

St Quintin and Woodlands Draft Neighbourhood Plan - Consultation Comments

From 1. Keeping Life Local to Policy 2c – Conservation and Design

Name	1. Keeping Life Local	Policy 1a - Keeping Life Local	Actions 1 - Keeping Life Local	2. Conservation and Design	Policy 2a - Conservation and Design	Policy 2b - Conservation and Design
Harborne						
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)						
Environment Agency (Simon Banks)						
Kathleen Harvey						
ARC Associates (J Allen)						
Marine Management Organisation (Susan Davidson)						
Clare Singleton						
C.W.F. Children Worldwide Fashion (Oliver Mouglin)						
National Grid (Laura Kelly)						
Highways England (Anup Shrestha)						
Health and Safety Executive (John Moran)						
Andrea Williams						
J A Nasser		Agree	Agree			
Lynn Horsford		I strongly support this proposal.	I strongly support this proposal.			
Clive Loveless						
Thomas Newman		Support	Support		Support	
Jennie Marshall						
Molly Bell						

Rowan Someville						
Kurti		I support this wholeheartedly	Good to see needs of pedestrians being considered			
Audrey Jones						
Peter & Sue Warren						
Prue O'Day						
Stephen & Josie Waley-Cohen						
J Compojer						
Hilary Baikie						
Ruth Hilary						
Naomi Sorkin	I am very much in support of this application and have been from the very beginning. This plan would enhance the quality of life for everyone in the area.	Yes i agree	I agree		I agree	I agree
The Hammersmith Society (Rosemary Pettit)						
Barry & Carol Dodd						
Sue Pritchett						
Edward Gretton						
Ian Butchoff						
Michael E Jones						
Mizzi Studios (Tania Martin)						
Savills (Simon Myles)						
Nigel Whitbread						
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)						
West London Bowling Club (Emma Henderson)						

Mr Ehrman						
Woofie Ltd (Tanya Sarne)						
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	1 0.1.18 The OPDC is committed to ensure that the communities in and around its area benefit from the opportunities generated by the transformation of the area and impacts are mitigated. It looks forward to continued engagement with the St Quintin and Woodlands Draft Neighbourhood Forum. N/A			2 0.2.3 For accuracy, wording should reflect that within the OPDC area, there are two Opportunity Areas: · Old Oak Common Opportunity Area; and · Park Royal Opportunity Area Amend text to state: "The Old Oak Common & Park Royal Opportunity Areas, immediately..."		
Rolfe Judd (John Osborn)						
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)						
Susan Wilson Gretton						
Doreen Pickard						
Amnah Shafi						
Matthew & Elizabeth Shaw						
CGMs Consulting (John Mumby)				<p>The Development Plan</p> <p>The Development Plan for the Royal Borough of Kensington and Chelsea comprises the London Plan 2015, saved policies in the RBKC Unitary Development Plan (UDP) and the Core Strategy 2010. The Norland Neighbourhood Plan was made on the 10th March 2014, however is not relevant to the StQW Neighbourhood Forum area.</p> <p>The RBKC Proposals Map identifies the site as within a Conservation Area, with no other designations. At page 441 of the Core Strategy, the site is identified as 'Garden Squares and other Green Spaces', however not as an area of bio-diversity importance. It is not included in the London Conservation Services' Borough Ecological Survey of 2002, nor classified as open space in the Council's Open Space Audit of 2004.</p> <p>Notable elements of the draft NP refer to the Oxford Gardens Conservation Area Proposals Statement (CAPS) as justification for policies. It is noted that the CAPS is very old, dating from 1990. Whilst there are references to Policy / Policies in the CAPS, none of these have these have been through public consultation or examined independently, as required by the current Local Plan process. They should not therefore be taken forward as sound basis for the preparation of a Neighbourhood Plan, which would become part of the Development Plan for the area.</p> <p>In addition, the Council are seeking to produce Conservation Area Appraisals for the Borough's Conservation Areas, indeed have done so for a number of areas already. It is intended to produce an Appraisal for the Oxford Gardens Conservation Area which would mean the existing CAPS document becomes obsolete. The StQW Neighbourhood Forum is aware of this fact.</p> <p>The continued insistence to base justification for NP policies against the existing CAPS is therefore questioned on both of the above points.</p>		

