

buildings, and one block of flats. However, given that this is anyway a residential area, and therefore, a compatible land use. Although the density of development is very high, it is not considered that the development would be likely to result in noise levels that would materially reduce the levels of amenity presently enjoyed in the locality.

4.118 Levels of noise and activity associated with road traffic have been assessed separately above.

4.119 Policy CD35 of the Unitary Development Plan is:

“TO ENSURE THAT RESIDENTIAL DEVELOPMENTS INCLUDE ADEQUATE PROTECTION OF THE INTERNAL ENVIRONMENT FROM THE EFFECTS OF NOISE”

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4.120 This is a residential area without any major noise sources. The peace and quiet of the area have been stressed earlier in this report, and by the majority of local residents who have written in on the proposals. An Environmental Noise Survey or PPG24 “Planning & Noise” Assessment are not considered to be appropriate in this case. It is considered that there is no objection to the proposals in terms of Policy CD35

4.121 It is not considered that a combination of residential and sports/open space uses on this site presents any concerns in terms of sustainability.

4.122 The new Town and Country Planning (Environmental Impact assessment) Regulations came into force on 14th March 1999. They have revoked and amended the earlier 1988 Regulations. The regulations provide *exclusive* thresholds under which certain developments will not require EIA and *indicative* thresholds above which EIA is “likely to be need” for certain schemes. There is a grey area between these two thresholds where EIA *may* be required.

4.123 The “exclusive” threshold for “urban development projects”, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas is 0.5 ha. The “indicative” threshold for when EIA is “more likely to be required” is 0.5 ha or more. In theory, therefore, the Council could require an EIA for a proposed development if it is likely to have significant environmental effects, if the size is greater than 0.5 ha.

4.124 In the case of this application, extensive study has been carried out into traffic generation, and no noise or pollution generating uses are proposed for the site. It may be that the proposals would have a significant visual impact upon the area, as argued elsewhere in this report, but there the proposals are not considered to present any significant environmental implications and an EIA is not considered to be necessary here.

Floodlighting

4.125 At present, the two double court areas are lit by five 8m lighting columns down each side of the two blocks of courts. There are no Conditions or other local authority controls, governing their use or light emission.

4.126 It is proposed that four of the proposed courts would be floodlit, using 6.7m columns mounting high performance asymmetric floodlights. It is anticipated that, in addition to having shorter columns, the proposed lights will afford greater control of lightspill and glare. Furthermore, there is now the opportunity to impose Conditions to restrict the hours of use of the lights. It is considered that Conditions to control the light spread, and

restrict the hours of operation, would enable greater control over the floodlighting than exists at present and result in residential amenity being satisfactorily safeguarded.

- 4.127 It is concluded that, subject to such controls, the proposal would not be likely to result in any greater light pollution from the tennis club illumination than at present, and probably an improvement.

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Trees and Landscaping

- 4.128 There are a number of existing mature and semi-mature trees around the boundary of the site, with many of these on the North (Aubrey Walk) and South sides of the site providing a highly important contribution to the visual amenity of this part of the Conservation Area. The applicants have provided a full survey of the trees on the site, and lengthy discussions have taken place between the applicant's consultants and the Council's Arboriculturist as to the likely impact upon these and nearby trees.
- 4.129 The most important trees are considered to be a mature ash on Aubrey Walk immediately to the East of the tennis club, a group of three sycamores immediately to the West of the existing main site access, three Turkish hazel trees also on Aubrey Walk, six ginkgo trees and a birch tree on Campden Hill Road. The southern boundary to the site contains sixteen large sycamore trees, and the western boundary (to Aubrey House) a variety of trees and shrubs including sycamore, oak, ash, and hawthorn.
- 4.130 Impact upon Aubrey Walk - the ash, sycamore, and hazel trees of Aubrey Walk are all to be retained, and protected throughout construction. The Council's Arboriculturist is satisfied that the proposed protection measures will safeguard these trees. As the three hazel trees are outside the site boundary, a planning Obligation under S.106 would be required to safeguard them.
- 4.131 A block of self-seeded vegetation does exist to the North of the pump house; this does not comprise items any individual value, but collectively helps screen views in to the site. This area would be lost in the proposed development, but new planting is proposed along Aubrey Walk to compensate for its loss.
- 4.132 Impact upon Campden Hill Road - The six ginkgos and one birch along the boundary with Campden Hill Road are to be retained. Protecting them on-site would be difficult during works, and it is proposed that these are to be removed from site and replaced during landscaping works.
- 4.133 A large Tree of Heaven adjacent to Water Tower House would also be lost, but its proximity to Water Tower House is such that adequate protection would be most unlikely to be achieved during the demolition of the building. Consent for the removal of this tree was granted on 3rd March 1999.
- 4.134 Along the eastern boundary adjacent to Kensington Heights, there is a strip of existing trees and shrubs on a shallow embankment. This strip of land is not in the same ownership as the application site and all these trees are retained. The tree protection methods are considered to be satisfactory.
- 4.135 Southern boundary - The eastern part of the southern boundary is where gardens to the southern terrace of houses are proposed, and the development here would necessitate the loss of six sycamore trees. However, the Council's Arboriculturist concludes that their loss will not

be significant in visual amenity terms given the replacement landscaping. Concern is raised at the possible impact of excavation to form the new garden levels in this area, which should be set aside by Condition for further clarification.

4.136 Western boundary - The trees along the western boundary embankment between the tennis courts and Aubrey House are all retained, and protected.

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4.137 The landscaping proposals have been designed to provide a green boundary to the development, and a green centre to the housing in the form of the "square". Extensive tree and shrub planting is proposed for the site boundaries in addition to the trees anyway retained, with the aim of creating a "green perimeter" to the site as well as a "green centre". This is considered to be satisfactory, and although the appearance of the site may change the proposed planting scheme, combined with the retained trees, is considered to ensure that the site would still provide an important "soft" or "green" element within the Conservation Area.

4.138 As some of the planted and grass areas would be on topsoil above the basement car park, an irrigation system is proposed to ensure adequate water for the planting. Where this is private garden space to houses, irrigation systems will be provided individually to each property. Generally, planted areas would be 1500mm deep, although some shrub areas immediately around the terraced houses would be shallower at between 500 to 1000mm. These depths are considered to be satisfactory.

4.139 The Arboriculturist recommends that the submitted Tree Protection Method Statement (revision C9/3/99) is in accordance with BS:5837, and it should be imposed as a Condition on any planning permission.

Privacy

4.140 The Unitary Development Plan acknowledges that the Borough has the highest residential density in Great Britain, with privacy consequently being a highly valued amenity. It is also acknowledged in the Plan that some loss of privacy as a result of development may be unavoidable. The Plan advises that a distance of about 18 metres between habitable room windows reduces reduction of privacy to a degree acceptable to most people. Policy CD30 is:

"TO REQUIRE DEVELOPMENT TO BE DESIGNED TO ENSURE SUFFICIENT VISUAL PRIVACY OF RESIDENTS AND THE WORKING POPULATION"

4.141 The proposed site layout would result in distances of 20m between the eastern terrace of the "square" and the nearest face of Kensington Heights, although at this point only the blank flank wall of the southern terrace would face Kensington Heights, with no habitable rooms facing each other. The nearest point at which habitable rooms face each other along the boundary between the eastern terrace and Kensington Heights would be 22.5m, pulling further apart after that, also divided by new tree planting. There would be a distance of 12.5m between the southern flank of the Campden Hill Road block and the nearest part of the North side of Kensington Heights, although the North flank of Kensington Heights does contain windows to habitable rooms, and balconies. Clearly, an amount of privacy will be lost here. However, given that the principle of redevelopment on the Water Tower House site is accepted, and encouraged in Council documents, it is

considered that the amount of overlooking that would occur would not be of enough significance so as to justify a refusal of planning permission on this ground.

- 4.142 There would be a 16m distance at the closest point between the Aubrey Walk block and the front elevations of nos. 2 to 6 Aubrey Walk, although other parts of the elevation would be at 19m. There would be 12m between the closest part of the western terrace and nos. 18 and 20 Aubrey Walk. In each of these situations, there would be habitable room windows facing each other. Any loss of privacy in these instances would, however, be mitigated to some extent by planting.
- 4.143 Although some loss of privacy must result from the proposed development, as where there is an open aspect at present that would be replaced by buildings containing windows, it is considered that this impact would be of a small enough degree to comply with Policy CD30. This conclusion is particularly the case when the proposed trees for the site boundaries, notably those with Kensington Heights, are taken into account. It is not considered that there would be any degree of privacy loss to nearby property that would justify a refusal of planning permission.

Daylight

- 4.144 Turning to the effect of height and bulk upon daylighting to surrounding sites, new development in these situations should satisfy the requirements of the Council's own Policies, which in turn are based upon the advice presented in the document "Site Layout Planning for Sunlight and Daylight: a Guide to Good Practice", published by the Building Research Establishment in 1991. This is commonly referred to as the "BRE Report".
- 4.145 The applicants have submitted a study based upon the BRE guidance, setting out the likely impact of their proposals upon surrounding property. This Council has commissioned its own consultant to assess the proposals, again based on the BRE guidance, and examine the study submitted by the applicants. "The Guide to Good Practice" recommends that "daylighting of an existing building may be adversely affected" if the vertical sky component at the centre point of a main window is less than 27% and less than 0.8 times (80%) its former value. The Guide states that living rooms, dining rooms and kitchens are important and that, although they are less important, bedrooms should also be analysed.
- 4.146 Policies CD28 and CD29 set out the Council's position on the protection of natural light. Policy CD28 is:

"NORMALLY TO RESIST DEVELOPMENT WHICH SIGNIFICANTLY REDUCES SUNLIGHT OR DAYLIGHT ENJOYED BY EXISTING ADJOINING BUILDINGS AND AMENITY SPACES"

- 4.147 Policy CD29 is:

"NORMALLY TO REQUIRE DEVELOPMENT TO BE DESIGNED TO ENSURE GOOD LIGHT CONDITIONS FOR ITS BUILDINGS AND SPACES"

Aubrey Walk

- 4.148 The effect upon, in particular, nos. 2-6, 8-16, 18, 20, 22, and 24 Aubrey Walk has been assessed. It is concluded that there would be a small reduction in the amount of daylight received by the South facing rooms of properties in Aubrey Walk. The vast majority of windows currently enjoy, and would continue to enjoy, a vertical sky component (VSC) in excess of 27%. Three windows would drop below 27%, but in each of these instances they would retain more than 80% of their former value. The worst case is one ground floor window to no. 24 Aubrey Walk, where the VSC would drop marginally below 27% to 26.49%, and 86.91% of its former value. This is not considered to be of enough significance to present a case for objection in planning terms.

