

Mr. Michael French
Royal Borough of Chelsea and Kensington
Town Hall
Horton Street
London W8

Dear Mr. French,

The late Sir Nikolaus Pevsner - in London I: The City of London, the cornerstone of The Buildings of England, his unrivalled series of comprehensive architectural guides - described the rebuilding of Sir John Soane's Bank of England as "the single worst act of architectural vandalism in the City of London in the 20th century".

No mean feat that, particularly when you think of the contribution of the Luftwaffe toward that particular

Now, not to put too fine a point on it, the Thames Water proposal to redevelop the resevoir site east of Holland Park - putting two huge blocks of flats there that will completely transform the area - stands in that very line. I.E., if that "redevelopment" goes ahead it will be "the single worst act of architectural vandalism in Chelsea and Kensington in the last 250 years".

The Brave New World of the new Millennium, compliments of Thames Water.

Please stop them, for they know not what they do.

And for what it's worth, I speak not as a resident but as an outsider - i.e., the proprietor of the oldest walking tour company in London. We take people - visitors and Londoners - on walking tours in that area. The people who go on that walking tour take great delight in that neighbourhood - precisely because it is an unspoiled and well preserved part of London.

And so it should remain.

The vandals should be kept at bay.

David Tucker

Best regards

(

15 Campden Hill Square Kensington London

W8 7JY

Tel: 0171 727 4348 Fax: 0171 221 2830

18th January 1999 1

The Editor
Kensington & Chelsea News
London Newspaper Group
Newspaper House
Winslow Road
Hammersmith
W6 9SF





FOR THE ATTENTION OF OONAGH HAYES

Dear Sir,

Your article last week regarding the development proposals for Thames Water Campden Hill site quotes the company as stating, "It is a very important scheme for us which we want to get right...". We should bear in mind that Thames Water is a large and very profitable company which has emerged from a former public utility. Their proposed development and their complete disregard for the Kensington and Chelsea Unitary Development Plan (UDP) can only be driven by their desire to maximise profits for their shareholders. This 'duty' to maximise profits was acknowledged to local residents at meetings with Thames Water some months ago.

What has enraged local residents is the contempt that Thames Water has so far shown. The UDP, which was adopted in August 1995, took some years to bring to fruition after much consultation, a Public Enquiry and eventual approval by the Secretary of State. We are entitled to rely on it to protect and enhance the environment in which we live. It recognises that the borough has the highest residential density in Great Britain and, whilst seeking to provide further new homes on suitable sites, it vigorously seeks to protect the few remaining important open spaces and This is not a suitable site for outdoor recreational playing spaces. Michael French, the Director of Planning development. Conservation, wrote on 24/11/95, specifically referring to the Campden Hill Tennis Club site, "... we have in our UDP set out policies which are intended to preserve and enhance existing open space whether this be public or private. Any redevelopment of the site would in my opinion, be contrary to these policies and given the Plan-led system within which we now operate, would be refused." Any change in this stance by the Council or the Secretary of State would make a mockery of the UDP and the entire planning process.

The existing tennis courts are used not only by the club but also by the comprehensive school. Outdoor recreational space is a scarcity of great value to the borough. The Councils Open Space Survey of 1992 includes the Campden Hill Tennis Club site as fourteenth of a total of 38 public open spaces which need to be protected and it is recognised that most of the borough's land area is sadly deficient of open spaces. It is no answer to provide underground tennis courts in this context.

I have concentrated in this letter on one aspect only of this important site. Equally important objections have been made by others (including the Campden Hill Residents Association which has a large membership) regarding serious traffic and parking problems, the importance of the listed buildings and the Church in Aubrey Walk and the general environmental degradation that the proposed scheme would have.

If Thames Water wish to succeed with any residential development of this site they must go back to the drawing board and produce a limited high-quality proposal for a sensitive low-density scheme at the Water-Tower-House end of their site. They should stop acting as the local bully-boy and respect the open space of the site generally, the tennis club in it's entirety, and the important listed buildings, the church, and the general ambience of Aubrey Walk in particular. Outsiders should not be allowed to drive a coach and horses through the UDP in order to swell the profits of their shareholders. This is too important a site within our borough for us to allow this to happen.

Your faithfully,

HAMISH WATSON

Hamish Watson

(Treasurer - Campden Hill Square Gardens Committee)

St George's Church Aubrey Walk LONDON W8 7JJ



19th January 1999

M J French Esq Director of Planning & Conservation The Royal Borough of Kensington & Chelsea The Town Hall Hornton Street LONDON W8 7NX

Dear Mr French,

PROPOSED DEVELOPMENT OF WATER TOWER HOUSE AND RESERVOIR SITE AT AUBREY WALK BY THAMES WATER

I write on behalf of the Committee of St George's Church to object to the plans for the above submitted by Thames Water.

St George's Church has been extensively reordered and refurbished during the last four years, including the cleaning and restoration of the exterior for which we received a grant from the Council. Our building project created St George's Centre at the back of the Church, which is space for community activities, completed late in 1998. A steady build up of demand for use of this space has begun. The Church congregation itself has grown fourfold in the last four years and is still rising rapidly from its present level of 150 per week. Much of the rise in the congregation has occurred during the working week as the number of services has grown from 3 per week to 8.

