

# ST QUINTIN AND WOODLANDS NEIGHBOURHOOD PLAN

## CONSULTATION STATEMENT FEBRUARY 2014



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## **ST QUINTIN AND WOODLANDS NEIGHBOURHOOD PLAN CONSULTATION STATEMENT**

### **1.0 INTRODUCTION**

1.1 This document explains the processes of consultation and engagement used in the preparation of the St Quintin and Woodlands Neighbourhood Plan. It is one of a set of documents which accompany the Submission Version of the StQW Draft Plan, and which are required in order to meet the statutory Basic Conditions for a neighbourhood plan.

1.2 Copies of leaflets, flyers, slide sets and other material referred to in the text will be available for the independent Examiner of the StQW Draft Plan to inspect, at the time of Examination of the Draft Plan.

1.3 Neighbourhood Plans form part of the national planning system, and were introduced via the Localism Act 2011. These plans are drawn up by parish councils, or in non-parished areas by a Neighbourhood Forum. A Forum has first to be 'designated' by the local authority for the area concerned, before it has the powers to prepare a neighbourhood plan.

1.4 The St Quintin and Woodlands Neighbourhood Forum was designated by RB Kensington & Chelsea in July 2013. The initial thinking about the neighbourhood plan goes back further. The Forum grew out of the work of the St Helens Residents Association, set up in 2008 with the aim of maintaining and improving quality of life in the streets of the St Quintin Estate. This is an area made up predominantly of two-storey terraced Victorian and Edwardian housing, in North Kensington and bordering onto the eastern boundary of the borough of Hammersmith & Fulham.

1.5 The St Helens Residents Association swiftly found that its activities became dominated by issues of planning and development. As explained in the StQW Plan, this part of London is one experiencing the impact of huge pressures for development. The neighbourhood is surrounded by three of London's Opportunity Areas, where large-scale 'intensive development' and resultant high densities are encouraged by the policies of the Mayor of London and the London Plan.

1.6 With the publication of the Localism Bill in 2011, local residents began to take an interest in the potential of neighbourhood planning and those other aspects of the Bill that encouraged greater community involvement in planning. The idea of preparing a neighbourhood plan for the area was raised at the Association's open meetings in May 2011, and November 2011, while the Act was completing its passage through Parliament.

1.6 At the March 2012 management committee meeting of the St Helens Residents Association, it was agreed to put together an application for designation of a cross-borough neighbourhood area, entitled St Quintin and Woodlands and to consult locally on the proposed boundary. An initial leaflet was circulated to all households in the proposed area, and a meeting held with RBKC planning officers.

1.7. The application for designation was made at the end of April 2012. It covered proposals for the boundary of the StQW area, and for the establishment of a Neighbourhood Forum, within a single application. The St Helens Residents Association acted as the 'qualifying body' in making the application to the two councils involved, the association being a body with a constitution and membership which met the necessary criteria for a neighbourhood forum, as set out in the Localism Act.

1.8. Following the application, the two Borough Councils each published the relevant material on their websites and invited responses. This 6 week consultation period took place in June and July. This was at a time when the concept of neighbourhood planning was very new, and the idea of a cross-borough forum and plan was even newer. The 2012 Neighbourhood Planning Regulations had only recently been published, and there was some uncertainty on their interpretation.

1.9 During this 6 week public consultation period, the open meeting of the St Helens Residents Association received a presentation on neighbourhood planning. This explained the legislative background, identified some of the issues a Plan might cover, and summarised other similar initiatives across London

1.10 At the end of July 2012, consultation responses from RBKC residents and businesses were unanimously supportive of the designation proposals. Responses from Hammersmith and Fulham residents were evenly divided (13 in favour and 13 against). There followed a lengthy period when neither council made a decision on designation, with Hammersmith & Fulham Council seemingly reluctant to proceed.

1.11 Meanwhile the St Helens Residents Association continued with preparatory work for a neighbourhood plan. A small variation to the proposed southern boundary of the proposed StQW area was agreed with RBKC officers, following representations from the Westway Development Trust. The association's management committee in September 2012 noted that continuing correspondence with LBHF was producing no results.

1.12 At the Association's AGM in November 2012, a presentation was given on the history of Latimer Road and the prospects for its regeneration. This street, with its mix of housing and commercial use, forms part of the RBKC Freston Road/Latimer Road Employment Zone. Revival of the area, which had significant vacant office space at that time, was (and remains) one of the key issues for the Neighbourhood Plan.

1.13 Hammersmith & Fulham proposed a second round of consultation in early 2013, as a way forward in determining the designation application. The council subsequently dropped this proposal and proceeded with informal dialogue with a group based in Eynham Road which had recently constituted itself as the Brickfield Association of Residents.

