Consultation Statement
Norland Neighbourhood Plan Submission

June 2013
Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012, which are set out below.

The Neighbourhood Planning (General) Regulations 2012, Section 15
(2) In this regulation “consultation statement” means a document which—
(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
(b) explains how they were consulted;
(c) summarises the main issues and concerns raised by the persons consulted; and
(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Background

The Norland Neighbourhood Plan is a culmination of many years work by the Norland Conservation Society. The Society approached the Council in 2008 with the wish to update the Conservation Area Proposals Statement for Norland, and over the last four years, has been preparing and developing the neighbourhood development plan.

The Norland Conservation Society has a vital role to play in guiding best practice and promoting quality, as well as developing the policies and guidance set out in this Neighbourhood Plan. We have 43 years experience of working to preserve and enhance the area, representing residents’ interests to Council Members, Officers and other bodies in the face of increasing development pressure.

Building on Existing Resource

The Norland Conservation Society is open to all those living and working within the Norland Conservation Area. It is fully constituted and has a membership of 350, which represents local interests to authorities such as the Royal Borough of Kensington and Chelsea, Thames Water and the Greater London Authority and acts on behalf of residents on issues such as inappropriate building development, traffic noise and illegal advertising.

The Society has a continued commitment to positive change in the area and engages with local residents, businesses and Councillors through regular meetings and newsletters.

Our ongoing programme of work includes:
- Reviewing and commenting on planning applications.
- Lobbying and working with council members, officers and representatives of other authorities such as Thames Water, The Great London Authority, TfL, English Heritage, local churches and other religious bodies.
- Working with developers, house owners and architects.

Specifically the Norland Conservation Society has effected important improvements in the area including:
- the pedestrianisation of Clarendon Cross, cutting off the flow of traffic through the heart of the area;
- challenging inappropriate building developments and alterations;
- developing guidelines for control of alterations to buildings;
- securing the replacement of garden square railings;
- unified external decoration schemes in Royal Crescent and Norland Square.
- reinstating York paving on many pavements;
- saving the St. James’s church tower from collapse by fundraising;
- new street tree planting, and saving important trees;
- securing FLIP protection for houses most prone to flooding;
- securing refusal of permission for back-lit advertisement hoardings around Shepherd’s Bush;
- setting up our Annual Lecture and Summer Garden Party to foster a real sense of community.
Neighbourhood Plan Consultation

Aims of Consultation
The principal aim of consultation undertaken during the preparation of our neighbourhood plan was to reach a plan that the whole community is happy with that will deliver positive development within the Norland Plan area and build on what makes it a desirable place to live and work.

The designated neighbourhood forum set out to achieve this through:
- raising local awareness of neighbourhood planning in terms of how it can be used and what it can deliver through sustainable development in this area
- talking to residents in Norland about their aspirations, issues and concerns
- working with the Council to explore heritage and planning matters and issues that could be addressed through this plan
- conducting a detailed audit of the streets and buildings in this area

The consultation targeted all those with an interest in the area. This included surrounding amenity societies, as well as residents and businesses within the area. The Norland Conservation Area is predominantly residential and responses and interest are thus primarily from local residents.

Steering Group
The Norland Conservation Society set up a Steering Group of five members and began to undertake work on the plan with support and input from a pool of 350 local residents.

Partnership
The Society has a long history of working with the Royal Borough of Kensington and Chelsea. Laying the groundwork for the plan, members of the Society worked with Council officers looking at the provision of Article 4s in the area.

Members of the Steering group have had regular meetings with Council officers from the Neighbourhood Planning and Conservation teams over a period of four years, during the preparation of the plan.

The group worked with the Council to apply for central government funding through the Frontrunner programme. This was secured during the fifth wave in January 2012.

Collecting an Evidence Base
Local residents and members of the Society volunteered to become street representatives and conducted a heritage audit of the area. The survey was conducted by these representatives in 2009-10. The buildings in each street, square and crescent are described in detail with recommended actions to enhance the character and quality of neighbourhood and individual buildings, as well as the overall ambience and the street scene. These street reports are supported by photographs illustrating all the buildings; they highlight problems to be resolved and suggest actions for improvement. It recognises existing Article 4 directions and, where applicable, recommends new ones. This document supports the Norland Neighbourhood Plan.