Our refurbishment cost of £600,000 was mainly funded by our congregation of local people, who accepted the growth in activity around the Church, as it was to **meet the needs of the community** and not for profit. The traffic build up relating to the Church has **only just begun** and our deep concern is that you might not be aware of the further steep increase expected which will affect the traffic flows and demand for parking.

Our second concern about the scheme is the failure to allow for low cost housing. We understand this to be a legal requirement and we object most strongly to any proposal which fails to make provision for socially necessary housing. We have close links with the Notting Hill Housing Trust, whom we support, and consider that they, or a similar organisation, should have an allocation particularly as the present occupants of Water Tower House are among the lowest paid local residents.



Our last objection concerns the effect of the development programme upon our fabric and upon our activities. Aubrey Walk is already closed during the works connected with the shaft and we are already having serious problems with access to the Church and its visibility. We know that the construction of the shaft is considered necessary in the interests of the community and we can accept the problems caused by it (though we may require some compensation) but this proposed development has only the objective of creating profit for the shareholders of Thames Water at the expense of our congregation.

Yours sincerely,

Angela Coscelles

Mrs Angela Lascelles Warden, St George's Church

c.c. The Bishop of Kensington
The Archdeacon of Middlesex
The Reverend Michael Fuller
Councillor Christopher Buckmaster
The Chairman of Notting Hill Housing Trust

OPC Sellwood Rlanning artered Town Planners hartered Surveyors

19 January 1999

Ref:

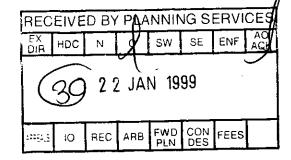
RMS/StJ/CAM/99015

Director of Planning & Conservation Royal Borough of Kensington & Chelsea The Town Hall Hornton Street London **W87NX**

FAO: D Taylor

Highgate House Bambers Green Takelev Bishop's Stortford Herts CM22 6PE

Telephone (01279) 871799 Facsimile (01279) 870790 Mobile 07801 321162



Dear Sir

Applications by St James Homes Ltd. Campden Hill Reservoir

Further to the recent meeting with Derek Taylor I enclose a copy of the summary of the feedback from the public exhibition held in December.

The schedule at the rear is useful in demonstrating the extent of the public consultation exercise undertaken by St James over the last couple of months and the range of views expressed.

Yours faithfully

Paulin Dennark

R M Sellwood

Encl.

St James Homes - Campden Hill

Public Exhibition 10-12 and 18-19 December 1998

Summary of feedback



The exhibition was held at 188 Kensington Church Street over a total of five days, including one Saturday. Adverts were placed in the local press over two weeks and 5,000 invitations were distributed, in advance, to local homes and businesses.

324 members of the public attended the exhibition, of whom 66 made written comments. Over two-thirds of comments were supportive of the scheme or indicated no view. Less than 20% of those attending opposed the scheme outright. More detailed statistics are attached to this summary.

The following excerpts from the comments book give a representative flavour of comments received.

Many positive comments were received about the development:

Density is perfectly in line with the surrounding area.

Quality of design is very encouraging.

Pleased to see the back of Water Tower House.

Much better than previous schemes.

A great deal of thought appears to have gone into the scheme - the 3D model was very helpful.

A great addition to the neighbourhood - a first class development.

A challenging site - residential use is obviously sensible and the proposals appear to be sympathetic to the surrounding architecture.

Great - it will bring some new life to Notting Hill Gate.

Overall an impressive and realistic development.

A good development plan - I fully support it.

A most attractive scheme and a brilliant use of the land.

Actually, I rather like the scheme, but I'd better not write too much down in case my neighbours see it! (an Aubrey Walk resident).

A superb scheme.

Since development is inevitable the scheme seems satisfying in general.

I think the apartments are very tastefully done - the fear of course is the price.

Perhaps the biggest concern of local residents is the impact of the scheme on local traffic and parking:

I'm concerned about access to the car park.

Concerned about traffic at junction between Aubrey Walk and Campden Hill Road.

Concerned about increased traffic congestion and safety.

Would like more on-site parking.

Wondered if vehicle access could be provided via Kensington Heights.

Anxious about population and traffic increase.

Concerned about traffic - but far better than in New York!

Impressed by the high standard of the development, but parking should be

banned in Aubrey Walk to allow for a smooth traffic flow.

Proposed parking arrangements are totally inadequate - whatever central or local government policy is there should be more parking on-site.

There will be a 50% increase in traffic - the development would still be highly profitable at half the size.

Why not offer on-site parking to Aubrey Walk residents?

Looks lovely, but I'm concerned about the traffic.

A number of visitors to the exhibition made constructive criticisms which tended to focus on the size of the flats:

Windows for living areas too close to Kensington Heights.

Blocks view from Kensington Heights.

There should be more 3-4 bedroom flats to keep the family feel of the area. It's a great improvement, but the flats are too near the road - who wants their

windows 6 feet away from a main road?

Campden Hill flats a bit too bulky, but the Aubrey Walk flats are wonderful.

They are a perfect scale and respect other houses in the road.

My only reservation is the lack of 3-4 bedroom flats.

The block of flats is much too big and high.

Strident opposition to the scheme came from Aubrey Walk residents who made a number of combative comments:

This will ruin one of the most attractive small streets in London.