West London Bowling Club Co Ltd (James Tocher)						
Natural England, (Sally Harries)						
Transport for London (Tom Jolley)						
Ian Sneddon						
RBKC (Patricia Cuervo)				<p>The Council as a Lead Local Flood Authority (LLFA) welcomes the opportunity to comment in the draft neighbourhood plan. The LLFA's comments are provided without prejudice to comments of any current or future planning application located within the neighbourhood area.</p> <p>Responding to neighbourhood plans and planning applications within the Counters Creek catchment area (including White City and Old Oak and Park Royal) are two of the actions identified in our Local Flood Risk Management Strategy. These relate to objective 5 ("Undertake a review of policies to ensure flood risk is fully addressed") and 3 ("Reduce flood risk and its consequences"). The Strategy is a wide-ranging document which sets out how the Council will deliver an integrated approach across various different departments, other flood risk authorities, government bodies and agencies, neighbouring boroughs, residents and businesses to manage flood risk in a holistic way.</p> <p>This response will address the specific flooding issues and policies in the draft plan and will also provide comments on the Sustainability Appraisal.</p> <p>The Flooding issues and policies are included in sections 2: Conservation and 3: Environment.</p>		
RBKC (Joanna Hammond)	<p>The Council appreciates the huge effort that the Neighbourhood Forum have put into producing this plan, few of the Council's comments should be a surprise to the Forum since the Council's concerns have been discussed with them as the plan has developed.</p> <p>0.1.9 There are three shopping parades</p> <p>0.1.23 The Council understands why the Forum wishes to include the actions with the policies in the plan, but recommends that the policies are also shown in a separate summary at the front of the plan for ease of reference by planning officers, preferably with page references to the supporting text.</p> <p>0.1.27 Change a 'maximum of 10-15 years' to 'to cover a maximum 15 year time period'.</p> <p>0.2.2 There are now 38 Opportunity Areas in the London Plan.</p> <p>0.2.7 Kensal Canalside not Kensal Rise Opportunity Area.</p> <p>0.2.15 The Council's evidence does not support the view that there is a lack of interest in office floorspace.</p> <p>0.2.16 There are three local shopping parades in the Neighbourhood Area.</p> <p>0.4.8 The Council suggests the second sentence is changed to 'The Council's screening opinion</p>			<p>2.0.4 The Council brought forward the Oxford Gardens Conservation Area Appraisal (CAA) in order to provide the evidence base needed to support the changes to conservation policies. This is has been drafted and is ready to go to consultation but was put on hold at the request of the Forum. The Council does not consider there is any conflict with the NPPF guidance as claimed because the CAA is guidance and does not contain policies as the text goes on to explain.</p> <p>The Council requests the text is amended: 'Officers undertook preparatory work in November 2014 on the draft Oxford Garden Conservation Area Assessment and then agreed to suspend consultation on the new draft Conservation Area Assessment until the neighbourhood plan underwent examination, at the request of the Neighbourhood Forum. The sentence starting 'This is in line with NPPF guidance...' could be removed.</p> <p>2.0.5 The Council requests this text is amended to: • To provide policies specific to the house types in the StQW neighbourhood</p> <p>2.0.6 The Council requests '(if successful at referendum) will have the force of policy in terms of the material weight they carry' is removed and 'will be used to make planning decisions in the area' is added.</p>	<p>People may not understand what a London / Butterfly roof is so it may be useful to provide a definition or direct them to the Conservation Area Appraisal, which will include a roofscape map, in paragraph 2.3.5.</p>	