Designation Consultation
The Council consulted on the designation of the Neighbourhood Area and Forum in April 2012. Response was wholeheartedly in support and the area and forum was designated on 15th June 2012. Membership of the neighbourhood forum is open to anyone living or working in the area.

Consultation on Pre-submission Draft Neighbourhood Plan
The Sedley principles of consultation require that:
- consultation must be at a time when proposals are still at a formative stage
- the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response
- adequate time must be given for consideration and response
the product of the consultation must be conscientiously taken into account in finalising any proposals.

As part of the preparation of this plan, the following consultation was carried out with the local community in Norland.

**Communication and Publicity**

The Neighbourhood Forum was able to use some of the Frontrunner funding to prepare some consultation materials. This enabled us to reach all households and businesses in the area. An illustrated four-page colour leaflet (Appendix A) was prepared setting out the Norland Conservation Society’s (as the Neighbourhood Forum) proposed vision and aims for the area. The leaflet asked for views on the draft plan and proposals in it by post or online (via the Norland Conservation Society’s website) and included a short questionnaire for this purpose. It was posted personally by members of the Forum Committee to each of the 1900 properties in the Neighbourhood Area.

The draft Neighbourhood Plan was available for consultation and comment between 20 June and 1 August on the Norland Conservation Society website. A hard copy of the draft neighbourhood plan was available at the Town Hall and in local libraries:
- Kensington Town Hall, Planning Information Desk
- Kensington Central Library
- North Kensington Library

Responses were encouraged:
- **Online** - through our website www.norlandconservationsociety.co.uk
- **By post** - using the short questionnaire
- **In person** - at a walk-in public consultation event

The Council promoted the draft plan via its weekly Planning bulletin, and there has been information available on the Council’s website since the autumn of 2011.

The draft plan was also promoted through the Norland Conservation Society’s existing contact base. A request for views and input was made through the Norland Conservation Society's newsletter and at the AGM in June 2012, at which some 80 members attended. The Council’s Neighbourhood Planning team introduced the neighbourhood planning process, and members of the Neighbourhood Forum’s Steering group presented their work on the Neighbourhood Plan to date. Attendees were reminded of the importance of this consultation and entreated strongly to respond. Shortly before the consultation period ended all members of the Norland Conservation Society with email subscription were again contacted about the consultation and the importance of their responses.

A walk-in public consultation event was held in St James’s Church 4:30pm - 7:30pm on 9th July 2012, visited by residents, officers from the Royal Borough of Kensington and Chelsea’s Neighbourhood Planning Team and representatives from the Department of Communities and Local Government.

**Consultation Strategy Summary**

<table>
<thead>
<tr>
<th>Method</th>
<th>Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leaflet</td>
<td>A leaflet was prepared setting out the Norland Neighbourhood Forum’s proposed vision and aims for the area. This was delivered to each property in the area.</td>
<td>June 2012</td>
</tr>
<tr>
<td>Questionnaire</td>
<td>A questionnaire asking for views on the principles of the plan by post or online was delivered to each property and made available on the Norland Conservation Society website.</td>
<td>June – September 2012</td>
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<tr>
<td>Website</td>
<td>The draft Neighbourhood Plan was made available on the Norland Conservation Society’s website and as hard copy at the Town Hall and in local libraries.</td>
<td>20th June – 1st August 2012</td>
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<tr>
<td>Meeting</td>
<td>Norland Conservation Society AGM importance of this consultation and entreated strongly to respond</td>
<td>21st June, 7.30pm St James’ Church,</td>
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</table>
Email newsletter | Email newsletter to Norland Conservation Society members the consultation and the importance of their responses. | August 2012
---|---|---
Public Meeting | A walk-in public consultation event was held in St James’s Church. | 4:30pm - 7:30pm on 9th July 2012.

### Results

In total, 53 responses to the questionnaire were received: 34 through the website and 19 by post. The results are summarised graphically in Appendix B.

The main issues broadly focused on extensions and modifications to properties; sustainable materials; roads and movement; streetscape; and the management of the area. More detailed comments and responses are included below.

As a result of the walk-in session, a group of residents became involved in the development of the plan after the consultation closed. Whilst generally few concerns were raised about the proposals’ particular approach to development, the group of respondents, at the north end of Portland Road, considered the proposals too restrictive for their area to particular local circumstances. Discussions were held, and, as a result, a number of modifications were made to the Neighbourhood Plan and included in this second draft.