Kensington Heights

- 4.149 As originally submitted, the proposed development would have resulted in the likely loss of sunlight and daylight to a number of properties around the site boundaries, notably to the lower floors of Kensington Heights at the south-eastern corner of the site. The proposals have since been amended, and the deletion of the eastern-most house from the southern side of the "square" has improved the position in relation to the nearest part of Kensington Heights.
- 4.150 Notwithstanding the revisions, Kensington Heights would still be affected in terms of daylight, mainly at first floor level on its northern side, facing the proposed Campden Hill block. It has been calculated that ten windows in this part of Kensington Heights would have their vertical sky component reduced to less than 80% of their former value. Two West facing windows would also receive such a loss.
- 4.151 Two of these windows are to kitchens, the remainder to living rooms or bedrooms. The worst affected room would be the eastmost first floor room on the North elevation, a bedroom, which would receive 58% of its existing daylight. The second most affected is a living/bedroom at first floor level facing the Campden Hill block, which would receive 62.41% of its existing daylight as a result of the proposed development. In both of these cases, the loss of daylight would clearly be material. In the remainder of cases, it is much more marginal and not considered to be of significance.
- 4.152 In one of the worst two cases an existing balcony over-sailing the window to the room artificially reduces the amount of daylight received by the room at present.
- 4.153 Consideration of this material loss of daylight must be taken in the knowledge that the Council's own approved document, the Conservation Area Proposals Statement, encourages the redevelopment of the existing Water Tower House. Any replacement building will take some daylight from Kensington Heights; the extent would depend upon its design, but some impact is considered to be inevitable. To amend the design of the presently proposed Campden Hill block to take account of the objections to its overall massing would probably help reduce the daylight impact upon these rooms, although to amend the design to remove the impact altogether might well compromise the replacement building to the extent that its townscape contribution might also be impaired.
- 4.154 It is recommended that any future proposal for a replacement building for Water Tower House should address this problem and have, at the very least, a reduced impact upon these North facing rooms than the present proposal.

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- Aubrey House
- 4.155 There would be no impact in either sun or day lighting terms to the building or gardens of Aubrey House, to the West of the site. Thorpe Lodge and the adjacent school buildings to the South would be similarly unaffected.
- 4.156 Applying Policy CD29, it is considered that the likely light levels within the development are sufficient to provide a satisfactory standard of natural lighting to the dwellings.

Sunlight

- 4.157 The Guide advises that the effect of a development on sunlight availability to adjoining buildings should be considered if part of a development falls within 90 degrees of due South of a "main window" of an adjoining building. If the available sunlight hours are both less than the amount given and less than 0.8 times their former value, either over the year or during the winter months, then such a loss would normally be viewed as material.

2-24 Aubrey Walk

- 4.158 The studies into sunlight conclude that there would not be any material loss of sunlight to the properties along Aubrey Walk. In a few cases, a gain in winter sunshine would actually be achieved. In every case these properties would retain the recommended level of sunlight and, therefore, the criteria set by the Guide are met in respect of these properties.

Kensington Heights

- 4.159 There would be no material loss of sunlight to Kensington Heights windows. Some slight reduction in sunlight hours would be noticed from the first floor flats in the West elevation of the block, estimated as a reduction from 19% of annual receivable hours to 17% in the summer months. It is not considered that this effect upon existing hours of sunlight is of enough significance to present grounds for a planning objection.

St. George's Church

- 4.160 The studies have shown that there would be no reduction to the ground floor entrance area to St. George's church.

5.0 STATUTORY AND NON-STATUTORY CONSULTATION

- 5.1 English Heritage have commented in relation to the application for Conservation Area Consent for the demolition of the reservoirs and Water Tower House, in relation to the impact upon the setting of the nearby Listed buildings, and in relation to the form and design of the proposed development and its impact upon the character and appearance of the Conservation Area.
- 5.2 English Heritage raised a number of concerns relating to the proposals as originally submitted, describing the then proposed design as a "loose fitting assemblage of architecture that fails almost entirely to address the urban context in which it is set".
- 5.3 English Heritage concluded that the original submission required amendments to the West block, the central plaza should address Aubrey Walk better, the building line of the Aubrey Walk flats need to be improved, the Water Tower House building needed re-designing, and the relationship of the South terrace to Thorpe Lodge needed re-considering. The subsequent revisions have dealt with all of these points, with the exception of the last one.
- 5.4 English Heritage remain concerned about the impact of the proposal upon the setting of the surrounding Listed buildings, in particular the relationship between the southern terrace and

Thorpe Lodge to the South of the site. They consider that the difference in height of over 10m between the two buildings (which are at a distance of less than 25m at their closest) is an unreasonable exploitation of the change on ground level, and is to the detriment of the setting of Thorpe Lodge.

- 5.5 English Heritage also criticise the frontage treatment suggest the greater use of front garden boundary walls and the omission of vehicle entrance gates altogether, with the use of return walls from the boundary to stitch together the buildings, entrances, and site enclosure.
- 5.6 English Heritage note that considerable improvement has been made to the scheme in revisions, but they request that consideration be given to a further simplification of the plan and elevational treatment of the Aubrey Walk flats.
- 5.7 Sport England (formerly the English Sports Council) were notified of the proposals. They have responded, initially, by drawing the Council's attention to their Planning Policy Statement, which sets out the policies that they will follow in relation to development proposals.
- 5.8 Their primary Policy is "P1", which is:

"The English Sports Council will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or part of a playing field, or land last used as a playing field in an adopted or draft deposit local plan, unless, in the judgement of the English Sports Council, one of the specific circumstances applies"

- 5.9 Five "specific circumstances" are set out. The first refers to an assessment of future needs concluding there would be a surplus of such provision, the second is where the proposed development is purely ancillary to the playing field, the third where the land in question is incapable of forming a playing pitch. The fourth and fifth grounds for exception to Policy P1 are applicable to the proposed development, and are as follows:

where "the playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development"

and "the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of the sport so as to outweigh the detriment caused by the loss of the playing field or playing fields"

- 5.10 Both of these grounds for exception are considered to be applicable to the proposed tennis court development, which is to replace the existing courts with much improved facilities.
- 5.11 It is noted that tennis courts are not specifically included within the definitions of "playing field" and "playing pitch".
- 5.12 Sport England do not, therefore, raise any objection to the proposals.

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6.0 PUBLIC CONSULTATION

- 6.1 Five hundred and fifteen letters of notification have been sent to neighbouring properties in Aubrey Walk, Aubrey Road, Campden Hill Road, including the residential block of Kensington Heights.
- 6.2 Three hundred and eighty four objections have been received relating to the proposals as originally submitted. Eighty five further objections have been received following the revision of the proposals. Objections are still being received, and this number will be updated verbally at Committee.
- 6.3 In support of the objections, opinion has been submitted from Counsel.
- 6.4 Objections have been received from Councillor Freeman, Councillor Buckmaster, and Councillor Levitt, who object in particular to the principle of loss of open space, the scale of the proposed development, failure to provide social housing, and likely traffic generation. Councillor Buckmaster takes exception to the use of the phrase "brownfield site" to justify the application, and comments that such a description would not hint at the true context of the site, "an attractive leisure area on top of a reservoir, which for decades has provided a much appreciated open space in this densely populated part of London" Councillor Buckmaster concludes that the proposal "flies in the face of so many of the Borough's policies, with no countervailing national interest to consider. In this case the advantages would all go to the developers and the disadvantages to the Community"
- 6.5 Councillor Levitt observes that some degree of development would be inevitable, and that the redevelopment of Water Tower House would be welcome. He objects, primarily, on the ground that the proposal would be overdevelopment of the site as a whole, especially with the proposed vehicular access to Aubrey Walk. He also objects to the likely impairment of the setting of Aubrey House and the row of houses and church along Aubrey Walk, and the reduction of open space on the site which would be contrary to UDP policy.
- 6.6 Objections have been received from the Kensington Society, the Campden Hill Residents' Association, and the Kensington Court Residents' Association.
- 6.7 The Campden Hill Residents' Association have objected on a number of grounds, notably the intensity of development in a Conservation Area, the loss of open space, impact upon Aubrey Walk, overdevelopment and scale and bulk of the proposed houses and flats, aggravation of the present difficulties in Aubrey Walk with traffic and parking, the possibility of a 24hr club becoming reality, the conflict with the objective of improving air quality, and the fact that the proposal would provide locked gates can only be regarded as a mockery of the public open space envisaged in the UDP.
- 6.8 The Kensington Society object to the intensity of the development in a Conservation Area, the fact that UDP Policies are unsatisfied, the likely traffic problems and the cumulative effect of a redevelopment of this site together with the King's College site on Campden Hill Road.

- 6.9 The Kensington Court Residents' Association stress the need to retain open spaces, especially green spaces, and point out that although not in the Association's local area the problems being faced by Campden Hill Residents today will be someone else's case tomorrow, if open space is allowed to be threatened in this way.
- 6.10 Objections submitted on behalf of residents of nos. 2-16 Aubrey Walk cover the following grounds: demolition being a commercial expedient, not a legal requirement; over-development resulting in the destruction of an area of Kensington enjoying rustic qualities and harming the character and appearance of the Conservation Area, and absence of policy support for the proposals.
- 6.11 "Guided Walks in London" have objected on the grounds that a development on the scale proposed, no matter how well designed, must have an adverse impact upon the "village" feel of the area and "destroy the unique character of this tranquil backwater".
- 6.12 The large number of individual objections include some or all of the concerns raised by the Ward Councillors and the Associations mentioned above. The most common grounds of objection are that the proposed development is (a) too great in scale and density for this site, (b) would result in the loss of valuable open space on the site, (c) would cause a significant increase in traffic levels, and parking pressure, in the area, (d) would reduce daylight and sunlight to neighbouring properties, (e) overdevelopment, (f) the effect of these would be a marked and harmful transformation of a pleasant, attractive, backwater into a densely developed, and busy, local environment, (g) loss of trees, and (h) construction noise. Other objections relate to (i) an example of developers seeking to maximise profit at the cost of harming the character, and amenity, of the locality, (j) the removal of buildings of historic interest, and (k) impact upon neighbouring property from floodlighting and noise.
- 6.13 Many of the grounds of objection echo concerns already set out in this report, and these concerns are strongly supported by relevant Council policies. Many of these concerns are reflected in the recommended reasons for refusal. In terms of the other concerns raised, the following comments are relevant.
- 6.14 (c) Traffic levels and parking pressure - Many objectors have stressed their concern that traffic levels in surrounding streets, Aubrey Walk in particular, would become intolerable if the proposed development were to go ahead. It is pointed out that the existing site attracts relatively little traffic, and yet it still puts further pressure upon parking spaces locally.
- 6.15 The studies carried out into likely traffic generation all reach the same conclusion; that the proposed development would not generate any significant traffic levels within Aubrey Walk or other local streets. As discussed in the main text of the report, it is considered that the change in the pattern of traffic activity may have an amenity impact, but in terms of overall vehicular numbers the redevelopment for tennis club and housing does not present grounds for a planning objection.
- 6.16 (g) loss of trees - As described in the main text of the report, although some trees would be lost it is considered that the fact that all the most important trees on the site would be protected and retained, and the fact that significant replacement planting is on offer, together lead to the conclusion that the loss of individual trees would not be a sustainable ground for objection (It should be noted that this comment relates to individual trees, not the overall planting of the embankments of the site)
- 6.17 (h) construction noise/disturbance - this is a matter controlled under the Control of Pollution Act, and is not a material planning consideration.