I deplore the scale of the development - it'll ruin the area, it's not as if it's run down at the moment.

We do not want this invasion and we will see to it you do not succeed.

It will swamp the little church of St George.

I don't want anyone to overlook my house.

We live here and we don't need it ruined by you making as much money as you can by putting too much on site.

You are well aware of the opinions of local residents - this development is an abomination.

These proposals will ruin a very special part of Kensington, this is a CONSERVATION AREA. (sic)

A small number wanted the development to feature more modern design elements:

Apartment block too contextual - neither one thing nor another. Aparunent block is a corporate pastiche. Flats should be of a bolder design.

Some concern was expressed about problems during the construction phase:

Disruption during building work may be horrific.

Access to building works should not be via Aubrey Walk - I have an asthmatic daughter and a baby due in April.

Construction traffic should be routed off Campden Hill Road.

Construction will create too much noise and dust.

Some favourable comments were received about the redevelopment of the tennis club:

I'm relieved that the Tennis Club will have a more certain future. The proposals for the tennis club are excellent.

A Water Tower House resident commented:

Water Tower House residents won't move until they get a better offer.



Essex House 17 Hillsleigh Road London W8 7LE





29 January 1999

Mr M.J. French
Executive Director
Planning & Conservation
RBKC
The Town Hall
Horton Street
London
W8 7NX

Dear Mr French

We are writing to record our opposition to the major development for which Thames Water is seeking approval from the Kensington and Chelsea Council.

We own Essex House, 17 Hillsleigh Road, which is located less than 100 yards from the proposed building site. We bought Essex House in July 1997 for an amount of money representing an investment requiring a substantial portion of our life savings.

We bought Essex House, which we had rented for 4 years previous to purchase, because of the house itself and its location in a quiet neighbourhood of high quality family residences with significant open space nearby. The upper end of Campden Hill Square and the surrounding streets is an island of tranquility.

We believe our investment is now seriously endangered by the Thames Water project, because:

- The planned project is entirely out of character with the surrounding neighbourhood in terms of the proposed density of dwellings in a concentrated area.
- 2. The dwellings are being built in what is today for the most part a large open area, that should be preserved.
- 3. The additional traffic congestion introduced to Hillsleigh Road, Aubrey Walk and Campden Hill Square could not have been carefully studied without a conclusion that it will become intolerable.

- 4. Hillsleigh Road and Aubrey Walk are already being used as a "short cut" by drivers wishing to move to or from Holland Park Avenue and Campden Hill Road without passing through the traffic lights at Campden Hill Road and Notting Hill Gate. Many of these drivers, not being residents of the neighbourhood, drive at high speed up and down Hillsleigh Road, causing danger to all of us who live on that street, especially small children. This will only get worse when more cars are exiting and entering the Thames Water development. There are weekly incidents of road rage when one of these drivers has to stop and wait or back up because of the single lane nature of the existing road.
- 5. There will be intolerable pressure on local parking by new residents in the project and visitors to those residents.
- 6. The construction period will introduce a major long-term nightmare of noise, dirt and congestion as lorries and vans related to the project, crowd the local narrow street, and especially Hillsleigh Road.

We are tax paying citizens of Chelsea & Kensington Borough who invested in good faith in our own property in order to create a reasonably quiet life in an area of London that is central for my work and frequent air travel out of Heathrow. We are amazed that a project that eliminates permanently irreplaceable open space in London; that destroys the character of our neighbourhood; that introduces extraordinary traffic and parking pressures; that will stimulate further ugly cases of road rage in our local street; that deprives residents of the value of their investment in their homes is even being considered as a legitimate development in its present format by the Kensington & Chelsea Council.

We are fully and fundamentally opposed to this high density development, as are all of our neighbours, and if it is approved we will be forced to take steps to consider whatever means are available through legal action to challenge the basic legality of approval of a project so entirely out of character with its immediate surroundings.

Yours sincerely,

David Mulford Jeannie Simmons Mulford



i di 1940 Mahabharana ki ili arrahan**abbaha**rangah milahdbi

6 Aubrey Road LONDON W8 7JJ

16[™] February 1999

M J French Esq Director of Planning & Conservation The Royal Borough of Kensington & Chelsea The Town Hall Hornton Street LONDON W8 7NX

Dear Mr French,

Development of Thames Water Reservoir Aubrey Walk

I am writing to you concerning the plans for the above development which will shortly be considered by the Council.

We formerly lived at 12, Aubrey walk, right opposite the proposed development and now live very close, at the above address. Aubrey Walk was such a delightful location to live in that we wished to remain as close as possible after our household grew into 6 adults and we felt the need for a larger house.

Having lived in these two streets since 1977 we are as familiar as anyone with the build up of traffic congestion and parking problems during this period. We are acutely aware of the disadvantages of living in such a densely populated area and the downside of living in an increasingly fashionable area – the disadvantages are very considerable.

We highly value the local amenity of the Campden Hill Tennis Club and have been members for more than fifteen years. However, a high proportion of members travel there by car and considerably exacerbate the parking problems. It was a severe problem when we lived in Aubrey Walk and the club was then much less busy than it is now.