There were further suggestions for modifications, which have been addressed in the revised plan; several letters of appreciation and thanks were also received.

### Addressing Responses

The following table lists the concerns and suggestions raised, and how these have been addressed:

<table>
<thead>
<tr>
<th>Issue raised</th>
<th>Neighbourhood Forum Response / How addressed in Neighbourhood Plan</th>
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<tbody>
<tr>
<td><strong>Neighbourhood Area</strong></td>
<td></td>
</tr>
<tr>
<td><strong>North Portland Road</strong>&lt;br&gt;This street should be excluded or the plan modified to allow different standards to apply to different parts of the neighbourhood. Historically all the houses in the neighbourhood were built at different times and in different circumstances and the plan should allow for this. Further consultation should be undertaken and the views of others taken on board.</td>
<td>Meetings held with representatives from North Portland Road, at which detailed case was made for treating North Portland Road differently in these respects. This case is made in detail and at length in a special Appendix D to the report, and modifications included in the main report text to include these policy exceptions. Guidelines specific to North Portland Road are included in Appendix D.</td>
</tr>
<tr>
<td><strong>Conservation area boundary</strong>&lt;br&gt;The west side of Norland Road should be included within the conservation area</td>
<td>We should look into this, but not within the drafting of the neighbourhood plan.</td>
</tr>
<tr>
<td><strong>Sustainable Materials</strong>&lt;br&gt;Double glazing makes a significant contribution to reduction of energy usage and should be encouraged, even in listed buildings. Double glazing has now developed so that there should be no need for compromise on glazing bars etc. Ban on double glazing in the fronts of listed buildings.</td>
<td>We have included a paragraph: &quot;In the interests of energy conservation, our intention is to investigate the availability of double glazing systems which would be acceptable to English Heritage for use in Listed Buildings. To the extent that such are available, we will recommend them for use in both Listed and Unlisted buildings in the Conservation Area.&quot;</td>
</tr>
</tbody>
</table>
### Materials in rear extensions
Glass panels allow massive light improvement with consequent energy saving. Sympathetic use of glass can also enhance the quality of living spaces. There should be no such presumption against the use of glass in rear extensions.

The presumption is against “predominantly” glass structures – in other words, the kind of greenhouses which have recently been attached to the rear of houses (often Listed Buildings) as family room extensions, quite out of keeping with their surroundings. NB an exception is made for infills between two existing rear extensions. Most recently, these are not being allowed on grounds of poor energy efficiency/loss of heat through the glass. Most recently, these are not being allowed on grounds of poor energy efficiency/loss of heat through the glass.

### Solar panels
These are again positive for the environment. There are many buildings (e.g. Norland Square west side) with centre gully roofs where solar panels could make a worthwhile contribution without adverse visual impact. There should be no presumption against solar panels.

The plan does not “presume against” solar panels: it proposes that they should only be permitted in discreet locations that would not harm the setting of any listed buildings or vista within the conservation area. This is supported by RBKC Conservation Officers, and in line with best practice.

### Flooding
There is a minor statement about flooding in the subterranean section but it is not enough. Flooding through the area has been a major problem for years. Even though it may be a sore spot and there is the fear of harming property values, it should be mentioned in relation to promoting permeable surfaces and sustainable drainage devices. Not mentioning it is a bit of head in the sand.

In 4.2.8, we have now included: This is reinforced by concern about the effect of subterranean developments on natural watercourses, as pointed out in the Baxter report. Both considerations are particularly important to reduce risk of sewage flooding, which has been a major problem for years. The Society will object to any planning applications which adversely impact the extent of permeable surfaces, and encourage their re-instatement wherever possible.

### Extensions/Modifications to Properties

| Roofline alterations/additions | Meetings held with representatives from North Portland Road, at which detailed case was made for treating North Portland Road differently in these respects. This case is made in detail and at length in a special Appendix D to the report, and modifications included in the main report text to include these policy exceptions. Guidelines specific to North Portland Road are included in Appendix D |
| Rear extensions and garden buildings | See above |
| Extensions | The importance of retaining families in Norland is given additional emphasis under Vision. But in principle we oppose subterranean development where houses already have deep basements. This will be addressed within revised Basements policies being included in the Local Plan. |
| Interiors | The plan proposes “encouragement” to retain original features and room layouts; and admits this is not a matter for planning control in Unlisted building |
| Terraces | Added to last paragraph of section 4.2.2 of the plan. |
**Interior lighting**

I do not see anything about exterior lighting. There are several cases on the southern end of Addison Avenue where exterior lighting has been added. Though opposed by many including the Kensington Society, the planning department said there are no controls over such inappropriate, modern lighting. This should be added to the controls.