6.18 (i) Profit motive - This is not a relevant planning consideration

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6.19 (j) Removal of buildings of historic interest - The reservoir buildings are of importance because they provide open space, but they are not of any intrinsic architectural or historic importance. They benefit from a Certificate of Immunity from Listing.

6.20 (k) Floodlighting and noise - The same number of floodlit courts is proposed as existing (four). The difference is that whereas the existing floodlighting is not subject to controls imposed by planning Conditions, if the proposed development were granted then controls could be attached to limit the hours of operation, ensure no spread of light, and so on. One objection has been submitted on behalf of the owners of Aubrey House, setting out concerns that the proposed location of four floodlit tennis courts close to Aubrey House could result in disturbance to Aubrey House by virtue of light spillage, and increased evening noise.

6.21 It is not considered that this concern would provide a reason for refusal. There are four, floodlit, courts existing, without any control whatsoever regarding light spillage, or hours of operation. In the event of planning permission being granted, the opportunity would then exist to impose controls, by Condition, upon the light fittings and their hours of operation, that would provide much greater control than existing, and much greater protection for the amenity of adjacent property.

Letters of support

6.22 62 letters of support have been received. All of these letters, with two exceptions, have been sent by members of the Campden Hill Lawn Tennis Club. The two exceptions are residents of Campden Hill Gardens and Ledbury Mews West. Unfortunately, the supporters who have written in on the tennis club's headed notepaper have not revealed whether they are residents of nearby streets who might themselves be affected by the proposals, or whether they live further afield. The standard wording of the letters of support hold the simple statement: "I am a Member of the Campden Hill Lawn Tennis Club and would like to register my support for the above planning application made on behalf of Thames Water, which includes housing and twelve [now 13] tennis courts"

6.23 A letter of support has been submitted by the Chairman of the Lawn Tennis Club. He confirms that it is the intention of the Club that the existing style and organisation of the club should be retained as far as possible. He explains that they hope to attract more interest from Holland Park School and to arrange direct access on the South side from the school. He explains that the club building will look just the same from the outside, and the open courts would look the same. He views the new sports facility, which would be enabled financially by the housing development to the East, to be an asset for the community. He confirms that the Club already restrict parking in Aubrey Walk, and that there is a street map at the entrance to the club which shows where members can and cannot park.

Revised Proposals

6.24 The revisions submitted to the original application, TP/98/2126, are the basis for the later application PP/99/0733; these proposals are now identical.

6.25 Following the receipt of revisions to the proposals, which re-worked the Campden Hill Road block, reworked the central open space, adjusted the building lines, and removed one house, a further notification was sent to all existing objectors.

6.26 Eighty-five further objections have been received specifically commenting upon the revisions. A number of these comment that some improvement has been made, however, all of these



further objections conclude that the revisions do not go far enough and fail to address the fundamental objection to the whole scheme, which is that the site should remain open space.

- 6.27 Councillor Buckmaster summarises the revised scheme as one which "in no way alters my previous objections, as none of the unacceptable features have been properly addressed."
- 6.28 Councillor Buckmaster re-stresses the relevance of the draft PPG3 (annex B), where it excludes from its definition of "previously developed land" sites that have blended into the local landscape over time (quoted in para. 4.26 of this report). He stresses the need to retain the continuous line of open space that runs from the reservoir site through Aubrey House garden, and on to Holland Park.
- 6.29 Councillor Buckmaster points out that the Council has adopted a sequential procedure to be applied for affordable housing on developments of this size. But that the applicant's proposals for a "cascade approach" completely fail to satisfy the Council's recently agreed policy.
- 6.30 Councillor Buckmaster comments that the submitted Traffic Impact Analysis is flawed in its approach, and was taken at a time when , during the school holidays, traffic problems are at a minimum.
- 6.31 Councillor Buckmaster also raises the matter of Environmental Assessment, and is concerned that any decision on "what is one of the largest development applications" in this Borough could give grounds for subsequent review if taken without an environmental assessment.
- 6.32 Councillor Freeman notes than none of the fundamental problems with the original proposals have been addressed in the revisions.
- 6.33 He re-affirms his grounds of objection as being:
 - (1) The density of the scheme
 - (2) The height of the buildings
 - (3) The generation of additional traffic
 - (4) The lack of an environmental impac6t assessment
 - (5) The unsuitable siting of the buildings in relation to Listed buildings (PPG15)
 - (6) The loss of open space (PPG17)
 - (7) The failure to provide affordable housing on site (Circular 6/98)
- 6.34 The Kensington Court Residents' Association conclude that "the revised plans offer little real improvement over the previous ones". They re-affirm their general objection to the scheme, which is "excessive in bulk and density, and which deprives the area of an important space (whether brown or green is immaterial) and threatens local amenity". The Association recommends that "a central open space should at least be left, by eliminating a substantial part of the development. The bulk and density should also be reduced, particularly the height of the block of flats".
- 6.35 The Victoria Road Residents' Association comment that "although there may have been one or two minor modifications, the proposal is still grossly excessive for this important site".
- 6.36 In general, the conclusions drawn by objectors on the revised scheme are that the revisions are only minor, and seem to have ignored the main points of objection raised by residents. The deletion of the house from the southern terrace, the re-orientation of the buildings to Aubrey Walk, and the amendments to the Campden Hill block are generally seen as improvements, but they do nothing to address the fundamental objection to the loss of the existing open space on

the site. One objector wishes it made plain to any prospective applicant that any further application for the site would 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, its trees and its vegetation, make to the Conservation Area.

7.0 CONCLUSIONS

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7.1 The following conclusions are drawn:

7.2 There is no objection to the principle of demolishing Water Tower House, as long as an acceptable scheme for its replacement is being presented.

7.3 The reservoirs, and their embankments, contain open space and attractive planting, and provide a positive and important contribution to the character and appearance of this part of the Kensington Conservation Area. There is an objection to their demolition and redevelopment where such redevelopment would result in a reduced contribution by the site to the character and appearance of the Conservation Area.

7.4 Notwithstanding the fact that the site is in fact largely covered by large buildings, the site does offer the general appearance of open space. A significant reduction in open space would present planning objections. The proposed reduction of open space on the site by a percentage of approximately 30% would be sufficient to present a ground for objection.

7.5 The site also provides a very important local recreational facility, and any reduction in this provision would also lead to a planning objection. There would be no loss of recreational space; if anything, there would be an enhancement of the facilities on this site.

7.6 The present use of the site for reservoirs is now redundant. Given the location of the site in a predominantly residential area, housing must be seen, in principle, as an acceptable land use for the site.

7.7 There is support in the Council's planning Policies and in regional guidance for the provision of housing, including affordable housing, upon suitable sites that become available. Provision of seventeen units on this site is welcomed; however, the mechanism by which the applicants seek to address the Council's policies, and Circular 6/98, is not considered likely to provide affordable housing on site. As such, the proposal does not satisfy the Council's objectives for affordable housing.

7.8 The overall site layout, scale and form of buildings, provides for a fairly densely developed site, and it is concluded that this factor manifests itself by way of an overly bulky Campden Hill Road block as well as harmful impact upon the setting of Listed Thorpe Lodge and St. George's church.

7.9 Again a result of the scale of development on the site, there would be a harmful impact upon the levels of amenity currently enjoyed by occupants of surrounding residential property, particularly by way of reduced daylight, and increased sense of enclosure.

7.10 Whilst it appears that the likely generation of vehicular movements would not be such that would lead to objections relating to on-street traffic volumes, it is concluded that the additional activity at times that are currently relatively very quiet, such as in the winter, would disrupt the existing "balance" between residential amenity and the use of the site. The intensification of use

of the site would lead to a material reduction in the levels of amenity currently enjoyed by those who live near the site.

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- 7.11 It is concluded that the proposed vehicular and pedestrian gates are unwelcome, and would create a "gated" development that would offer little to the surrounding residential community and fail to provide an amenity that would be enjoyed as a contribution to the character or appearance of the Conservation Area.
- 7.12 It is concluded that the design detail of the proposals would generally be acceptable, but that great care would need to be taken in approving the relevant facing materials.
- 7.13 It is concluded that, given appropriate controls imposed by Condition, that the matters of floodlighting, landscaping, tree protection, refuse and site servicing would be acceptable.
- 7.14 The contribution that the site can make towards the Borough's housing targets must be weighed against the loss of 30% of the open space upon the site, and the other concerns set out above.
- 7.15 It is concluded that the proposed development would result in sufficient conflict with planning Policies, and cause sufficient harm to the character and appearance of this part of the Kensington Conservation Area, such that the benefit provided by the provision of new housing would be outweighed.
- 7.16 Therefore, it is concluded that planning permission and conservation area consent should be refused for the proposals as they stand.

M.J. FRENCH
EXECUTIVE DIRECTOR, PLANNING AND CONSERVATION


List of Background Papers:

The contents of files TP/98/2126, TP/98/2127, TP/98/2129 and PP/99/00733 save for exempt or confidential information in accordance with the Local Government (Access to Information) Act 1985.

Report Prepared By: MJF
Report Approved By: LAWJ
Date Report Approved: 01/06/1999

PSC:99:06:Rep.MJF

Yours faithfully,



Derek Taylor
Area Team Leader
for
Executive Director, Planning & Conservation



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PLANNING AND CONSERVATION

THE TOWN HALL HORNTON STREET LONDON W8 7NX

Executive Director M J FRENCH FRICS Dip TP MRTPI Cert TS

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[Signature]

THE ROYAL BOROUGH OF



KENSINGTON AND CHELSEA

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Email: plndmt@rbkc.gov.uk
Mr.: D. Taylor

8th June 1999

My reference: DPS/DCC/TP/98/ Your reference:
2126/PP/99/0733

Please ask for: Mr D. Taylor

Dear Sir,

Town and Country Planning Act 1990
Camden Hill Reservoir proposals - Various matters

RECEIVED
10 JUN 1999
RECEIVED

I write in response to your letter of 2nd June 1999, and to points numbered 1 to 5 therein.

I acknowledge receipt of the revised car park layout plans, showing five additional spaces which would bring the ration of spaces to the seventeen affordable flats up to 1:1. I cannot substitute these now as formal amendments to the plans going before this Council's Planning Services Committee tonight, although I will ensure that they are brought to the attention of the Committee on an informative basis. I confirm that I have no objection to these plans being laid before the Inspector, for him to treat as he sees fit. I would point out that the extra provision would not be necessary to satisfy any Unitary Development Plan requirement; the Plan requirement is to provide a ratio of 1:1 for open market flats, but it only seeks a ration of 0.66:1 (or a two-thirds provision) for affordable housing schemes, with this requirement already satisfied by the current provision of twelve spaces for the seventeen flats.

Regarding point 2, I understand that you have now received copies of the relevant report. On Point 3, the appropriate arrangements have been made with your clients' architects.

Turning to Point 4, I confirm that where reference is made to the "Register of Open Space", the document referred to is the 1992 Open Space Survey undertaken in support of the then emerging Unitary Development Plan. This document was not subject to any public consultation.