1.14 By April 2013, RBKC officers had established with Communities and Local Government Department (CLG) that there was no obstacle to RB Kensington & Chelsea proceeding to designate its part of the proposed neighbourhood area, and to designate the StQW Forum. This process was duly completed, and the designation decisions were formally confirmed by the Council on July 2nd 2013.

1.15 The inaugural meeting of the St Quintin and Woodlands Neighbourhood Forum took place on June 27th 2013. 2,000 leaflets had been delivered to households and businesses, inviting people to the meeting. A management committee of 10 was elected, including 4 representatives from those parts of the StQW neighbourhood that lay beyond the original 'St Helens' area. Work on preparing the StQW Neighbourhood Plan could now begin in earnest.

1.16 Hammersmith & Fulham Council continued its dialogue with the Brickfield Association of Residents. In September 2013, without any further consultation with St Helens Residents Association or the newly established StQW Forum, the Council took a decision to 'amend' the proposed boundary of the originally proposed StQW neighbourhood and to establish a small and unnamed neighbourhood area within its own borough. At the same time, the Council also refused designation of the StQW Neighbourhood Forum and published the required Refusal Notice.

1.16 The St Helens Residents Association has subsequently questioned the lawfulness of these decisions, as falling outside the scope of the 2011 Localism Act and the 2012 Neighbourhood Planning Regulations. In practical terms, the coverage of the StQW Plan has been limited since September 2013 to the RBKC part of the originally proposed area. The StQW Forum has continued to try and involve and consult with LBHF residents, and has retained one LBHF resident on its management committee. The Draft Plan has been circulated to the Brickfield Association of Residents, and to Hammersmith and Fulham Council. Comments from LBHF have been taken into account in the Submission Version of the Draft Plan.

## **2.0 CONSULTATION AND ENGAGEMENT UNDERTAKEN BY THE StQW NEIGHBOURHOOD FORUM**

2.1 Following its establishment in July 2013 the new StQW management committee discussed the importance of community engagement and stakeholder involvement. Several basic principles were recognised:

*a) The idea behind Neighbourhood Plans is that they are community-led. The neighbourhood forum (through its Management Committee) will lead and co-ordinate the plan-making process.*

*b) Members of the Community (Stakeholders) will be actively involved in the plan-making process. In addition, it is important to engage the wider community, to gain from their knowledge and to seek their views.*

*c) Community engagement is necessary and important for several reasons:*

- Statutory Requirement - Planning legislation requires consultation and engagement to take place on plans, including on Neighbourhood Plans. When a completed Neighbourhood Plan is submitted for independent examination, it will have to be accompanied by a statement on community consultation and demonstrate that the legal requirements for consultation have been met.*
- Gaining Support - Early community engagement is essential in developing consensus, avoiding misconceptions and creating confidence in the process.*
- This is especially important for Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders, all of which are subject to a public referendum. The possibility of a 'no' vote is greatly reduced if people are aware of the plan, understand its scope and limitations and have had the opportunity to participate in its production. Good community engagement helps to create a sense of ownership by the public.*
- Understanding the Neighbourhood - Finding out what people think and drawing on their knowledge is an important part of developing the evidence base for an area. It is impossible to write policy for a community unless there is a strong level of understanding of that community.*
- Most importantly, more ideas/suggestions may come from residents to inform the brief, about what they want/ need/ could use, or what they may want to see etc, The incorporation of these may not only make the proposals more acceptable, but also more viable as they may be in answer to their needs or requirements, i.e. they will vote for them, appreciate them, use/take part in them.*

2.2. A structured approach to Community Engagement Strategy and Action Plan was agreed, involving a series of elements in the table below. The left hand column shows the present position, following the statutory pre-submission consultation on the Draft Plan:

Completed	<p><b>Publicise and raise awareness of the idea of preparing a StQW Neighbourhood Plan, and on its proposed boundary.</b></p> <p>Leaflets delivered to 2,000 households in June 2012 and June 2013. Material published on St Helens Residents website from 2012 and on StQW website from mid 2013. Posters in local shops and cafes. Consultation material on RBKC and LBHF websites. Some coverage in local press and national publications (e.g. Planning). Items on local RBKC micro-site <i>Notting Barns Live</i></p>
Completed	<p><b>Identify key local partners and stakeholders and develop working arrangements to gain their involvement and support</b></p> <p>Local stakeholders identified through previous work of St Helens Residents Association and contacts with local organisations. A list of organisations, agencies and businesses visited and consulted in the early stages of Plan preparation is at annex A. Ward councillors were also involved at this early stage.</p>
Completed	<p><b>Formulate and carry out an ongoing programme of community engagement</b></p> <p>'Drop-in' sessions held at West London Bowling Club and Brickfields Hall (in LBHF). Initial thinking was to hold a further series of Drop-in sessions on individual topics within the Plan. Such a session on Employment/Enterprise and Latimer Road was held in February 2014 and was well attended. Subsequently it has been found more helpful to hold open public meetings in St Helens Church hall. These avoid 'single-issue' discussion and enable residents and local shops/businesses to consider the relationship and trade-offs between different elements of the Plan, e.g. weighing the balance of priorities between housing, employment, and open space.</p> <p>A list of dates of the open meetings held by the Forum is as follows:</p> <ul style="list-style-type: none"> <li>• 27 June 2013 – Inaugural meeting</li> <li>• 12 September 2013 – Open meeting</li> <li>• 5th December 2013 - Open meeting</li> <li>• 27th March 2014 - Open meeting</li> <li>• 24th April 2014 - Open meeting</li> <li>• 29th May 2014 - Open meeting</li> <li>• 10th July 2014 - Open meeting</li> <li>• November 20th - Annual General Meeting</li> <li>• 5th February 2015 - Open meeting</li> </ul> <p>Open meetings of the Forum have taken place at St Helens Church hall, St Helens Gardens, at 8pm. Attendance has varied from 40 - 80 local residents and businesses. Four such meetings were held from March to July 2014, during the most intensive period of discussions and policy drafting for the Plan. The February 5th 2015 meeting followed the pre-submission consultation period, and agreed a number of changes to proposed StQW policies in the light of consultation responses (see below).</p>
Completed	<p><b>Identify main issues and themes to be included in the Plan, and clarify Objectives for each</b></p> <p>The primary exercise in identifying what local people felt about the StQW neighbourhood - what they wanted to change and what they wished to keep or</p>

	<p>improve - was the use of a Residents Survey. Hard copies were circulated to all 2,000 households and businesses in January 2014, and an online version published online. See below for details of the survey and of the responses received.</p>
Completed	<p><b><i>Draft Policy proposals for each Objective, in a form that is clear, legally robust, and can be applied by local authority development management/control staff.</i></b></p> <p>A first draft of the StQW plan was discussed with RBKC officers in June 2014. In this version, where proposed policies involved minor variations or neighbourhood-level interpretations, proposed StQW policies were drafted as variants of RBKC 2010 Core Strategy policies, showing proposed changes of wording. This applied particularly to Conservation policies, which are set out in unusual detail in the RBKC Core Strategy. RBKC officers advised against this approach, and asked that the StQW policies be drafted as 'stand-alone statements'. RBKC officers also identified a number of proposed policies that did not relate to planning or development matters. The Policy proposals in the Draft Plan were subsequently revised, and now include sections on 'Actions' (non-planning matters). A 'Reasoned justification' has been added beneath each proposed policy.</p>
Completed	<p><b><i>Carry out a 'healthcheck' of the StQW Draft Plan, to ensure compliance with the Basic Conditions for neighbourhood plans</i></b></p> <p>A health check of the November 2014 version of the Draft Plan was organised via the NPIERS service. This piece of work was undertaken by Christopher Lockhart-Mummery QC, and his report can be found at the StQW website.</p> <p>A number of changes were made to the Draft plan in the light of these comments and the Forum is grateful for the advice and recommendations of Mr Lockhart-Mummery. His advice has also assisted the Forum in developing its views on a number of legal issues on which RBKC officers have taken a different view of the statutory framework for neighbourhood plans.</p>
Completed	<p><b><i>Consult on the draft plan, informally and via a statutory 6 week 'Pre-Submission' Consultation</i></b></p> <p>The first full version of the StQW Draft plan was published online on the StQW website in June 2014, and news to this effect was communicated in that month's newsletter. A revised version of the Plan (amended after initial discussion with RBKC) was published online in July 2014. Reminders of the availability of the document were included in the July, August and September newsletters.</p> <p>In October 2014, RBKC planning officers sent to the StQW Forum a set of detailed comments, making clear that the Council did not agree with a number of the policy proposals in the then version of the Draft Plan. Responses were sent to the Council on all of these comments, and some amendments were made to the Draft Plan.</p> <p>The statutory 'Section 14' pre-submission consultation on the StQW Draft Plan took place between December 1st 2014 and January 24th 2015. An 8 week rather than 6 week period was set, in order to allow for the Christmas and New Year break. A four page leaflet, explaining the 12 proposed policies in the Plan was distributed to all 1,700 households in the RBKC part of the StQW neighbourhood (it having been established by then that the 300 households in the LBHF part of the originally proposed neighbourhood would not have the opportunity to participate).</p> <p>Letters were sent to the registered owners of all business premises in the Latimer Road part of the designated neighbourhood. Landowners of the three 'backland' areas for land proposed for Local Green Space designation were also contacted.</p>