<table>
<thead>
<tr>
<th>What controls could be introduced? Could this be considered as covered by Class A Part 1 Schedule 2 - “The enlargement, improvement or other alterations of a dwelling house”</th>
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**Exterior Painting**

While agreeing with the principle that listed terraces such as Norland Square should follow a single colour scheme, I do not agree that article 4 directions should apply elsewhere. This is an undesirable bureaucratic constraint on peoples’ freedom to express themselves. I do, however, agree that the principle of maintaining the integrity of mouldings and other features is important.

<table>
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<tr>
<th>The Art 4 directions will specify Hopsack BS4800 10 B 17 for 2A – 28 Queensdale Road, and Norland Place, in addition to Norland Square. Elsewhere (except Royal Crescent of course), owners will be free to choose their own “pale pastel colour”. In addition white or an off-white stone colour will be specified for stucco decoration/detailing throughout the CA, which you agree with.</th>
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**Streetscape**

| One of the charms of Portland road is the colour of the houses — again in a grand garden square like Norland it may be more appropriate to ask residents to keep their colours to a certain beige palette but for the modest terraces colour can only add to attractiveness and eccentricity of the street which has historically had gypsy and bohemian antecedents. |
| At these meetings, the intentions behind the paint colour proposals were clarified, and accepted. (There was apparently some misunderstanding of what was intended.) |

**Roof planting and furniture**

Within the brief statement on (d) Roof gardens and terraces, there should be mention of roof planting and furniture. Walk down Princedale Road and unfortunate appearance of variety of umbrellas, heating units, and plants which destroy the line of the terrace. Even 43 Portland Road with its poodle plants is unattractive and distracting to the architecture. There should be controls in place where any terrace must be set back from the road by 1m and no plants, furniture, umbrellas etc. visible from the street.

| We wanted to include just that, but they are not subject to Planning Control. |
| Text amended to say: “Enclosures, furniture, parasols, trees or shrubs should be as unobtrusive as possible from all viewpoints, and not be visible from street level on the opposite side of the street. “Roof terraces will be subject to a condition requiring the Council’s approval of enclosure design and materials, landscaping, planting and furniture, in order to avoid compromising rooflines.” |

**Front boundary enclosures**

Walls, railings and fences should also address the terrace houses which do not have front light well. There should be an Article 4 Directive preventing light wells in a line of terrace houses where there are none. This is particularly important on the Princedale Road and the south end of Addison Avenue.

| This is taken care of by proposed Article 4 Directions Class A Part 1 Schedule 2: “The enlargement, improvement or other alteration of a dwelling house” |

**Reinstatement of railings**

There should be a statement about encourage the reinstatement of railings where there are fences? I am thinking of St James’s Lodge.

| This is covered in Chapter 4 – ‘Wrong or missing railings/enclosures’ |

**Historic street furniture**

The post box at the corner of Princedale Road and Holland Park Avenue is listed and should be mentioned. There should be protections for all our historic post boxes. I would not count on the Government allowing them to be changed to structures which have advertisements on them.

| Yes, good points. Included in Chapter 4 |

**Advertising on street furniture**

There should be blanket policy for ‘no adverts on street furniture’. If the past year has been any indication that

| Yes, good points. Included in Chapter 4 |
there will be more inventive ways to advertise… we will continue to have to fight advertisement. There should be controls that prevent the uses of hoarding as signage other than safety requirements. As for street furniture, if there are no protections we will see almost anything with an advertisement on it.

**Advertising Hoardings**
Advertisements on hoarding should not be allowed. The plan might want to review the problem with 168 Holland Park Avenue where Mr Coey says “there are no provisions in the legislation to enforce removal of these advertisements” in the front of the listed building.

**CIL**
Proposals to use Community Infrastructure Levy to fund various street scene improvements, extension of pedestrianisation at Clarendon Cross, measures to reduce rat-run traffic through Clarendon Cross.