On Point 5, I confirm that this Authority has made a return to the DETR concerning the National Land Use Database, and that this site was included in that response. The site was included in Category 5 (Other previously developed land or buildings where it is known there is potential for redevelopment but the sites do not have any allocation or planning permission). Beyond that, I must advise that specific information on individual sites is confidential information, and it would not be appropriate for me to disclose it. When the NLUD site specific data is eventually published (probably some time towards the end of this summer) for each local authority a contract permitting the publication will have to be signed by this Council, although even then the data will not include sites within the "potential for redevelopment" category as it is considered that these sites may have the greatest planning sensitivity.

In response to your last paragraph, I agree that we must ensure that over the next weeks we can agree and set aside as many matters of fact, or issues presently between us, in order to clarify the matters that may still be heard at the Public Inquiry scheduled for July.

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Appendix 19

Borough Council letter of 8-6-99

Appendix 20

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**LPAC “Possible Future Sources of
Large Housing Sites in London” (Extracts)**



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POSSIBLE FUTURE SOURCES OF LARGE HOUSING SITES IN LONDON

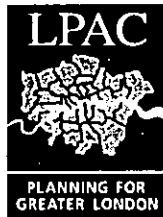
JULY 1998

This report is jointly sponsored by LPAC, the Government Office for London and the Department of the Environment, Transport and the Regions.

This report is published for information and discussion. Its findings are the consultants' and their publication does not necessarily indicate that they are accepted by the co-sponsors. Neither the co-sponsors nor their consultants can be liable for any loss or damage, however sustained, by others arising from reliance upon the contents of this report.

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Reference: CON68



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Executive Summary

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BACKGROUND

1. Halcrow Fox was commissioned jointly by the London Planning Advisory Committee (LPAC), the Government Office for London (GOL) and the Department of Environment, Transport and the Regions (DETR), in March 1997, to investigate the contribution that large sites could make to meeting the requirements for housing in London to 2016.
2. The study is part of the broader objective of achieving a sustainable future for London. The capacity of the existing built-up area to meet housing requirements is critical to achieving a more sustainable urban form. It is one of a series of studies exploring London's ability to accommodate future household growth, which include *Offices to Other Uses* (LPAC, 1997) and *Sustainable Residential Quality: New Approaches to Urban Living* (LPAC, 1998).
3. The 1992-based household projections (DoE, 1995) suggest that the number of households in London could increase by 629,000 between 1991 and 2016. The housing capacity study published by LPAC in 1994 (LHC) identified land for an additional 234,000 dwelling units for the period to 2006.
4. In the past, large sites have made a major contribution to London's housing land supply. Sites over five hectares accounted for 44% and over one hectare, 68% of the capacity identified in 1992. In the event, 53% of dwellings permitted on large sites since 1992, have been on sites not identified in that study, or subsequently in Unitary Development Plans ie they were 'windfall' permissions.
5. This study is intended to assist LPAC, the Boroughs and the new Greater London Authority (GLA), as well as informing the current revision of *Regional Planning Guidance for the South East*, RPG9.

STUDY OBJECTIVES

6. The four principal objectives of this study were to:
 - examine the recent pattern of housing land supply, in particular, the prevalence of windfall;

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- seek to identify future sources of large housing sites;
- quantify their potential contribution to future housing land supply; and
- advise on procedures to identify sites and, more generally, to bring forward sites for housing development.

The study excludes sources considered in the parallel studies, in particular, conversions from offices (Offices to Other Uses) and redevelopment of sites around town centres (Sustainable Residential Quality).

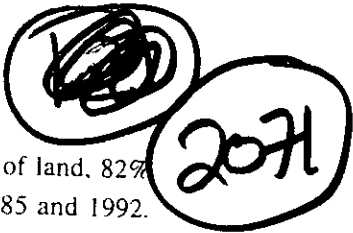
METHODOLOGY

7. The study methodology has the following main components:
 - examination of housing and employment land supply since 1985;
 - identification of potential large housing sites;
 - case studies to assess the suitability of potential sites for housing;
 - construction of scenarios for housing land release to 2016; and
 - provision of Borough housing capacity estimates and policy guidance.

Large sites were defined for this study as those of one hectare or above, except in Central London, where the threshold used was 0.5 hectares.

RECENT HOUSING AND EMPLOYMENT LAND SUPPLY

8. *London's Housing Capacity* (LPAC, 1994) identified potential for 234,000 dwellings in London for the period 1992 to 2006. By the end of 1996, permissions had been granted on 39% of the large site capacity identified in the 1994 study, slightly above expectations.
9. Between 1992 and 1996, 53% of all permissions granted were windfalls. Windfall permissions have been granted at four times the rate assumed in the capacity study. 46% of permissions on windfall sites have been for between ten and 49 dwellings, compared with 23% on identified capacity study sites. These findings are similar to those for local authorities outside London.
10. Based on the London Development Monitoring System, sites in industrial or commercial use have provided 24% of all large permissions granted for housing, 1992 to 1996. Residential uses contributed around 19%.

- 
11. Based on an analysis of the Land Use Change Statistics, 2,231 hectares of land, 82% of which were brownfield sites, were developed for housing between 1985 and 1992. The largest separately identified previous use was residential (673 ha, 30%) followed by industry and commercial (292 ha, 13%). Vacant urban land, previously developed, provided 533 hectares (24%). Much of this would have been in industrial or commercial uses before becoming vacant. Rural uses, the largest of which was Outdoor Recreation, contributed 261 hectares (12%).
 12. 1,520 hectares of land were developed for industry and commerce, between 1985 and 1992. 768 hectares (50%) were already in those uses. Only 60 hectares (4%) came from residential uses. The net rate of change from industrial to residential uses was, at a minimum, 29 hectares per year and may have been as high as 96 hectares per year. Since 1992, there is evidence that industrial and commercial uses have made an increased contribution to housing land supply.

POTENTIAL SOURCES OF NEW LARGE HOUSING SITES

13. Potential new large housing sites have been identified by desk study and contacts with landowners and local authorities. The search excluded Green Belt, formal open space, town centres and existing residential areas. All existing industrial and warehousing sites in London were included as potential.
14. 9,480 hectares of potential housing land have been identified, principally in industry and commercial uses, community services, transport and utilities and outdoor recreation. The average site size, excluding industrial sites, was 3.5 hectares. Those landowners able to assist with the study identified 350 hectares of sites, which are likely to meet policy criteria, which they intend to dispose for housing development.
15. Apart from sites identified by landowners, most of the remaining potential sites are occupied and it is only possible in a strategic study to assess the proportions of such sites which are likely to become available for housing in future.

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FUTURE LAND REQUIREMENTS FOR EMPLOYMENT

16. Land previously in industrial use has been a significant source of housing land in London since 1985 and forms a key component of the potential future housing land supply.
17. Three scenarios covering future employment prospects in London have been constructed. These are a Maximum Employment, a Low Employment and a Balanced Employment and Housing scenario.
18. Employment in manufacturing and wholesale distribution in London is likely to continue to decline to 2016, potentially releasing existing sites for other uses. Overall employment is likely to change by 2016 within the range +6% to -3% from present levels.
19. The scenarios take broad account of labour demand and workplace location, demographic projections of households, resident labour supply and potential changes in commuting.
20. Assessments of future industrial land requirements have been provided, based on a range of corroborative analyses, including employment projections, existing land in industrial and warehouse use and recent patterns of land use change.
21. Between 690 hectares (9%) and 2,170 hectares (29%) of the existing stock of land in industrial or warehouse use could be released for other uses by 2016. The Balanced Employment and Housing scenario would result in the release of 1,030 hectares (14%) of existing land in industrial and warehouse use. 75% of the industrial land released could be available for housing development.

SITE DEVELOPMENT CASE STUDIES

22. Case studies were undertaken on a representative sample of 100 potential housing sites. 14% of sites, mainly in transport and utilities use suffer significant physical constraints. 23% of sites are also definitely contaminated, at least in part, again mainly in transport, utilities or industrial uses. Development of any sort on 15% of the sites would be restricted by national planning policies. At present, a further 55% are designated in UDPs for a use other than housing. 24% of sites are in multiple ownership or occupancy.

23. The viability of residential development and the values of sites in alternative uses which are likely to be permitted were assessed using a residual valuation model. Two versions of this model have been used : the Market Based chooses the most profitable form of housing development for that site and the Policy Based, where higher densities are applied to maximise the capacity of sites, according to their location and size. Under the Market Based model, over 90% of sites would be viable for residential development. This decreases to 65% of sites under the Policy Based model. Taking an average, 59 sites (yielding 9,500 dwellings) would have the highest value use as residential under the Market Based model. This decreases to 43 sites (11,700 dwellings) under the Policy Based model.
24. Over time, as market conditions and preferences change, more sites will become viable for housing at the Policy Based densities. This potential for higher densities will need to be taken into account explicitly in phasing future housing site releases.
25. For the purposes of the study, the allocation of a site for another use was not considered to be an absolute constraint on housing development. When all constraints are taken into account, only 24% of case study sites would be brought forward for housing under the Policy Based model, increasing to 60% under the Market Based. Under the Policy Based model, the defining constraints for most sites are physical constraints combined with poor residential development value. Under the Market Based model, higher values in alternative uses are the defining constraint on those sites which do not proceed. Between 67% and 100% of Community Services sites and 44% to 100% of Outdoor Recreation sites would be likely to come forward. Less than 20% of transport, industrial or vacant sites would come forward under the Policy Based model.

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ESTIMATES OF FUTURE LAND SUPPLY FROM LARGE SITES

26. Estimates of housing capacity for each Borough have been prepared using three complementary procedures. In Greater London, as a whole, land likely to come forward by 2016 will comprise:
- 330 hectares of sites identified by landowners and local authorities as very likely to come forward and suitable for housing development;
 - 560 hectares of land in all other uses except industry, assessed by the use of London-wide development factors applied to the sites identified in each Borough; and
 - between 610 and 1,720 hectares of industrial, warehouse and vacant previously developed sites, assessed by the use of London-wide land release factors applied to the stock of land in those uses in each Borough.

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27. Applying housing densities derived from the case studies, three estimates of potential housing capacity have been provided for each Borough. In total, new potential housing sites could provide between 63,000 and 116,000 new dwellings in London in the period 1996-2016. These are only part of London's housing capacity, but would provide between four and seven years supply of land required at the development rates assumed in Strategic Guidance for London (RPG3).

SECURING FUTURE HOUSING LAND SUPPLY

Key recommendations

28. This study has demonstrated that a hierarchical or sequential approach to identifying housing capacity at the Borough level is essential. This needs to take account of the competing priorities for other land uses. Specific housing sites should be identified, wherever possible. Other sites may not be identifiable but their potential contribution to housing supply can be estimated.
29. A London-wide land use database is desirable. Recording of previous land uses in LDMS should include the Land Use Change Statistics categories to provide consistency between the sources. Annual monitoring of housing densities should be pursued using LDMS.
30. A further study of employment land requirements in each Borough should be pursued, refining the approach adopted in this study.
31. Regular liaison must be maintained in future capacity studies with major public and private landowners, the House Builders Federation, housing developers and social housing agencies.
32. Residual valuation models and similar tools should be used to appraise the viability of residential development and alternative use values of potential housing sites. Further study of the economics of affordable housing needs to be pursued.
33. Integrated policies and action, led by the Boroughs or other public agencies will be needed to secure the development of difficult potential housing sites. Clear planning policies and briefs, flexible use of housing density and affordable housing requirements, contaminated site registers, compulsory purchase and specific grants are all recommended to assist in securing housing development on difficult sites.