Completed	<p><b>Take account of consultation responses on the Section 14 public consultation, prior to submitting a revised version of the Draft Neighbourhood Plan to the local authority</b></p> <p>Consultation responses received during the 8 week pre-submission consultation are set out in the Consultation Annexe to this statement. The left hand column sets the comments received (in full unless otherwise stated) and alongside are shown the responses from the Forum's management committee. The initial section of the Annexe shows comments covering multiple sections of the Draft Plan. Other comments are shown under the relevant policy heading.</p> <p>RBKC officers provided a further set of detailed comments on the pre-submission version of the Draft Plan. While a number of these have been taken on board in the Submission Version, many have not. This is because the Forum and RBKC planning officers have some fundamental differences of view on the statutory framework for neighbourhood plans and on interpretation of relevant sections of the National Planning Policy Framework and of CLG Planning Practice Guidance.</p>
Completed	<p><b>Provide feedback at all stages</b></p> <p>The main vehicle for providing feedback has been a monthly StQW newsletter, circulated to all members on the SHRA/StQW mailing list (360 in all). Copies can be found at <a href="http://www.stqw.org">www.stqw.org</a> under About/Newsletters. 14 editions of the newsletter have been published and circulated to date.</p> <p>The StQW website has also been regularly updated. The full results of the 100+ resident survey responses (anonymised) were collated and have been available on the website as from April 2014. This enables any local residents/business to assess the same results as have been available to the Forum's management committee.</p> <p>Feedback has also been given to local residents and businesses at the open meetings of the Forum. This has allowed proposed policies to be refined, as the process of preparing the Draft Plan has continued.</p>

### **3.0 THE StQW RESIDENTS SURVEY**

3.1 This was a major exercise for the Forum's management committee, and much time was spent in designing and agreeing the survey format and the questions to be asked. The outcome is attached as Annex B.

3.2 Within London, the willingness and appetite of the public to spend time responding to questionnaires and surveys is always an issue. There may be many consultation exercises going on at any one time, and this has proved the case in the StQW area with a series of consultations initiated by the Mayor of London (two on the Old Oak and Park Royal Development Corporation), by Transport for London (2 on options for an Overground connection at old Oak and on the East West Cycle SuperHighway), and by RBKC (Enterprise Issues and Options, partial Review of Core Strategy on Conservation and Design, basements, and Miscellaneous Matters).

In an area of development pressures, individual developers have also been holding exhibitions and workshops, and circulating associated leaflets and flyers, as part of preparation of the their own Statements of Community Involvement (QPR, CarGiant, Imperial College, St James, Stanhope/BBC, Westfield, London Realty). Hence the risks of 'consultation fatigue' are high.

3.3. 2,000 copies of the StQW survey were delivered to residential and business addresses in January 2014, and we were pleased to have over 100 responses returned (online and in hard copy). This was a 5% response rate (or more like 6.2% of the 1,700 RBKC households, since there were very few responses from the LBHF non-designated area) This response rate compares favourably to those achieved by RBKC, for example, when consulting on neighbourhood-based Supplementary Planning Documents such as in the 2014 exercise for the Notting Hill Gate.

3.4 The Survey was a 8 page A4 questionnaire, with a brief explanation of neighbourhood planning and a map of the designated area. Questions were asked under the headings below. Homes

- Transport
- Shopping
- Parks
- Healthcare
- Education
- Conservation
- Development

3.5 Care was taken over the wording of the questions, so as to ensure that these were 'open'. Respondents were also asked to give basic information on themselves, such as how long they had lived in the area, whether they drove a car, and where they shopped. This helped in the assessment of responses. An open question asking in what ways the area could be improved was also included.

3.6 As with any planning survey/questionnaire of this kind, it is likely that responses received will be skewed towards those who a) know the area fairly well and b) take an interest in its future. The StQW area attracts young families, and while its has its share of rented accommodation it is not a transient or 'bed-sit' part of London. The StQW management committee therefore felt that the survey responses , while only a 5% sample, gave a good representative view from those with a stake in the neighbourhood and should therefore be given serious weight in developing policy proposals within the Plan.

3.7 A collated version of all survey responses, excluding personal data, was published on the StQW website in March 2014.

### **4.0 DROP IN SESSION ON LATIMER ROAD AND RELATED EMPLOYMENT AND HOUSING ISSUES**

4.1 This session was held at Unit 8 Latimer Road (one of the light industrial workshops) and ran from 1400 to 1900 hours. The aim was to attract businesses in the street, as well as residents. Invitations were

circulated to all residents and business addresses in the street, and the event was publicised to the wider neighbourhood via the StQW newsletter. 40 people attended during the course of the session.