Good idea. Taken up in Chapter 4 of the Plan

**Trees**
3.2.3 provides that protected trees should be felled only when dangerous. I disagree. In the case, for example, of Norland Square, it would make sound arboricultural sense to phase the removal and replacement of the mature trees (now well over a century old) over a long period to avoid too much devastation when the existing trees come to the end of their natural lives. This is a long term policy, but trees last a very long time, and tend to die off together.

Trees in Square Gardens are a matter for the Square Garden Committee, subject of course to permission for felling, pruning and replacement from the Arboricultural Officers. Of course, individual owners are responsible for their own trees. The NP concern in 3.2 is to protect against wanton removal of trees in private gardens to make room for subterranean developments.

We endorse the keeping of trees but believe you should be allowed to remove a tree if you can replace it with something more suitable for the small back gardens that we have.

**Roads/Movement**

**Traffic**
The statement “traffic from the east heading north, by-passing Holland Park Avenue by taking Pottery Lane and the north side of St James’s Gardens” does not cover it completely. Most of the traffic we see on the north side comes up Princedale Road onto the north side St James’s Gardens then to St Ann’s Villas and the verse. This is also the case in the section 4.5.1

Altered as follows:
"traffic from the east heading north, by-passing Holland Park Avenue by taking Pottery Lane or Princedale Road, and the north side of St James’s Gardens"

We would endorse any plan to slow down traffic travelling down Clarendon Cross and support the Zwart’s suggestion for more raised paving.

**Parking**
Royal Crescent : Though mentioned in the parking section, there should be some comment here about the threat to the residential parking which Westfield has caused. With an increase of 45% of the shopping centre recently receiving planning permission, the situation will only worsen.

We cover this as far as we can for now in Section 3.4

**Area Management**

**Vandalism**
We support the parts of the plan that refers to tidying up of streetscapes. And we would endorse any plan that could reduce vandalism, particularly of trees planted in the pavements and better manage litter dropping or dog fouling though we would hesitate to endorse cctv cameras unless they were well and discretely positioned.
**Enforcement**
There must be a system which ensures enforcement of the agreed regulations. This does not appear to exist at present. Examples are the telephone box advertising, bad double glazing in Norland Square, use of non-standard paint colours in Norland Square, posting of flyers etc on railings and lamp-posts. If the regulations cannot be enforced they should not be set out as mandatory rules, but as principles for neighbourly behaviour.

You’re absolutely right about the need for enforcement; we are constantly only too aware how short-staffed the planning authority’s Enforcement team are. This is where our, and our Members’ vigilance is important, firstly to draw enforcement’s attention to breaches (eg Newsagent at end of Addison Avenue which is currently being pursued by Enforcement at our request), and second to follow up to make sure of the right resolution.
Norland Neighbourhood Plan

To continue and build on the conservation work of the past 43 years, we are making use of new neighbourhood planning powers. The Norland Conservation Area has been designated a neighbourhood area and the Norland Conservation Society as the neighbourhood forum for this area.

Our vision

Enhance and protect the character and historic features that define Norland's sense of place - in terms of townscape, streetscape, landscape, and neighbourhood, by means of:

Guidelines for exterior painting to enhance the conservation area
Guidelines for rear extensions, conservatories and garden buildings (including sheds) to protect gardens and the backs of houses
Guidelines for external painting to enhance the conservation area

The aim of the Norland neighbourhood plan is to protect and enhance the character and historic features that define Norland's sense of place - in terms of townscape, streetscape, landscape, and neighbourhood, by means of:

Further action to mitigate traffic problems

To support our neighbourhood plan the Council is consulting from 20 June - 1 August (these are things that can normally be done without planning permission) through Article 4 Directions for:

External painting; alterations to architectural features; large garden sheds and other garden buildings; removing front garden enclosures for car parking
Appendix B: Questionnaire Results

Where do respondents live?

Do you agree with the aims and policies of the neighbourhood plan?
Relative importance of conservation issues

Of these, which is most important?
Effectiveness of neighbourhood plan policies

![Bar chart showing the effectiveness of various policies in the Norland Neighbourhood Plan. The chart indicates the number of respondents who agree very strongly or strongly with each policy. The policies include enhancing the area, providing sufficient control to mitigate any adverse impact, protecting architectural features, and reducing traffic and noise.]