5.2. OVERALL POTENTIAL LARGE HOUSING SITES

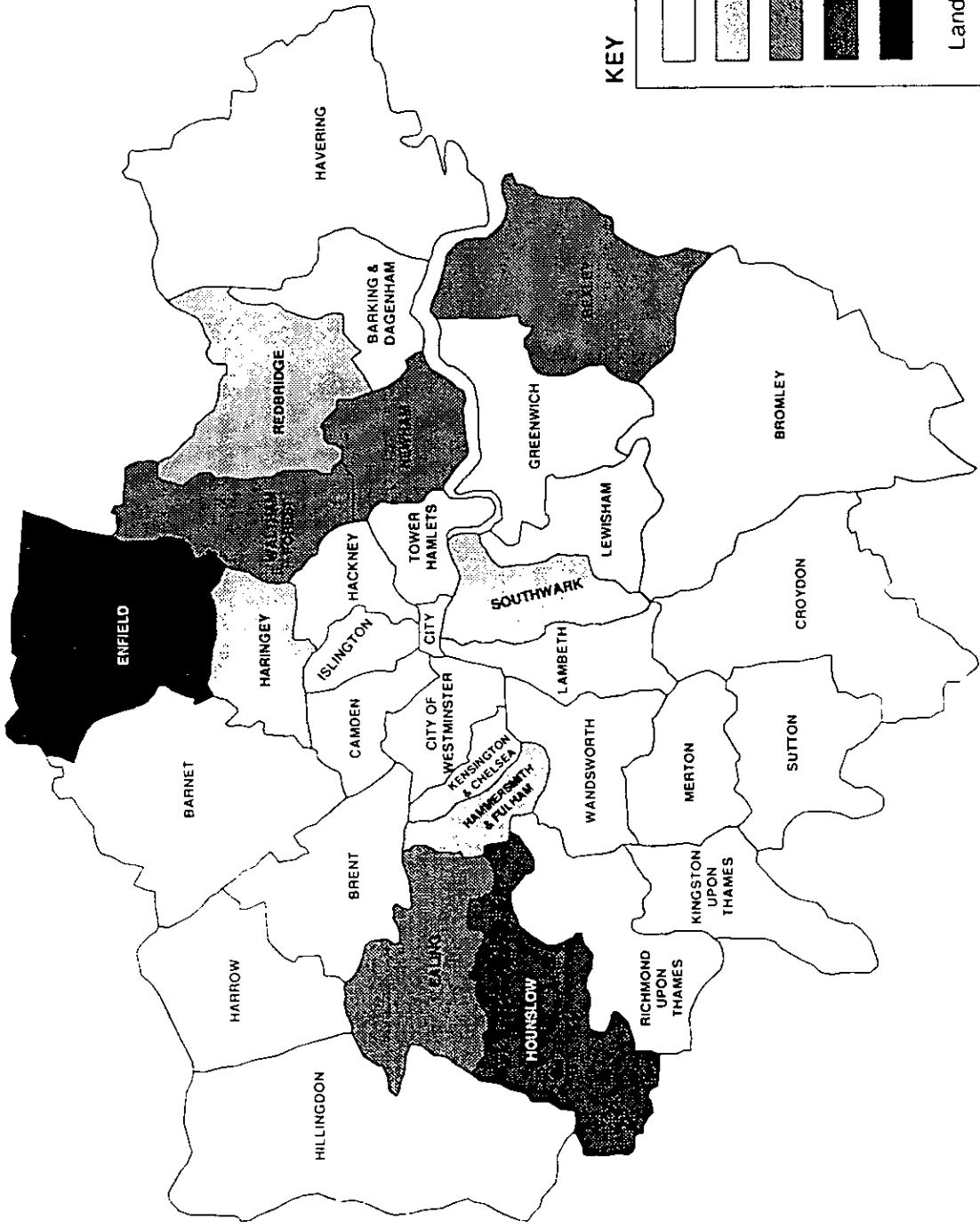
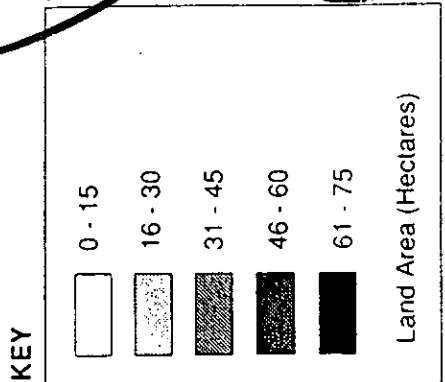
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- 5.2.1. Overall, 1,108 sites with a total area of 9,480 hectares have been identified. These have been presented in Table 5.1, using the land use classification used by DETR in the Land Use Change Statistics. Overall, 7,867 hectares (83%) of the land identified are in Industrial and Commercial uses, with 5% each in Community Services, Outdoor Recreation and Transport and Utilities. Excluding Industry and Warehousing, the average site size was 3.5 hectares, rather smaller than in the 1992 Capacity Study.
- 5.2.2. Information was obtained from many private and public landowners. Those sites identified by landowners are separated out in the final column of Table 5.1. Details of many of the landowners surveyed are in Appendix B.
- 5.2.3. All of the sites identified are held on a site database. Some landowners were prepared to make site information available, on condition that only aggregate information is reported. Many major landowners, including the Ministry of Defence, health trusts and universities, were unable or unwilling to provide details of their property strategies or disposal programmes.
- 5.2.4. Each potential land source is discussed in turn. This analysis has been supplemented by case studies of individual sites, set out in Section 7. Each source has been considered in relation to:
- the total land area identified;
 - recent patterns of land release for housing;
 - future operational requirements and likely constraints on the development for housing; and
 - an overview of the likely yield from each source.

5.3. TRANSPORT AND UTILITIES

- 5.3.1. The location of the potential sites identified is summarised in Figure 5.1. 446 hectares have been identified, of which 19% is considered by the landowners as suitable for housing development and likely to be released in the next five years.
- 5.3.2. Between 1985 and 1992, 88 hectares of land in Transport and Utilities use were developed for housing, according to the Land Use Change Statistics, an average of eleven hectares per year. Most was former railway land. Since 1992, the rate of release is likely to have increased as the privatised utilities rationalise operational land requirements.

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Potential Large Housing Sites: Transport and Utilities

Source: Halcrow Fox Surveys, 1997

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Water

- 5.3.3. The site search identified approximately 217 hectares of land in Thames Water ownership. Much of this land is still in operational use and may never be released for development.
- 5.3.4. Thames Water has recently disposed of several sites in London for residential development, including the Barnes Riverside and the waterworks at Stoke Newington. Other sites have planning permission or UDP designation for housing. It is actively seeking to release surplus sites. Surplus sites identified by Thames Water are summarised in Table 5.2.

Table 5.2: Thames Water estimates of surplus land by planning area and planning status (ha)

Category	Centra 1	Outer East	Outer West	Inner East	Inner West	Total
Sites without major planning constraints	2		9			12
Potential surplus with planning issues to be resolved		4	6	11	1	22
Surplus land with MOL/Green Belt/SSSI status	0.5	47	45			93
Total	2.5	51	60	11	1	127

Source : Thames Water

- 5.3.5. Thames Water estimates that it has a total of 127 hectares of land within Greater London which is likely to be surplus to requirements. 93 hectares are designated as Green Belt, Metropolitan Open Land, or Sites of Special Scientific Interest, and has been excluded from this study.
- 5.3.6. Twelve hectares have no major policy constraints and with the resolution of access, services and layout, could be developed in the short term. A further 22 hectares are likely to become surplus to operational needs in the medium term. These sites are not subject to significant planning constraints but difficulties such as access might delay development. The precise location of sites is commercially confidential. Fifteen hectares of potentially surplus land (44%) are in Outer West London, while eleven hectares (32%) are in Inner East London.

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- 5.3.7. The site search revealed 182 hectares of other sites. While potentially suitable for housing development, a majority are likely to be essential to future operations or subject to absolute policy constraints.



British Gas

- 5.3.8. British Gas retains a significant land holding in Greater London. Many of these sites are in older industrial areas, although there are several in or near to town centres. The site search suggests that British Gas owns at least 48 hectares of land which are potentially suitable for housing, as well as a number of playing fields in Outer London.
- 5.3.9. British Gas has a legacy of highly contaminated sites, used for the manufacture of town gas. The progressive installation of high pressure storage has made many gasholders redundant. More recently, rationalisation has led to the release of some depots and showrooms. Since 1985, several town gas and gasholder sites have been sold for redevelopment, including Greenwich Peninsula and the Kingston town centre site. British Gas intend to dispose of their remaining surplus sites over the next three to five years.
- 5.3.10. British Gas declined to provide information about future land disposals for this study. Public concern about contamination and the impacts this may have on property values was also a factor in their reluctance to discuss intended disposals. British Gas are seeking tenders for surplus property from a single bidder in accordance with an estate management and disposals strategy.
- 5.3.11. Many larger sites contain areas of contamination. It is difficult to generalise about the extent of contamination and remediation on these sites because:
- concentration, depth and spatial extent varies greatly;
 - contamination varies with the range of historic activities; and
 - remediation strategies depend both on site conditions and future use.
- 5.3.12. Remediation for residential use is more costly than for other uses. Many sites are, by reason of location and adjacent uses, better suited to commercial rather than residential development. British Gas takes the view that financial support from public agencies, such as English Partnerships, is critical to their land release strategy, as at the Greenwich Peninsula.

8. Estimates of Future Land Supply From Large Sites

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8.1. INTRODUCTION

8.1.1. The results of the site search, reported in Section 5, the industrial land requirements in Section 6 and the case studies are brought together to provide indicative estimates of the likely future housing land supply from large sites. These are presented at the Borough level, with appropriate advice on their likely accuracy for individual Boroughs.

8.1.2. The procedures used are set out in Figure 8.1, which provides an overview of how potential large sites are likely to contribute to overall housing capacity.

8.1.3. The potential large sites identified in Table 5.1 have been sub-divided into two groups by existing land use:

- all other uses, except industry, and warehouses and vacant previously developed; and
- existing industry, warehouse and vacant previously developed sites.

8.2. THE CONTRIBUTION FROM ALL OTHER USES IDENTIFIED TO FUTURE HOUSING CAPACITY

Sites Identified by Landowners and Local Authorities

8.2.1. The potential sites identified by landowners, reported in Table 5.1, supplemented by sites identified by the Boroughs as likely to come forward for housing in the near future were reviewed by the study team. A small proportion were rejected as unsuitable for housing on grounds of national or statutory policy constraints. The remainder were considered very likely to be brought forward for housing and transferred site by site to Table 8.2.