4.2. Exhibition material included a scale model of Latimer Road showing building heights of surrounding development (on the LBHF side of the nearby boundary). There were also drawings illustrating how the light industrial unit might be converted or redeveloped, on an incremental basis. A slide show on a rolling loop provided information on Latimer Road in the past (as a busy mixed use housing and commercial street in the early 1900s, with its own railway station on what is now the West London Line) along with issues for the future.

4.3 The key issues raised in discussions were:

- the various reasons why Latimer Road fails to attract new occupiers for the vacant commercial and office floorspace at the southern end of the street (lack of cafes and other amenities, poor links to public transport, security problems, outdated accommodation)
- the extent to which market rents had dropped since the start of the 2007 recession, and were well below those achieved in the Freston Road part of the Freston Road/Latimer Road Employment Zone, at £15-20 per sq ft.
- the potential impact of the proposed pedestrian/cycle underpass to Wood Lane
- the threat of competition from new business floorspace at Imperial West and along Wood Lane
- the impact on building heights of the approved Imperial West development (Phase 1 only being completed at this time) and the extent to which increased heights on the western side would of Latimer Road would in future be acceptable..
- rising house prices in the street, as *'one of the last streets in W10 to be discovered'*.

A StQW newsletter was circulated after the drop-in session. Coupled with the StQW Survey responses and the presentation and discussion on Latimer Road at the AGM of the St Helens Residents Association in November 2012, this drop in session provided the StQW management committee with a good feel for local views on how best Latimer Road should be revived and regenerated as part of the StQW Neighbourhood Plan.

## 5.0 ONGOING CONSULTATION WITH KEY AGENCIES AND PUBLIC BODIES DURING PLAN PREPARATION

4.1 The StQW management committee has kept in close touch with **RBKC** officers and ward councillors, during the preparation of the Plan. The electoral wards within the StQW area changed at the time of the 2014 local elections, with the formation of a new Dalgarno ward and a new St Helens Ward. Three of the four ward councillors elected in May 2012 are new, with the fourth having been on the Council previously. All four councillors who took up office in May 2014 have had briefings on progress of the Draft Plan and are frequent attendees at the open meetings of the Forum.

4.2 The **St Quintin Health Centre**, which accommodates two GP practices, is the main health facility within the StQW neighbourhood. St Charles Hospital, which now includes a Centre for Health and Wellbeing) lies just outside the neighbourhood boundary. The Forum has regularly contacted **the NHS West London Clinical Commissioning Group** for news on proposals for sale and development of the St Quintin Health Centre site, and the future of the two GP practices. The site features in section 8 of the Draft Plan on Managing Development. Response from the CCG has been that their planning process remain ongoing.

4.3 Discussions and correspondence with **LB Hammersmith & Fulham** planning officers during 2013 and early 2014 focused mainly on the council's very slow response to the original designation application, and the manner in which this application was finally determined 15 months later (see above). The council has subsequently made comments on an early draft of the Plan and on the pre-submission version, which have been addressed.

4.4 There has been contact with the one local **primary school** in the neighbourhood (Oxford Gardens) and the Forum has worked with the school over an unsuccessful planning application for the neighbouring development site in Crowthorne Road. The Draft Plan supports mixed use development on this site, provided scale, height and mass respect the presence of the school and other neighbouring buildings.

4.5 The **Westway Trust** (formerly Westway Development Trust) are an important stakeholder in the area. The Trust has leased and managed the land beneath the Westway since 1971, since the construction of this elevated section of motorway. A small part of the southern section of the StQW area is on land managed by the Westway. This section was included because of its significance to StQW residents as a key cycle and pedestrian route, once the planned underpass from Imperial West to Latimer Road is completed.

A re-alignment of the southern boundary of the StQW area was agreed as part of the RBKC designation, to make clear that the main parts of the Sports Centre were excluded from the StQW area.

4.6 The **Westway Trust** has made significant management changes in recent years. Relationships with the St Helens Residents Association and the StQW Forum have improved as a result, albeit that many residents of the StQW neighbourhood have reservations about the aggressive commercial approach that the Trust has taken to the land that it manages, and in particular to the leasing of sites for outdoor advertising towers (see section 3 of the StQW Draft Plan). The Trust has since come forward with proposals to mitigate the impact of the main tower, in collaboration with its advertising contractor JC Decaux, but these proposals have yet to received planning permission. The Trust has meanwhile made objections to proposed StQW Policy 5b, which affects land that is managed by the Trust (while ultimately owned by Transport for London).