The deal reached between Thames Water and the Tennis Club provides the same number of courts on HALF THE SURFACE AREA. The underground courts will be indoors and available for use much more than the former outdoor courts. The open air amenity will be HALVED but the congestion in the area will INCREASE. The land thus released will be used in the development, further increasing the congestion in the area, which is already very severe. Activity at St George's Church is already increasing and, at the other end of Aubrey Walk, Aubrey House is bound to attract more traffic when it is reoccupied.

. 2. 18 m. var ser menne en rentre en tradución de la comprese de la comprese de la comprese de la comprese de



on a second distribution and the second seco

M J French Esq 16/02/99

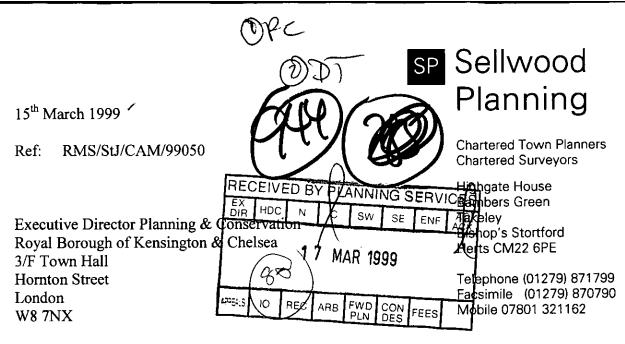
I believe you have received some letters supporting this development but I also believe they have almost all been received from members of the tennis club. Most of these do not live in the immediate vicinity and they are not thinking deeply about the effect of the development on the whole locality. In addition, their support was, I believe, the "price of the deal" with Thames Water. Without it, I believe they were threatened with obliteration. I think you should disregard their opinions.

My final objection is based upon the lack of provision for low cost houses, as is legally required. Building yet more highly expensive houses for employees of overseas banks temporarily resident in London does not lead to the balance in the local community that we would wish to preserve.

Yours sincerely,

Aggela la scerles

Mrs Angela Lascelles



FAO: D Taylor

FAX & POST

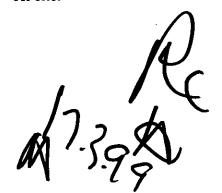
Dear Sir

Application by St James Homes Ltd. Fomer Campden Hill Reservoir Site

Thank you for your letter of the 3rd March 1999 which follows up our discussion regarding affordable housing on the Campden Hill Reservoir site.

Whilst your interim policy on affordable housing does not yet have the weight of an adopted UDP policy, I explained at the meeting that my clients have no particular problem with the suggested sequential approach and its provision. To clarify the points, I can confirm;

- 1. St James will not be seeking to argue that the provision of on site affordable housing will threaten the financial viability of the remainder of the project.
- 2. If there is a Housing Association which can afford to fund the inevitably high cost of service charges arising from on site affordable housing and this remains the preferred approach of your Council, St James will provide on site affordable housing. This would probably be located in the free standing building which fronts on to Aubrey Walk.
- 3. If a suitable Housing Association cannot be found who will bear the high service charges, or your Council ultimately concludes that on site provision is not appropriate, then St James will provide the requisite number of units off site.



4. The provision of an off site commuted sum would be an option which can only be triggered by the Council in the situation where it concludes that in this case it is the most appropriate option.

Since it would be useful to conclude this issue in a S106 agreement as soon as possible, I can see no reason why the sequential approach as outlined above cannot be incorporated in an agreement. Whilst St James are in discussions with Housing Associations at present, the outcome of these discussions will inevitably reflect the financial circumstances of today rather than at the time when the units are to actually be provided. For this reason the use of a sequential approach will ensure that the final decision on the form of provision can reflect the latest available information.

Whilst we will shortly be able to provide you with details of these preliminary discussions, I suggest that we start to prepare a S106 which leaves the choice of type of affordable housing to be determined by your Council in the light of financial information provided by its preferred Housing Association partners.

Perhaps you can advise me whether this is acceptable to you.

Yours faithfully

R M Sellwood

cc. M Simms

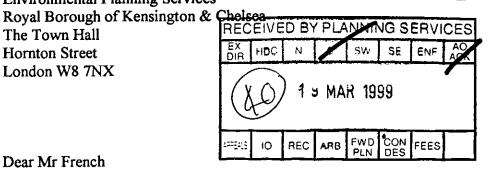
T Blaney

GWAB/ajp/7560

18 March, 1999

M French Esq Executive Director Planning & Conservation **Environmental Planning Services**

Hornton Street London W8 7NX



Broadway Malyan Ltd **Chartered Architects**

Woburn Hill, Addlestone Weybridge Surrey KT15 2QA Telephone: 01932 845599 Fax: 01932 856206

bm.weybridge@dial.pipex.com

Certified to ISO 9001

Dear Mr French

PROPOSED REDEVELOPMENT THAMES WATER RESERVOIR CAMPDEN HILL ROAD Planning Application No. TP/98/2126

Chris Foster, the Chairman of Campden Hill Lawn Tennis Club, has asked us as the architects for the above redevelopment proposals, to write in order to address several points raised in a letter to you by Mrs N F Lykiardopulo of 12 March 1999.