Other Potential Sites (excluding Industry and Warehousing)

8.2.2. All other potential sites were tabulated by Borough and land use group. For each land use group, a London-wide development factor was devised based on the case study results, discussions with landowners and the Boroughs and experience of the study team. These development factors are the probabilities that sites identified as potential for housing will be developed successfully before 2016. They drew, in particular, on the case studies which examined viability and the interaction of constraints in some detail. They also took account of the analysis of recent planning permissions, discussions with landowners, developers, local authorities and the service providers themselves. Policy constraints are treated, as elsewhere in this study, as only being

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absolute if development would be contrary to national or statutory policy guidance. The development factors used are set out in Table 8.1.

Table 8.1: Remaining Other Potential Housing Sites : Development Factors Applied to Stock of Potential Sites (excluding industry and warehousing)

Land Use Group	Existing Land Use	Development Factor
Transport and Utilities	Water	0.25
	Gas	0.5
	Electricity	0
	Telecommunications	0
	Railways	0.3
	Car Parks	0.2
Industry and Commerce	Public Authority Depots	0.4
	Offices	0.3
	Retail	0.3
Community Services	Leisure and Community Buildings	0
	Schools	see note 1
	Universities	0
	Health Services	0.3
Vacant Land	Vacant Never Developed	0.2
Outdoor Recreation	Allotments	0.4
	Free-standing Playing Fields	0.4
Defence	Defence	0.5
Agriculture	Agriculture	0

Note 1: For each school site over 7.0 hectares, 2 hectares assumed to be developed.
Source: Halcrow Fox analysis

8.2.3. The development factors were applied on a site by site basis to the potential sites in each Borough. The likely contribution of all other sites identified (except industry and warehousing) is summarised at a Borough level in Table 8.2. The likely housing land supply in Greater London from all other uses has been assessed at around 900 hectares, of which 330 hectares were specifically identified by landowners or the Borough concerned.

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Table 8.2: London Boroughs: The Contribution of Identified Sites to Future Housing Capacity (all land sources except industry, vacant previously developed, and warehouse and storage) (hectares).

A Borough	B Sites Identified by Landowners and Local Authorities likely to be developed	C Total Sites otherwise identified by Study	D Sites in C likely to be developed	E Total Sites Area likely to be developed
Barking & Dagenham	6	15	6	12
Barnet	59	96	33	92
Bexley	2	163	43	45
Brent	8	39	11	19
Bromley	5	156	48	53
Camden	2	5	1	3
City Of London	0	4	4	4
Croydon	1	85	27	28
Ealing	37	42	16	53
Enfield	3	118	36	39
Greenwich	12	99	27	39
Hackney	4	2	1	5
Haringey	44	29	9	53
Harrow	36	21	9	45
Havering	4	75	24	28
Hillingdon	5	61	23	28
Hounslow	9	121	37	46
Hammersmith & Fulham	0	43	12	12
Islington	0	11	3	3
Kensington & Chelsea	0	4	1	1
Kingston	0	16	6	6
Lambeth	8	22	8	16
Lewisham	1	18	8	9
Merton	17	36	13	30
Newham	33	52	22	55
Redbridge	30	79	28	58
Richmond	0	19	7	7
Southwark	5	50	18	23
Sutton	0	56	21	21
Tower Hamlets	0	8	3	3
W. Forest	0	86	27	27
Wandsworth	0	50	15	15
Westminster	0	24	10	10
TOTAL	331	1,705	557	888

Source: Halcrow Fox analysis

Appendix 21

2082

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Thames Water letter of 18-5-97

Our Ref. 9372/2/6
Your Ref. 9176/lpac-gol
Date 18 August 1997



2083

Thames Water Property

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Telefax 0118 959 3599

Direct Telephone 0118 9 593451

E mail deb.stephens@thameswater.co.uk

Halcrow Fox
Vineyard House
44 Brook Green
Hammersmith
London W6 7BY



for the attention of Paul Quarterman/Tava Wilson

Dear Mr Quarterman

LARGE SCALE LAND RELEASES

Your letter of 17 July unfortunately took some time to reach me at the office and I have been unable to respond at all quickly. Please forgive the delay - I realise how tight your deadline is and can only say that pressure of other work is the reason, not any reluctance to provide you with information.

Please find attached a list of land areas by Borough, which Tava Wilson requested in July. You will notice that some figures have been increased slightly - they were rechecked and this is a more accurate figure. Should you still wish to involve us in the next stage of your case study, we can provide an example of sites which could be made available. If you need this information immediately, my colleague Richard Hill (0118 959 3473) or our boss Margaret Grey (0118 9593268) will be able to help with a site plan and address etc. Otherwise I will be back from holiday on 5th September.

Yours sincerely,

Deb Stephens

Deborah Stephens
TOWN PLANNING MANAGER
THAMES WATER PROPERTY

2084

LONDON HOUSING LAND STUDY - LPAC/GOL JULY 1997

LARGE SCALE LAND RELEASES

Category:

1. Schemes in progress

Central 2.14ha
 OW 9.43ha
 TOTAL c12 ha

2. Surplus & w'out severe policy constraints

C <1 Ha
 OE 4 Ha
 OW 6 Ha
 IE 11 Ha
 IW 1 Ha
 TOTAL c 22 Ha

Borough	Area of London	Ha
Central	Central	2.14
Richmond	OW	9.43
Southwark	C	<1
Barking	OE	<2
Bexley	OE	2.41
Brentford	OW	>4
Croydon	OW	<1
Hounslow	OW	1.22
Merton	OW	1.36
Enfield	IE	1.31
Enfield	IE	1.01
Greenwich	IE	1.28
Newham	IE	c5?
Walthamstow	IE	1.28
Barnet	IW	1

5. GB/MOL/SSSI

Central 0.5
 OE c54
 OW c70
 TOTAL c 124

Camden	C	0.5
Bexley	OE	c44
Redbridge	OE	9
Walthamstow	OE	1.22+?
Dartford	OW	?
Croydon	OW	2
Enfield	OW	c27
Hillingdon	OW	3
Hounslow	OW	3.5
Walthamstow	OW	7+
Richmond	OW	2+?
Barnet	OW	c25

2085

[Handwritten signature]

LONDON HOUSING LAND STUDY - LPAC/GOL JULY 1997 LARGE SCALE LAND RELEASES

Category	Central	Central	Central	Central	Central	Central
One	12	21			6	
Two	22		4		6	11
Three	0					
Four	0					
Five	124	0.5	34		70	0
TOTAL	158	2.5	38		75	11

2086
~~1234~~

Private and Confidential

HALCROW FOX

Our Ref : 9176/lpac-gol
Your Ref : 9372/2/6

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Offices in
England, Scotland, Hong Kong,
Indonesia and Malaysia.

Thames Water Property
Nugent House (RBH-Gnd N)
Vastern Road
Reading
Berkshire
RG1 8DB

17 July 1997

Dear Ms Stephens

Large Scale Land Releases

Thank you for your letter of 14 July 1997 detailing the type of land that may and may not come forward for residential development from the Thames Water land holdings, and the catagorised table providing land area totals.

After our telephone conversation today I would like to request two further pieces of information. The first, as agreed, is to redefine the table you provided in terms of borough totals, rather than LPAC quadrant totals, for land area holdings within the same catagories. The second, is if possible, to provide between 2 and 10 site plans and details (i.e. name, address, and land area, and if known any policy constraints in outline) for Halcrow Fox to take forward for case study in the next stage of our project.

We appreciate the sensitive nature of these disclosures and I can only reiterate Paul Quarterman's expression of confidentiality for the information you provide us with. The intention of looking at these case studies is to examine the process involved with releasing complicated sites for development, which I think you will agree could be of help in the future in terms of releasing existing land holdings into the development market.

Thank you for your help and I look forward to hearing from you again soon.

Yours sincerely

Tava Walton



2087

BA

Appendix 22

Kensington & Chelsea UDP (Extracts)

UDP

as adopted 28th August 1995

THE ROYAL
BOROUGH OF



KENSINGTON
AND CHELSEA

The Royal Borough of Kensington and Chelsea: Unitary Development Plan

2089

**STRAT 1**

TO GIVE PRIORITY TO THE PROTECTION AND ENHANCEMENT OF THE RESIDENTIAL CHARACTER AND AMENITY OF THE ROYAL BOROUGH.

STRAT 2

TO SEEK AN INCREASE IN RESIDENTIAL PROVISION WITHIN THE ROYAL BOROUGH BY RESTRICTING THE LOSS OF LAND AND BUILDINGS WITH EXISTING RESIDENTIAL USE AND ENCOURAGE THE PROVISION OF ADDITIONAL PERMANENT RESIDENTIAL ACCOMMODATION ON SUITABLE SITES AND BUILDINGS WHERE APPROPRIATE.

STRAT 3

TO SEEK THE CONTINUED ECONOMIC GROWTH OF THE METROPOLITAN AREA BY SUPPORTING CHANGE AND DEVELOPMENT IN THOSE PARTS OF LONDON AND THE ROYAL BOROUGH THAT ARE RECOGNISED AS HAVING CAPACITY FOR ADDITIONAL COMMERCIAL OR INDUSTRIAL ACTIVITY.

STRAT 4

TO SEEK A SAFE, EFFICIENT AND ENVIRONMENTALLY ACCEPTABLE TRANSPORT SYSTEM FOR THE METROPOLITAN AREA, WHILST PROTECTING THE RESIDENTIAL CHARACTER, AMENITY AND QUALITY OF THE ROYAL BOROUGH.

STRAT 5

TO SEEK TO ENSURE THAT ALL DEVELOPMENT PRESERVES OR ENHANCES THE RESIDENTIAL CHARACTER OF THE ROYAL BOROUGH.

STRAT 6

TO PROTECT LISTED BUILDINGS AND TO PRESERVE OR ENHANCE THE CHARACTER OR APPEARANCE OF CONSERVATION AREAS, AREAS OF METROPOLITAN IMPORTANCE, AREAS OF LOCAL CHARACTER, AND OTHER BUILDINGS OR PLACES OF INTEREST.

STRAT 7

TO PROMOTE HIGH ENVIRONMENTAL AND ARCHITECTURAL DESIGN STANDARDS IN NEW DEVELOPMENTS AND ALTERATIONS AND IN ADDITIONS TO EXISTING BUILDINGS.

STRAT 8

TO PROTECT LONDON'S SKYLINE AND STRATEGIC VIEWS, PARTICULARLY THE STRATEGIC VIEW OF ST PAUL'S CATHEDRAL FROM KING HENRY'S MOUND.

2090

De

STRAT 9

TO PROTECT THE RIVER THAMES AND ITS SETTING, TO ENHANCE ITS CHARACTER AND AMENITY, AND ENSURE THAT THE INTEGRITY OF THE RIVER FLOOD DEFENCES IS MAINTAINED.