4.7 No comments from the Mayor of London, or Transport for London were received during the 8 week pre-submission consultation on the StQW Draft Plan. Meanwhile the Mayor of London and TfL have given the go ahead to the East West Cycle SuperHighway. Further detailed consultation on the Westway section of this proposed dedicated route may follow. The Forum has explained that the proposed Policy 5b is designed to safeguard part of the undeveloped land at 301 Latimer Road for a cycle lift, in conjunction with the SuperHighway and would not prevent the Trust from submitting planning applications for other uses should TfL and RBKC not wish to pursue such a proposition.

4.8 The **Dalgarno Trust** is an active and sizable charitable body, based in the area immediately north of the StQW neighbourhood. The Trust runs a number of projects, locally and in the wider area. It also acts as the body administering the £6,800 CLG/Locality grant to the StQW Forum, and this support has been much appreciated.

4.8 The Forum has liaised with **Transport for London** on the two main transport issues in the Draft Plan. On the first of these (traffic delays at the North Pole junction into Wood Lane) the issue is not readily amenable to planning policies and hence this features as an 'action' in the Draft Plan. TfL engineers have come to visit the site, and have reviewed the phasing of the traffic lights. On the second issue (the proposition for an additional London Overground station at 'Western Circus') the Forum continues to lobby and to work with other organisations (West London Line Group, Grand Union Alliance) via current TfL consultations on Overground options for the Old Oak area, and the passage of the HS2 Bill in Parliament. The proposed use of the site at 301 Latimer Road for a cycle lift in conjunction with the planned East West Cycle SuperHighway is covered above.

## **5.0 CONSULTATION WITH LANDOWNERS**

5.1 The Forum has used its best endeavours to communicate with owners of business premises in Latimer Road, and with owners of vacant shop premises in the two parades at North Pole Road and St Helens Gardens. The Land Registry has been used to find ownership details. Responses to date have been fairly limited and there is a recognised problem of the borough of properties being owned by absentee landlords or by companies registered offshore.

5.6 One of the St Quintin backland sites is owned by West Bowling Club Ltd, in Highlever Road. The Forum approached the Club and Directors of the company in 2013, and Forum members have since played an active part in reviving the fortunes and finances of the Club. With the consent of the company, an application was made to place the land and premises on the RBKC Community Asset Register. This was approved by the Council in February 2014.

5.7 The Forum has consulted direct with the owner of the St Quintin Garage in Highlever Road, a further and smaller development site referred to in Section 8 of the Draft Plan.

5.8 The Forum contacted the owners of land at Nursery Lane (tenanted since the 1960s by Clifton Nurseries) in late 2013, and has since communicated with estate agents and planning consultants acting for these owners (see Section 4 and Annexe C of the Draft Plan).

## **6.0 DEVELOPING OBJECTIVES AND POLICIES FOR THE StQW DRAFT PLAN**

6.1 During mid 2014, work by the management committee was combined with a series of open meetings at St Helens Church Hall. Presentations and discussions at these meetings were used to test out the policy proposals in the StQW Draft Plan. Minutes of these meetings were published on the StQW websites, and monthly newsletters in a more user-friendly format were circulated to all members of the StQW Forum/St Helens Residents Association.

6.2 Membership grew during this period, from approx 260 to 360, partly from those who had received and responded to the StQW Residents Survey, and partly from neighbours hearing of proposals for the Draft Plan.

6.3 The series of open meetings held in mid 2014 considered different elements of the Draft Plan as detailed below. Attendance ranged from 40 to 60 residents and businesses, including ward councillors. For a public consultation meeting, in a London context where people lead very busy lives, the fact that these attendance levels were sustained over several months was reassuring to the management committee.

- The March 27th open meeting had a presentation on **transport issues** in the Draft Plan. These included ideas for an additional Overground station on the West London Line, to alleviate worsening traffic congestion on Scrubs Lane/Wood Lane. RBKC had a longstanding policy commitment to press for a replacement station at North Pole Road. The Forum's management committee was now suggesting an alternative location, beneath the Westway roundabout and linked to the proposed pedestrian/cycle underpass. The pros and cons of the underpass were also aired, and a hand vote taken showing majority (but far from universal) support to this project. Bus and cycle routes were discussed, and a report back given on the Latimer Road drop-in session.
- The April 24th open meeting went through all the various proposals for variations to RBKC **conservation policies**, as had been identified by the management committee and a sub-group of local architects. Votes were taken on the issues, to test levels of support in each case. Where proposals achieved a clear majority, relevant proposals were worked up in more detail for the Draft Plan. Where opinions were divided, ideas were not taken further. The Forum's April newsletter recorded the outcome of the meeting, as was circulated to all members.
- The May 29th open meeting considered **open space** and **housing** issues, particularly in relation to the news that the Nursery Lane site (Clifton Nurseries) was being marketed as a potential opportunity site for residential development. The meeting considered the planning history and possible future use of this site, and the kind of development proposals that might come forward. Many residents in the area had understood that the land was protected by a restrictive covenant, as is the case for the neighbouring backland at West London Bowling Club. The meeting was briefed on the designation of Local Green Space introduced via the 2014 National Planning Policy Framework.

