cc Stephen.Gee@levellingup.gov.uk, suzie.willis@levellingup.gov.uk
Jon.Wade RBKC, Preeti Gulati Tyagi RBKC, StQW management committee members