STRAT 10

TO HAVE REGARD FOR NATURE CONSERVATION AND THE PROTECTION OF THE NATURAL HABITAT AND WILDLIFE ENVIRONMENT IN THE CONSIDERATION OF ALL PROPOSALS.

STRAT 11

TO ENSURE THAT PEOPLE WITH SPECIAL MOBILITY NEEDS HAVE EQUALITY OF PHYSICAL ACCESS THROUGHOUT THE BOROUGH.

STRAT 12

TO PROTECT ANCIENT MONUMENTS AND SITES OF ARCHAEOLOGICAL INTEREST.

STRAT 13

TO ENSURE THE CONTRIBUTION OF THE ROYAL BOROUGH TO THE DWELLING STOCK OF GREATER LONDON IS NOT DIMINISHED AND IS INCREASED WHEREVER APPROPRIATE.

STRAT 14

TO SEEK TO MAXIMISE THE RESIDENTIAL CAPACITY OF THE BOROUGH IN LINE WITH STRATEGIC GUIDANCE FOR LONDON.

STRAT 15

TO ENCOURAGE AN ADEQUATE AND CONTINUING SUPPLY OF LAND FOR NEW HOUSING THROUGH THE DEVELOPMENT OF VACANT AND UNDER-USED LAND FOR RESIDENTIAL USE IN APPROPRIATE LOCATIONS.

STRAT 16

TO SEEK AN INCREASE IN THE AMOUNT AND RANGE OF SIZES AND TYPES OF DWELLINGS TO MEET THE NEEDS OF THOSE SEEKING PERMANENT ACCOMMODATION IN THE ROYAL BOROUGH, WHILST MAINTAINING THE OVERALL QUALITY OF THE RESIDENTIAL ENVIRONMENT.

STRAT 17

TO SUPPORT AND MAINTAIN THE EXISTING DIVERSE AND VIBRANT LOCAL ECONOMY AND TO FOSTER ECONOMIC GROWTH WHERE APPROPRIATE WHILST PROTECTING THE ROYAL BOROUGH FROM DEVELOPMENT INAPPROPRIATE TO THE RESIDENTIAL ENVIRONMENT BY ITS NATURE OR THE SCALE OF ACTIVITIES GENERATED.



STRAT 18

TO ENCOURAGE LARGE-SCALE BUSINESS DEVELOPMENTS TO LOCATE IN THOSE PARTS OF LONDON AND THE ROYAL BOROUGH WHICH HAVE THE CAPACITY FOR ADDITIONAL ECONOMIC ACTIVITY WITHOUT HARMING AMENITY.

STRAT 19

TO SECURE THE PROVISION OF A RANGE OF BUSINESS PREMISES SUITABLE FOR A VARIETY OF BUSINESS ACTIVITIES, WHILST GIVING PRIORITY TO THE PROVISION OF SMALL UNITS IN THE ROYAL BOROUGH.

STRAT 20

TO SUPPORT AND ENCOURAGE THE IMPROVEMENT OF THE PUBLIC TRANSPORT NETWORK FOR THE METROPOLITAN AREA.

STRAT 21

TO SEEK THE REDUCTION OF NON-ESSENTIAL TRAFFIC MOVEMENT WITHIN THE METROPOLITAN AREA.

STRAT 22

TO SEEK AN IMPROVEMENT IN ACCESS AND MOVEMENT FOR ESSENTIAL TRAFFIC.

STRAT 23

TO SEEK TO PROMOTE A SAFE AND EFFICIENT TRANSPORT NETWORK FOR ALL MODES OF TRAVEL INCLUDING WALKING.

STRAT 24

TO SUPPORT THE MAINTENANCE OF A STRATEGIC LONDON ROAD NETWORK AND TO ENSURE A CONSISTENT ROAD HIERARCHY BETWEEN THE ROYAL BOROUGH AND ADJOINING BOROUGHES.

STRAT 25

TO SUPPORT MEASURES TO REDUCE THE IMPACT OF VEHICLE EMISSIONS.

STRAT 26

TO SUPPORT THE DEVELOPMENT OF A STRATEGIC CYCLE NETWORK.

STRAT 27

TO ENCOURAGE THE APPROPRIATE USE OF RAIL AND WATER FOR CROSS-LONDON PASSENGER AND FREIGHT TRANSPORT.

STRAT 28

TO SUPPORT AN EFFECTIVE LONDON-WIDE CONTROL OF NIGHT-TIME AND WEEKEND LORRY MOVEMENT.

STRAT 29

TO SEEK TO ENHANCE THE VITALITY AND VIABILITY OF PRINCIPAL AND LOCAL SHOPPING CENTRES AND TO ENSURE THAT THEY REMAIN THE FOCUS OF THE PROVISION OF SHOPPING FACILITIES IN THE ROYAL BOROUGH.

STRAT 30

TO ENSURE THE CONTINUED ENHANCEMENT OF THE INTERNATIONAL, NATIONAL AND REGIONAL RETAIL ROLE OF THE PRINCIPAL SHOPPING CENTRES.

STRAT 31

TO ENSURE THAT THE NEEDS OF THOSE WHO LIVE AND WORK IN THE ROYAL BOROUGH ARE MET BY SHOPS AND SERVICES WHICH ARE EASILY ACCESSIBLE.

STRAT 32

TO PROTECT AND ENCOURAGE SOCIAL AND COMMUNITY FACILITIES WHICH ARE EASILY ACCESSIBLE TO MEET THE NEEDS OF THOSE WHO LIVE, WORK AND STUDY IN THE ROYAL BOROUGH.

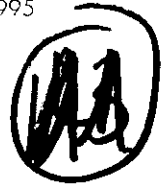
STRAT 33

TO RESTRICT FURTHER NEW HOTEL DEVELOPMENT IN ORDER TO PROTECT THE RESIDENTIAL CHARACTER OF THE ROYAL BOROUGH.

(Handwritten scribble)

2092

2093

**STRAT 34**

TO ENSURE THE CONTINUED CONTRIBUTION OF SPORTS, LEISURE AND RECREATION PROVISION, INCLUDING ARTS, CULTURAL AND ENTERTAINMENT FACILITIES IN THE ROYAL BOROUGH, TO THE LOCAL AND METROPOLITAN AREA.

STRAT 35

TO MAINTAIN AND INCREASE THE PROVISION AND QUALITY OF OPEN SPACE OF LOCAL AND METROPOLITAN VALUE.

STRAT 36

TO ENCOURAGE THE PROVISION OF A CONTINUOUS THAMES PATH ALONG THE RIVERSIDE AND THE MAINTENANCE AND IMPROVEMENT OF ACCESS TO THE RIVER.

STRAT 37

TO SEEK THE APPROPRIATE ALLOCATION AND PROVISION OF LAND FOR PUBLIC UTILITIES PROVIDING INFRASTRUCTURE OR SERVICES TO MEET THE NEEDS OF THE COMMUNITY IN THE LOCAL AND METROPOLITAN AREA.

STRAT 38

TO ENCOURAGE APPROPRIATE AND NEW METHODS OF DISPOSING OF AND RECYCLING LONDON'S WASTE AND THE CONSEQUENT CONSERVATION OF NON-RENEWABLE RESOURCES.

AREAS OF LOCAL CHARACTER

2094



- 2.23** Areas of Local Character contribute to the diversity and interest of the Borough and are found both inside and outside existing conservation areas, and have a distinct character which the Council will seek to preserve or enhance.

The Grand Union Canal

- 2.24** The Grand Union Canal in the north of the Borough provides a welcome break in the built-up area. It has a unique character which should be protected. It is also a Site of Metropolitan Importance for Nature Conservation. The opportunity will be taken, in connection with any development, to improve the visual appearance of canalside areas, in a manner sensitive to the type of development and the character of the canal. The canal and its towpath also have further potential for transport and leisure activities. These will be encouraged, providing they are not environmentally damaging.

CD16 TO RESIST DEVELOPMENT THAT WOULD ADVERSELY AFFECT THE SETTING OF THE CANAL.

CD17 TO ENCOURAGE USE OF THE CANAL FOR THE MOVEMENT OF FREIGHT AND PASSENGERS AND FOR RECREATION.

CD18 TO ENCOURAGE CANALSIDE DEVELOPMENT WHICH RELATES TO WATER-BASED ACTIVITIES AND RECREATION.

CD19 TO ENCOURAGE IMPROVED ACCESS TO THE CANALSIDE.

- 2.25** Residential moorings can provide life and colour to the canalside scene, but they should not conflict with other canal users or local amenity.

CD20 TO PERMIT RESIDENTIAL MOORINGS ON THE GRAND UNION CANAL PROVIDING:

- (a) THERE ARE ADEQUATE SERVICES FOR PERMANENTLY MOORED VESSELS;
- (b) OTHER CANAL USERS (BOTH WATER AND LAND-BASED) ARE NOT ADVERSELY AFFECTED; AND
- (c) LOCAL RESIDENTIAL AMENITY IS NOT AFFECTED.

Public Open Space

- 2.26** Parks and gardens under the control of the Council provide a valuable amenity, wildlife and recreational resource. It is important that all public open space is protected. (See also Leisure and Recreation Chapter.)

~~1995~~ 2095

Private Open Space

2.27 In addition there are other important open spaces not under the Council's control which contribute significantly to the quality of the urban environment. They are valuable not only because some public access may be afforded, but also for their history, wildlife value and visual amenity. They include some of the Royal Hospital grounds, Burton's Court, the Chelsea Physic Garden, Chelsea Rectory garden, the Moravian Burial Ground, Kelfield Gardens, the grounds of the Duke of York's Headquarters and the grounds of the College of St Mark and St John, Chelsea. (See also Leisure and Recreation Chapter.)

CD21 TO PROTECT AND ENHANCE, AND TO RESIST THE LOSS OF EXISTING PUBLIC AND PRIVATE OPEN SPACE WHICH MAKES, OR IS CAPABLE OF MAKING, A CONTRIBUTION TO AN AREA'S CHARACTER OR APPEARANCE; AND TO RESIST PROPOSALS WHICH WOULD ADVERSELY AFFECT ITS SETTING.

Garden Squares

2.28 There are over 100 garden squares in the Borough, which are major elements in its character providing welcome contrast to the densely built-up townscape. The mature trees, shrubs and other planted areas combine with boundary railings to give areas which are attractive, secluded, relatively peaceful and can provide wildlife habitats. This rather fragile character may be destroyed by even the most minor development. The Council considers that protection of their special character is of great importance. Further policies are set out in the Leisure and Recreation Chapter and Transportation Chapter. Minor proposals relating to the gardens' use as open space will be treated on their merits.

CD22 TO RESIST DEVELOPMENT IN, ON, OVER OR UNDER GARDEN SQUARES, IN ORDER TO PROTECT THEIR EXISTING CHARACTER; AND TO PROMOTE PROPOSALS FOR THEIR ENHANCEMENT.