Mrs Lykiardopulo alleges that the computer generated perspectives showing the interior of the proposed indoor courts at Campden Hill which have been used in a recent brochure, are not a true representation of how they would look in reality. I can assure you that this is not our intention. The computer image is based on our technical drawings. We have every intention of providing as much natural light to the courts as possible, something that we will achieve by having skylights above the elevated walkway, as shown in the picture; however the lighting indicated on the illustrations is meant to represent high quality internal sports floodlighting.

As for vegetation, that may or may not be included in the finished building. This is a matter for the club, which is still under discussion. We will be guided by their requirements.

On her remaining point, it is certainly true that Tennis Club members have reacted very positively to the computer images we have produced of what their new club would look like. However, Chris Foster has explained that the vote of members at which support for the redevelopment was given took place last year, well before this much architectural detail was available. The vote of members at that time was 194 in favour with only 12 against.

Contd/....





Other Offices: London, Reading, Southampton Manchester, Johannesburg and Lisbon

Registered № 3540940 Registered Office: Woburn Hill. Addlestone, Weybridge, Surrey KT15 2QA

A list of Directors and Senior Staff is available from any office.



We believe that the development we have designed for Campden Hill is the right one for the site and will enable the Tennis Club to become a prestigious asset for the Kensington area, enjoying some of the best tennis facilities available in London.

Yours sincerely

GERALD W A BINMORE

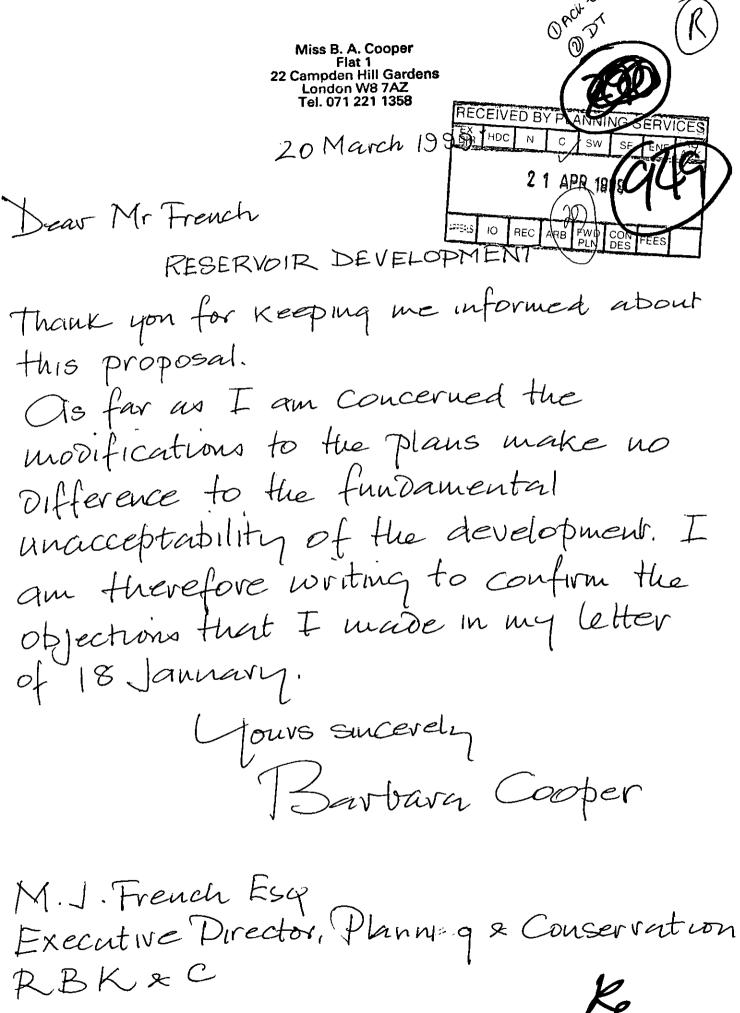
Dip Arch RIBA

Architect

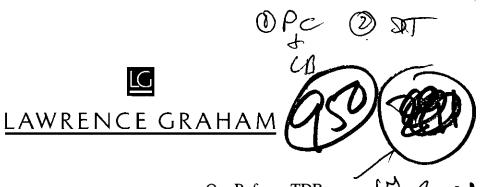
cc: Councillor Mrs Iain Hanham

Chris Foster

Theres Water Site Vullie urgung 20° - 31° John I lave had caxtaints from Ward Collos exandestle home of this -Can we got buch to DETR and and you a ow date in Jet = Keare Jaurfort rendonts will (also object) to the provid duto M/8/1) Objections from local Clus. 727 7684



N 7.99



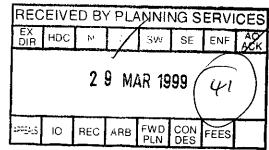
Attn: D Taylor Esq
Area Planning Officer for
Executive Director, Planning & Conservation
The Royal Borough of Kensington and Chelsea
3/F Town Hall
Hornton Street
London W8 7NX
SENT BY FAX AND POST:-

Our Ref: TDB

Your Ref:

DPS/DCC/TP/98/2126

26 March 1999



Dear Mr Taylor

APPLICATION BY ST JAMES HOMES LIMITED FORMER CAMPDEN HILL RESERVOIR SITE

I refer to my letter of 16th March and my telephone conversation with your colleague yesterday, during your absence from the office.