This discussion was followed by a presentation on the 12 'objectives' for the Draft Plan, as had been developed by the StQW management committee, and these were supported as a good framework for covering the range of issues that had surfaced through the Residents Survey and earlier meetings.

- The July 10th open meeting returned to the subject of **objectives and policy proposals** for the Draft Plan. A first full draft of the plan had been published on the StQW website, and had also been discussed with RBKC officers. Following this discussion, the earlier policy proposals had been re-formatted and a 'reasoned justification' added to each. 'Policies' had also been separated from 'actions' which referred to issues not strictly related to planning and development, and which need to be treated separately in a neighbourhood plan. Copies of the revised version of the proposed policies were laid on all seats round the room, for residents to take away and digest. A presentation was given covering each of the 12 sets of policy proposals in turn and explaining what the Draft Plan would say on each.
- At the Forum's AGM on November 20th, the meeting was reminded of the 12 objectives that had been developed and agreed for the Draft Plan. It was explained again that the policies proposed in relation to these policies formed the core of the Plan, and were the 'statutory part of the Plan on which local people would be invited to vote at a referendum. Drafts of a 4 page consultation leaflet, due to be circulated at the start of the consultation process, were laid on seats at the meeting and comments/edits were invited.

## **7.0 PRE-SUBMISSION 8 WEEK CONSULTATION (AS REQUIRED BY SECTION 14)**

7.1. It was decided to hold this consultation over the December/January period, allowing an extra two weeks for the Christmas/New Year break, rather than delaying this exercise into 2015. The earlier timetable for plan preparation had slipped during August to October, while the Forum's management committee had awaited feedback from RBKC officers. A further factor for avoiding delay was that the Forum's grant of £6,800 from Locality/CLG had to be spent by December 31st, after which the Forum would have no further funds to meet printing costs or room hire.

7.2 The 4 page consultation leaflets were delivered to the 1,700 households in the StQW area. The registered owners of business premises in Latimer Road were written to, alerting them to the consultation. The Forum also contacted the following consultees, as required for the purpose of Section 14 on neighbourhood plans.

- The Mayor of London
- Transport for London
- English Heritage
- Thames Water Authority
- NHS West London Clinical Commissioning Group
- LB Hammersmith & Fulham
- Metropolitan Police (Local Policing Team)

Other local agencies consulted were

- Action for Disability Kensington & Chelsea
- Westway Trust
- Dalgarno Neighbourhood Trust

7.3 RB Kensington & Chelsea was also asked to provide a consultation response and on 23rd January sent to the StQW Forum a further set of comments. Once again these comments questioned the inclusion of the most significant policy proposals within the Draft Plan, and also proposed a significant number of additions and deletions to the text of the document.

7.4 These RBKC comments, and the Forum's response to each of them, form a separate annexe to this consultation paper. This material has not been included in the main 'Consultation Annexe' of comments from the public and other consultees. This is because the Forum considers the RBKC Planning Department to have some basic misapprehensions about the statutory framework for neighbourhood planning, and the role of the local authority within this framework.

7.5 The Forum was also very disappointed that the Council had not taken on board the legal advice of Christopher Lockhart-Mummery QC, in his 'health-check' report on an earlier draft of the StQW Plan. On issues of Basic Conditions and 'general conformity' the StQW Forum has preferred to proceed on the basis of his legal advice, as compared with statements asserted by RBKC planning officers.

7.6 A total of 90 respondents submitted comments during the Section 14 consultation on the StQW Draft Plan. These comments are set out in the Consultation Annexe to this Statement. The resultant action by the Forum in amending the Submission Version of the Draft Plan is noted alongside, where such action was sought and deemed necessary.

7.7 The Management Committee is grateful for the time and trouble that local residents and businesses have gone to, in responding to the Draft Plan.

7.8 At the same time that the StQW Forum was consulting on the Draft Plan, the Council was carrying out a consultation on a Partial Review of the 'Enterprise' chapter of its 2010 Core Strategy (now re-based as the Local Plan). This part of the Local plan has significant relevance from StQW policies for Latimer Road. The Forum, and a number of businesses and residents in Latimer Road responded to this RBKC consultation. There were 11 responses (out of 29) which referred to Latimer Road and these can be seen on the RBKC website at this link.

<https://planningconsult.rbkc.gov.uk/consult.ti/EnterpriseIO/consultationHome>

7.9 The Forum considers the direction of proposed StQW policies for Latimer Road to be consistent with the responses made to this RBKC consultation exercise.