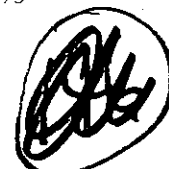
Gardens of Special Historic Interest

2.29 The following gardens and open spaces are included in the Register of Parks and Gardens of Special Historic Interest in England compiled by English Heritage: The Bolions, Brompton Cemetery, Cadogan Place, Chelsea Physic Garden, 100 Cheyne Walk, Edwardes Square, Hons Place, Holland Park, Kensal Green Cemetery, Kensington Gardens, Ladbroke Square Gardens, Royal Hospital, Chelsea and Ranelagh Gardens and St Luke's Gardens.

CD23 TO PROTECT PARKS AND GARDENS OF SPECIAL HISTORIC INTEREST FROM DEVELOPMENT WHICH WOULD HAVE AN ADVERSE EFFECT ON THE SITE, SETTING OR ENJOYMENT OF ANY PART OF THEIR GROUNDS AND TO ENCOURAGE THE MAINTENANCE OF THEIR HISTORIC CHARACTER.

Plot Ratio for Non-Residential Development

2096



3.5 Plot ratio is used to assess the maximum quantity of accommodation which may be provided in non-residential developments, and is a planning tool which can indicate building bulk and levels of activity likely to be generated by development of a site. Plot ratio is not an exact control. In assessing what would be an acceptable building bulk for a site, the plot ratio standard will be the starting point. However, it cannot of itself be the determining factor, because, for example, a building with above average floor-to-ceiling heights will have a greater building bulk, but will have the same plot ratio as a lower building. The emphasis will be on the design and compatibility with adjoining buildings, the effect on the character and amenity of the area and on traffic. The Council is concerned that development to high plot ratios allowed in the past has had harmful consequences for the character and environment of the Borough. The Council will therefore be seeking lower plot ratios in new development in order to achieve a reduction in the intensity of development and thereby protect the residential character and quality of environment of the Borough. In all cases critical examination of the massing, traffic generation, access to public transport and employment density of the scheme will also be undertaken.

3.6 No standard could be expected to be universally applicable, however a plot ratio of up to 2:1 will normally be acceptable. In areas which derive their character from low intensity of building, a plot ratio lower than 2:1 will be expected; on the other hand plot ratios of up to 2.5:1 may be appropriate in areas of more intensive existing development. Over 2.5:1 may be justified only on townscape grounds.

3.7 This plot ratio assessment may also apply to extensions to existing buildings.

3.8 Guidance on the calculation of plot ratio is contained in the Planning Standards Chapter.

Sunlight and Daylight

3.9 Sunlight and daylight are valued elements in a good quality living and working environment. This is particularly the case in the Borough, where historic patterns of development have resulted in buildings often very close together. This helps to give the Borough its special character, but means less light within buildings and also within gardens and open spaces.

3.10 Badly designed developments can make adjoining properties and their gardens gloomy and unattractive. Where particular owners or occupiers will experience a loss of light as a result of a proposed development, this may be material to the consideration of the proposal. However, the aim of the Council's policies is to protect the quality of the area's environment generally, safeguarding those amenities which ought to be protected in the public interest.

2092



- 3.11** In considering development proposals the Council will not be seeking to ensure that they meet any particular minimum or maximum standard. Where proposals affect the light conditions in and around adjoining property, the extent to which it involves a significant and unreasonable worsening of light conditions for those properties will be assessed, taking account of the prevailing general standard of light in that local environment. Where existing buildings or spaces have poor light conditions, any worsening of light would only be justified on exceptional grounds. In some situations it will be appropriate to take the opportunity offered by development to achieve an improvement in light conditions where these presently fall below the standard generally prevailing in the area, or where it would otherwise be appropriate to do so. The 'good neighbourliness' of an existing property will also be relevant, for example some buildings are situated very close to the property boundary and would impose significant and unreasonable constraints on adjoining properties if standards were rigidly applied.
- 3.12** Within new developments, the Council will be seeking good light conditions, taking into account the general levels of light in the immediate area, and the character of its built form and spaces, as well as the fact that people generally look for better standards of light now than in the past.
- 3.13** These policy aims do not stand in isolation and must be weighed with other planning objectives. Conservation and design considerations will often justify closer spacing of buildings to protect the traditional character and close-knit urban fabric of the Borough.
- 3.14** The Council's policies will be relevant to most developments, to impact on existing residential and non-residential properties and sites, and to the light conditions within proposed residential development and non-residential development. In the case of non-residential development, existing and proposed, it will be necessary to assess whether the occupants have a reasonable expectation of a particular standard of daylight and/or sunlight. Schools, hospitals, hotels, and many small workshops and offices will usually benefit from good light conditions. Light, including sunlight, is also important to the enjoyment of gardens and open spaces, and these will normally be included in the assessment.
- CD28** NORMALLY TO RESIST DEVELOPMENT WHICH SIGNIFICANTLY REDUCES SUNLIGHT OR DAYLIGHT ENJOYED BY EXISTING ADJOINING BUILDINGS AND AMENITY SPACES.
- CD29** NORMALLY TO REQUIRE DEVELOPMENT TO BE DESIGNED TO ENSURE GOOD LIGHT CONDITIONS FOR ITS BUILDINGS AND SPACES.
- 3.15** In assessing developments, the Council will, where necessary, have regard to the guidelines in "Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice", published by the Building Research Establishment. A summary of the most relevant parts of the BRE guide is contained in the Planning Standards Chapter.

Privacy

2098



- 3.16** The Borough has the highest residential density in Great Britain, and where good standards of privacy exist, within buildings and open spaces, it is a highly valued amenity. In assessing development proposals the Council will seek to protect the existing privacy of residents and, where appropriate, the working population and to ensure good standards of privacy within new development. Buildings in the Borough, however, are often close together and some loss of privacy as a result of development may be unavoidable. Where particular owners or occupiers will experience a loss of privacy, this will be material to the consideration of the proposal. However the aim of the Council's policies is to safeguard those amenities which deserve to be protected in the public interest.
- 3.17** In considering development proposals the Council will not be seeking to ensure that they meet any particular minimum or maximum standard. Where proposals, including extensions to existing buildings, affect the privacy of adjoining property, the extent to which they involve a significant and unreasonable worsening of overlooking to those properties will be assessed, taking account of the prevailing general standards of privacy in that local environment.
- 3.18** In some situations it will be appropriate to take the opportunity offered by development to achieve an improvement in privacy conditions where these presently fall below the standard generally prevailing in the area, or where it would otherwise be appropriate to do so. The 'good neighbourliness' of an existing property will also be relevant, for example some buildings are situated very close to the property boundary and would impose significant and unreasonable constraints on adjoining properties if standards were rigidly applied.
- 3.19** Within new developments, the Council will be seeking good standards of privacy for future occupants, taking into account the general levels of privacy in the immediate area, and the character of its built form and spaces, as well as the fact that people generally look for better standards of privacy now than in the past. A distance of about 18 metres between opposite habitable room windows reduces inter-visibility to a degree acceptable to most people. This distance may be reduced if windows are at an angle to each other. A lesser distance is normally acceptable where windows face the public highway.
- 3.20** A common cause of loss of privacy, in the Borough is the construction of terraces or balconies above garden level. Where existing levels of privacy are good, development involving new, direct overlooking from a balcony or terrace into an adjoining habitable room window or private garden below should be avoided, especially at first floor level. Where residential accommodation already has access to a garden this will be taken into account in considering the proposal to add a balcony or terrace. Generally, the size, position and angle of view into adjoining properties and gardens will be taken into account, along with the existing levels of privacy.

2099



3.21 These policy aims do not stand in isolation and must be weighed with other planning objectives. Conservation and design considerations will often justify closer spacing of buildings to protect the traditional character and close-knit urban fabric of the Borough.

3.22 In the case of non-residential development, existing and proposed, it will be necessary to assess whether the proposed occupants have a reasonable expectation of a particular standard of privacy. Privacy, is also important to the enjoyment of gardens and open spaces, and these will normally be included in the assessment.

CD30 TO REQUIRE DEVELOPMENT TO BE DESIGNED TO ENSURE SUFFICIENT VISUAL PRIVACY OF RESIDENTS AND THE WORKING POPULATION.

3.23 Where appropriate the Council will attach conditions to planning permissions to ensure that developments do not significantly reduce the privacy enjoyed by adjoining properties. These include requiring the use of obscured glass, prohibitions on the insertion of windows in particular facades, requiring windows to be kept fixed shut, and the provision of planting boxes on terraces.

Views and Vistas

3.24 As well as the views and vistas highlighted below, the skylines and roofscape of large areas of the Royal Borough are sensitive to ill-considered change. Existing high buildings will not be considered as precedents. The Council's policies on views and vistas are contained in other sections of the Conservation and Development Chapter: that is Areas of Metropolitan Importance, Areas of Local Character and Conservation Areas and Listed Buildings.

3.25 In all these views and vistas, a building erected immediately to one side, or immediately behind the building can be as damaging to a view as a building built in front.

3.26 The Council will produce Supplementary Planning Guidance for those areas where skylines and vistas are important to the Borough's townscape and historic character.

High Buildings

CD31 TO RESIST A NEW HIGH BUILDING WHICH WOULD SIGNIFICANTLY EXCEED THE HEIGHT OF NEIGHBOURING BUILDINGS AND WHICH WOULD HARM THE SKYLINE.

5 CONSERVATION AREAS AND LISTED BUILDINGS



Conservation Areas

5.1 There are currently 35 conservation areas in the Borough, covering over 70% of its area. The Council will consider from time to time whether conservation areas should be extended or new areas designated. The programme of preparing proposals statements for all existing conservation areas will be completed and those in need of review will be updated.

5.2 A list of conservation areas and Conservation Area Proposals Statements appears in Appendix 1. Conservation areas are identified on Map 4 and also shown on the Proposals Map.

5.3 Each statement identifies the characteristics which contribute to the special nature of the conservation area and includes guidance which ensures its preservation or enhancement. Guidelines for the design of new building work (including extensions and alterations to existing properties), as well as proposals for enhancement work to be carried out by the Council itself, are also included. The preparation or review of Conservation Area Proposals Statements, and the enforcement or implementation of any proposals identified in them, will be carried out in consultation with local amenity groups.

5.4 The Statements will set out detailed guidance to interpret and elaborate on development control policies set out in the Plan. Such detailed guidance will be applied to all relevant planning applications.

CD48 TO PAY SPECIAL ATTENTION TO THE DESIRABILITY OF PRESERVING OR ENHANCING THE CHARACTER OR APPEARANCE OF EACH CONSERVATION AREA.

5.5 In many cases the character of an area depends not only on the fabric of existing buildings, but also on the ambience created by trees and gardens, walls and railings, external features and materials. The mix of land uses may contribute to the character of an area and in retail streets the design of shopfronts and signs are important.

CD49 TO ENCOURAGE AND CONTRIBUTE TO THE IMPROVEMENT OF THE ENVIRONMENT OF CONSERVATION AREAS.

CD50 TO SEEK THE IMPLEMENTATION OF SPECIFIC PROPOSALS WHICH HAVE BEEN AGREED IN CONSERVATION AREA PROPOSALS STATEMENTS AS RESOURCES PERMIT, AND IN CONSULTATION WITH AMENITY GROUPS, COMMERCIAL INTERESTS AND OTHER RELEVANT BODIES.