Unfortunately, I do not appear to have received a reply to my letter of 16th March. I would be grateful if you could notify me by return as to the solicitor in the Council's legal department who will be dealing with the Section 106 Agreement.

Yours sincerely

TREVOR BLANEY

Then

Telephoned 29 (3

190 Strand London WC2R 1JN Tel: 0171-379 0000 Fax: 0171-379 6854 Telex: 22673 DX: 39 London Chancery Lane WC2

61 St Mary Axe London EC3A 8JN Tel: 0171-621 1141 Fax: 0171-480 5156 Telex: 887133 DX: 1072 London City CDE

E-mail: info@lawgram.com Internet: http://www.lawgram.com



THE ROYAL BOROUGH OF KENSINGTON AND CHELSE

Councillor David Campion BA(Arch) DipTP FRIBA MBCS
13 Rodney House, 12/13 Pembridge Crescent, London W11 3DY

Internet: DavidCampion@compuserve.com Tel: 0171-229 3931 Fax: 0171 681 2758

Your Ref.

CF

My Ref:

D:\My Documents\Word\RBKC\Planning\Public\CHLTC01.doc

Date:

29/03/99 ~



Mr Chris Foster Chairman The Campden Hill Lawn Tennis Club 9 Aubrey Walk London W8 7JH

Dear Mr Foster

Proposed Redevelopment of The Campden Hill Lawn Tennis Club

Thank you for your letter, dated 19/03/99, together with the brochure about the Club and the proposals for redevelopment.

I have noted the various matters that you cover in your letter and the clarification of certain aspects where you feel that there are rumours about the Club's intentions.

I am sure that you appreciate that, as Chairman, I am unable to comment on the Thames Water application, of which your Club's development froms a part, before the matter comes before the relevant Planning Committee.

Yours sincerely

David Campion

Councillor David Campion

Chairman, Planning and Conservation Committee

Copy: Mr M French - Executive Director, Planning & Conservation



THE CAMPDEN HILL LAWN TENNIS CLUB

9 Aubrey Walk, London W8 7JH

Tel: 0171-727 4050 Fax: 0171-792 0394 Email: tennis@chltc.prestel.co.uk

19 March 1999

Dear Councillor Campion,

PROPOSED REDEVELOPMENT OF THE CAMPDEN HILL TENNIS CLUB

I am sure that you are aware of the current planning application by St James Homes for the redevelopment of the redundant Thames Water reservoir site off Campden Hill Road. The Tennis Club has been located on top of the reservoirs since 1884 and our future is inextricably bound up with the redevelopment of the site. We are, therefore, very keen that the Club's views are put forward to the Council. Enclosed is a brochure showing how St James Homes intends our tennis courts will look if the development is carried out.

We believe that our Club is an invaluable community sporting facility. We have over 1250 members, including 275 juniors, drawn from the surrounding area. For regular tennis players, the costs of membership and the accessibility of our courts compare favourably with council-run tennis facilities elsewhere in the borough. The current proposals would secure our position by providing us with a new 99-year lease. The Club would have 12 new high specification tennis courts on two levels, with the lower 6 being all-weather indoor courts - something few clubs in this country enjoy. In fact, when the new tennis building is completed, the Club will be able to become a centre of tennis excellence with one of the best tennis facilities in London of which the Royal Borough will be justly proud.

I know that many local residents, including some tennis club members, are opposed to the planning application. The Club is sympathetic to the views of local residents - nobody wants a development on their doorstep. We did, however, consult members widely on the redevelopment proposals and all members had an opportunity to express their views. Voting members considered whether we should support the development at a meeting last July, which resulted in an overwhelming majority in favour (by 194 votes to 12). Accordingly, the Club supports the planning application and wants it to succeed.

Finally, for the avoidance of doubt and in order to dispel some of the rumours about the Club's intentions, I should be grateful if you would note that if the development is carried out, it is my Committee's intention that:

- The essential character of the Club will not change. It will remain a Member's 1. Club open to all. It will not become a commercial venture such as the Harbour Club or the Vanderbilt Club.
- 2. Although the new 6 outdoor courts would be of "championship" specification, we would not be running Queen's Club style championships on our courts. We do not do this today. We have no reason to want to do so in the future.
- 3 Our current membership level will not increase.





- 4. Our subscriptions will remain at the level needed to fund the Club each year.

 Membership will continue to be affordable for local tennis players and excellent value.
- 5. Our programmes for local schools will continue and will be enhanced by the new facilities. I should mention that this year we are giving 4 "scholarship" memberships to pupils of Fox and Holland Park Schools who show tennis promise.
- 6. Our floodlit courts will continue to close at 10 pm.
- 7. Parking by members in Aubrey Walk will continue to be forbidden (there is a street map at the entrance to the Club which shows where members can and cannot park). We will always endeavour to be good neighbours.

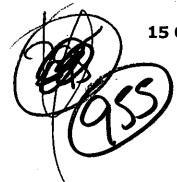
Please feel free to contact the Club Manager, Jason Beever, or me if you have any questions.