## **8.0 FINAL CONSULTATION MEETING PRIOR TO FINALISING THE SUBMISSION VERSION OF THE StQW PLAN**

8.1 An open meeting of the Forum was held on February 5th, to provide feedback on the pre-submission consultation and to refine proposals in the Draft Plan in the light of consultation responses. Four issues were discussed, two minor.

### **St Quintin backland sites and the land at Nursery Lane**

8.2 The meeting was informed that RBKC had advised in its latest comments that the policy statement in the 1990 Oxford Gardens Conservation Area Proposals Statement (CAPS), making clear that housing development would not be allowed on any of the three remaining backland sites, now carried 'very limited' material weight. This appeared to be the result of changes in the national planning system, rather than any decision by RBKC elected members.

8.3 On this basis, the meeting voted by a large majority (5 against) to add an additional policy to Section 4 of the StQW Draft Plan. The draft wording (as shown to the meeting on a slide) was: ***"Housing development on the three remaining original backlands of the St Quintin Estate (land north of Nursery Lane, land off Kelfield Gardens and land off Highlever Road) will not be permitted."*** This repeats, almost exactly, the wording of the 'policy statement' in the Oxford Gardens CAPS.

8.4 It is clear, from the comments received during the StQW consultation exercise, that many local people feel that this longstanding policy commitment by RBKC should be honoured and continued. It was explained to the meeting that the StQW Draft Plan provided the means to achieve this outcome,

and to restore 'material weight' to such a policy as and when the Council comes to consider planning applications for all three backland sites.

### **StQW policies for Latimer Road**

8.5 The meeting noted that there had been a handful of objections from residents living in Latimer Road (and one from Eynham Road) on StQW Draft Policy 8e. This proposed that building heights on the western side of Latimer Road should be allowed to increase, to a 'maximum' guideline of 14m

8.6 Objections were on the grounds that taller buildings on the western side of the road would impact on views, sunlight and daylight. There were also concerns that an increase of housing units in Latimer Road, on upper floors of redevelopments on the sites of Units 1-14, would add to pressures on residents parking.

8.7 It was noted that additional housing in Latimer Road would be 'permit-free' under RBKC policies, so would not add to on-street parking demand. It was also noted that many respondents to the StQW consultation have supported Latimer Road as a good location (the Draft Plan) proposing 40-60 housing units as a likely number to be achieved through incremental redevelopment of Units 1-14, with a further number achieved through the proposed StQW Policy to allow residential use of upper floors of existing office buildings.

8.8 A presentation was made, with slides showing how individual light industrial/warehouse units could be redeveloped with housing on upper floors. Following discussion on the acceptability of increased building heights on the western side of the road, an alternative wording for StQW Policy was agreed unanimously by the meeting. For the Submission Version of the StQW Draft Plan, this would read:

***In order to restore the original urban form of the street, to allow increased building heights on the western side of Latimer Road subject to:***

- i) Consideration of heights of nearby buildings which range from four storey at the southern end to two storey at the northern end, and taking account of building heights in LBHF***
- ii) Meeting RBKC and national requirements on standards of daylight, sunlight, and visual privacy for occupants of new development and for occupants of existing properties affected by development***
- iii) No harmful increase in the sense of enclosure to existing buildings and spaces and neighbouring gardens***

### **9.0 CONCLUSION**

9.1 The management committee of the StQW Forum considers that the level of engagement and involvement of residents and businesses in the development of the StQW Draft Plan has been higher than initially expected. In central London, it is a reality that populations are mobile, usually living and working in different parts of the city and often feeling no strong sense of attachment to their neighbourhood or local community.

9.2 The process of drawing together a neighbourhood plan, building on the work of the St Helens Residents Association, has brought people together. It has encouraged many people to learn about the planning system. Importantly, the open meetings of the Forum have allowed people to weigh up choices for the future, and to assess the potential impact of development within and beyond the StQW area.

9.3. It might be argued that the StQW Forum has taken few steps designed specifically to involve young people in the preparation of the neighbourhood plan. The sad fact is that there are now relatively few young people able to rent, or to buy accommodation in this part of North Kensington. The StQW Draft Plan attempts to do what it can to remedy this situation by proposing additional housing in Latimer Road, rather than on a site such as Nursery Lane which appeals to the development market for high end luxury homes.

9.3 The balance between the need to protect employment space, bring more vitality back to Latimer Road and local shopping parades, provide additional housing, and conserve the best features of this part of the Oxford Gardens Conservation area are at the heart of the StQW Draft Plan. The management committee considers that the consultation and engagement processes carried out in developing the Plan, over a 2 year period have been well focused and proportionate to the task.

St Quintin and Woodlands Management Committee  
February 2015