Yours sincerely,

Chris Foster

(Chairman)





15 Campden Hill Square Kensington London W8 7JY Tel: 0171 727 4348

Fax: 0171 221 2830

29th March 1999 /

M French Esq.
Executive Director
Planning & Conservation
Royal Borough Kensington & Chelsea
The Town Hall
Hornton Street
London
W8 7NX

Dear Mr French,

RE: THAMES WATER RESERVOIR SITE, CAMPDEN HILL ROAD/AUBREY WALK

I understand that St. James Homes Ltd have now submitted a revised planning application for the above site. Their revisions appear to be relatively minor amendments to their previous plans and seem to have ignored the main points of objection which have been so vociferously raised by local residents. Please treat this letter therefore, as a further objection to my letter of 14th December 1998.

I welcome the fact that the revised application incorporates some reduction in scale to the block of flats fronting Campden Hill Road and Aubrey Walk and it would appear that the revisions have also removed a further house in the Western terrace of the square, increasing the distance between the terrace and Aubrey Walk. It would appear however, that by making these minor alterations and failing to address the main points of objection, St. James are determined to try to bulldoze their proposals through the planning process by means of a war of attrition. I very much hope that the Planning Office and the Committee will resist this approach and that the revised plans will be rejected since they remain in such direct conflict with the backbone of the UDP.

As regards the existing tennis courts on top of the reservoirs, this part of the site is clearly identified for use to provide public open space in the Council's Open Space Survey of 1992. Indeed the site is listed as fourteenth out of a total of thirty eight public open spaces which need to be protected and it is recognised that most of the Borough's land area is sadly deficient of open spaces. It is no answer in this context





sympathetic design was proposed. The Water Tower building itself should, I believe, be retained as should the existing tennis courts and reservoirs.

For the above reasons, amongst others, the revised application should be firmly refused. It should, in my view, be made plain to any applicant that any further application for the site will also be refused if it fails to respect the listed open space of the existing tennis courts and the contribution that the open character and appearance of Aubrey Walk, it's trees and vegetation make to the conservation area.

It seems to me that Thames Water and St. James Homes (possibly quite justifiably in the planning process) have unlimited access to the Planning Department and to meetings with Planning Officers. I am concerned however, that these powerful organisations are bringing undue pressure to bear in their attempt to bend the planning criteria that apply to this site. In view of this, and in order to uphold the democratic process, I should be grateful if you would allow a limited number of local objectors, including myself, to have a meeting with you prior to you writing your Planning Report on the latest revised planning application.

I look forward to hearing from you.

Yours sincerely,

HAMISH WATSON

cc: Councillor Mrs Iain Hanham CBE
The Leader of the Council
The Town Hall
Hornton Street
W8 7WT

Anthony Land, Chairman Campden Hill Residents Association George Thomas, Chairman Campden Hill Square Gardens Committee Henry Manisty, Aubrey Walk Action Group

to provide further tennis courts under ground whilst destroying open space above ground. The open space provides an important contribution to the character and appearance of the conservation area as a result of it's generally open character and it's trees and vegetation. It is because the site is located within a primary residential area that it provides such a significant contribution to the levels of amenity currently enjoyed, not only by those who live in the area, but those who visit it. I believe that the latest Government guide lines, PPG3, again emphasise the importance of protecting such open spaces. I understand that St. James are arguing that the reservoirs are redundant and need to be demolished and therefore this is a "brownfield site". This is, I believe, a spurious argument since the site is listed as an important open space and the reservoirs themselves make a positive contribution to the character and appearance of the conservation area. Even from a limited development of the remainder of the site, Thames Water and St. James (both very profitable concerns in their own right) will make further substantial profits which would enable them to maintain the reservoirs in perpetuity. The open space of the tennis courts must be retained at all costs. RBK&C which, I believe, is the most densely populated area in the country with the least amount of open space, can simply not afford to lose one of it's listed open spaces.

The reaction of every person I talk to from outside the area, who has reasonable knowledge of the area, when told of the proposals and the access onto Aubrey Walk is "Don't be ridiculous!". In planning terms such exclamations may not carry much weight and it is therefore up to objectors and hopefully the planning office to substantiate and give planning weight to these natural gut-reactions. I have been puzzled for sometime as to how the developers could possibly argue that there would be no significant increase in traffic generation, parking problems, danger to safety and congestion from the proposed development and from the proposed new tennis club which would lead to far greater year round use. I now understand that in order to demonstrate that there would be an insignificant increase in traffic and parking problems the applicants have included in their survey of existing traffic levels an "allowance" for the re-introduction of industrial and office use on the site. This is preposterous. There is no existing general open planning use for the site and the site I believe was originally purchased by the Metropolitan Water Board for operational use with regard to water supply. It is apparent from historical records that certainly some (if not all) of the existing offices are restricted to use by the Metropolitan Water Board (including it's successors) and the depot itself in planning terms, is almost certainly only allowed as part of the maintenance and supply of water. There is no question that a private developer could have obtained planning permission on this site for an industrial unit and the existing use does not fit into any of the 'normal' use classes. It is only allowed because of it's importance as a water utility. Revised traffic surveys need to be carried out, NOT DURING THE SCHOOL HOLIDAYS (either state or private) and these figures should then not be doctored with an allowance for "re-introduction of industrial and office use".

The redevelopment of Water Tower House itself would, I believe, be acceptable providing it was designed sympathetically, carefully respecting St. George's Church, the listed buildings along Aubrey Walk, the bank of vegetation along Aubrey Walk and the general ambience of this area. It might be hard to resist further residential housing behind Water Tower House on that corner of the site, providing again that a



Campden Hill Reservoirs Planning Developments



- (1) Revised Plans St James has submitted a revised planning application this week incorporating some "improvements" to the original plans. The revisions are stylistic modifications and some reduction in scale to the blocks of flats fronting Campden Hill Road and Aubrey Walk, the loss of one house in the south terrace of the square (increasing the distance between the square and Kensington Heights), the loss of a further house in the western terrace of the square (increasing the distance between the terrace and Aubrey Walk) I understand there will now be a three week period for residents to comment on these revised proposals. No doubt to maximise the difficulties of residents writing in by the due date, the developers have chosen to submit the revised plans over the Easter period. The original plans were filed in the run up to Christmas. It will be necessary to remobilise letters from residents opposing the revised plans as the changes appear to be cosmetic.
- (2) English Heritage. David Stabb reported that on Wednesday this week there was a joint meeting with the developers and their architect and Derek Taylor, the RBKC planning official on the case. The purpose was to discuss the letter sent by Mr Stabb to RBKC commenting quite harshly on the first proposals. His comments appear to have motivated some of the developers' stylistic changes to the original plans, particularly to the frontages of the apartment blocks. He continues to be unhappy about the relationship between the proposed development and its immediate surroundings but said that his powers were limited to considering its impact on the listed buildings and reported he was criticised by St James Homes at the meeting for "exceeding his brief" by commenting more generally on the proposals. He has been asked by RBKC to write a further letter probably late this coming week commenting on the revised proposals. He said he would be pleased to receive letters from residents commenting on the new proposals which would assist him in writing that second letter (but we will have to be quick). He reported that Taylor told him that 400 letters have now been received from residents opposing the development.
- (3) Certificate of immunity from listing. This week the Department of Environment (DETR) has agreed to the request made to it on behalf of St James to grant immunity from listing for 5 years for the reservoir and pumping station. The DETR letter confirms that this will also prevent the local authority placing its own preservation order on the buildings. However, the effect of the letter is limited since the structures are located within a conservation area where the provisions relating to the need to obtain approval for demolition of buildings, even ones not listed but which are an attractive feature of the locality, still apply and where the local authority has to take account of a series of factors before granting permission for demolition. Nevertheless, the developers and possibly council planning officials may seek to argue that this shows that the buildings are not worth preserving.
- (4) New draft planning guidance on housing policies issued by the DETR. This week the DETR has issued a much publicised draft statement on housing encouraging greater building in towns and cities while taking the strain off the countryside. If confirmed, the guidelines (PPG3) would place a responsibility on local authorities to place a priority on the development of urban land and especially to maximise the re-use of previously developed urban land. LA's are encouraged to increase housing densities. The Developers will no doubt try to argue that the draft PPG 3 supports their case. Fortunately, it does not. PPG 3 balances the need for higher densities and the reuse of urban land by the need for "creating a more attractive residential environment". In S 37, the DETR records " it wishes to see....the retention of existing and the provision of

new open space, the planting of trees and grassed areas, and recreational provision within urban areas". Again, in S. 52 "Open spaces, particularly public open spaces and playing fields, are essential amenities within urban areas....only where there is a deficiency in the community's longer-term needs for accessible playing fields or open space should such areas be developed for housing. Local authorities should have clear policies for the protection of open spaces and playing fields. Proposals for change of use to housing should only be allowed where there is clear evidence that adequate local provision of open space and playing fields should remain".

To recall, the reservoirs surface is designated public open space in the RBKS Open Space Survey. The strong statements on preserving open space in PPG3, if the draft is confirmed, will therefore have to be complied with before housing could be built over it. Furthermore, RBKC already has the lowest ratio of open space of anyLondon borough. (I believe, but I am not sure, that "playing fields" are only counted as such if above ground.)

In relation to David Stabb's observation that the proposed development does not relate to its surroundings PPG 3 comments as follows: "New development cannot be viewed in isolation from the landscape and its surroundings. In considering the design and layout of new housing, local planning authorities should recognise this context having regard to any immediate neighbouring buildings, streets and spaces, local and regional building traditions and materials, and the townscape and landscape into which the development is to be set."

Furthermore, PPG 3 several times referes to the need to **convert** redundant buildings. This again emphasises that insufficient thought may have been given to converting the pumping station. (As we know, the local planning authority covering Highgate has recently required conversion of a similar and unlisted Victorian pumping station.)

PPG 3 is also helpful in its definition of "previously developed land" where local authorities are under an obligation to maximise housing development.. It writes "Also excluded is land that was previously developed but where the remains of any structure or activity have blended into the landscape in the process of time....or has subsequently been put to an amenity use and cannot be regarded as requiring development".

Finally, PPPG 3 re-emphasises the heightened requirement for affordable housing to be included in developments.

In conclusion, PPG3 is a strong defender of open space, particularly public open space, and sporting facilities and expressly excludes from the definition of "previously developed land" (i.e. brownfield sites) a site such as te reservoirs space which has supremely "blended into the landscape in the process of time" (over 100 years) and has been "put to an amenity use".

If the reservoirs site had not been designated as open space and had not been put to amenity use, it is inevitable that PPG3 would have made it easier to be developed. Fortunately, that is not the case.

HM