	concluding that a full SEA was not necessary was agreed by the three statutory consultees: Historic England; Natural England and the Environment Agency.			<p>2.4.1 This text should include a reference to action point (ii)</p> <p>2.5.1 The statement 'In practice, there is little evidence of this policy being applied or enforced in the StQW area, where front garden works are frequently carried out without a planning application' reads as an unhelpful invitation to disregard strategic policy, the Council requests it is removed.</p> <p>2.5.2 Policy 2d not Policy 2e relates to hard surfacing</p> <p>2.6.1 Policies 2e and 2f are new policies for the neighbourhood area, so the Council recommends the text is changed to read: 'StQW Draft Policies 2e and 2f provide specific polices for the area.</p>		
London Borough of Hammersmith and Fulham (Trevor Harvey)						
The Kensington Society (Amanda Frame)						
Historic England (David English)						
Alan Rivers						
David Marshall						
Judy Fox Antiques (Judy Fox)						

Conservation and Design (Policy 2d- Policy 2h)

Name	Policy 2c - Conservation and Design	Policy 2d - Conservation and Design	Policy 2e - Conservation and Design	Policy 2f - Conservation and Design
Harborne				
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)				
Environment Agency (Simon Banks)				
Kathleen Harvey				
ARC Associates (J Allen)				
Marine Management Organisation (Susan Davidson)				

Clare Singleton				
C.W.F. Children Worldwide Fashion (Oliver Mougin)				
National Grid (Laura Kelly)				
Highways England (Anup Shrestha)				
Health and Safety Executive (John Moran)				
Andrea Williams				
J A Nasser				Agree
Lynn Horsford		I strongly support this proposal.		I strongly support this proposal.
Clive Loveless				
Thomas Newman	Support		Support	
Jennie Marshall				
Molly Bell				
Rowan Someville				
Kurti		I support this wholeheartedly		Rights of Light is a very important consideration
Audrey Jones				
Peter & Sue Warren				
Prue O'Day				
Stephen & Josie Waley- Cohen				
J Compojer				
Hilary Baikie				
Ruth Hilary				

Naomi Sorkin	I agree	Yes	I agree	I agree
The Hammersmith Society (Rosemary Pettit)				
Barry & Carol Dodd				
Sue Pritchett				
Edward Gretton				
Ian Butchoff				
Michael E Jones				
Mizzi Studios (Tania Martin)				
Savills (Simon Myles)				
Nigel Whitbread				
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)			<p>1. The Council has previously questioned whether StQW Policy 2e (relaxing the RBKC requirement for 'subordination' or a small setback in a rear/side extension) might create harm to the Oxford Gardens Conservation Area</p> <p>An appeal against the Council's refusal of an application for an extension and basement at 30 Highlever Road was allowed on 30 June 2015. One of the RBKC grounds for refusal was 'The extension fails to read as a separate later addition thus failing to respect the original form and appearance of both the closet wing and property. This is caused by the failure to recess the extension back from the building line of the closet wing and from continuing the glazing from the closet wing across to the infill extension'. The planning inspector concluded 'As a result of its low height and simple form, the proposed extension would read as a subservient addition to the host building and would not significantly detract from its form or appearance'. The Council acknowledges that its conservation policies are 'non-strategic'. Hence questions of general conformity do not apply in this instance.</p> <p>The StQW Forum is confident that StQW Draft Policy 2e will not cause harm in terms of the local authority's duties under S72 of the Planning (Listed Buildings and Conservation Areas Act) 1990. The Forum supports the recent decision of the Planning Inspectorate, not to require 'subordination' within the elevation of a rear/side extension (as RBKC has on occasion demanded on houses within the StQW Neighbourhood under the terms of Core Strategy Policy CL9</p>	
West London Bowling Club (Emma Henderson)				
Mr Ehrman				

Woofie Ltd (Tanya Sarne)				
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...				
Rolfe Judd (John Osborn)				
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)				
Susan Wilson Gretton				
Doreen Pickard				
Amnah Shafi				
Matthew & Elizabeth Shaw				
CGMs Consulting (John Mumby)				
West London Bowling Club Co Ltd (James Tocher)				
Natural England, (Sally Harries)				
Transport for London (Tom Jolley)				
Ian Sneddon				

RBKC (Patricia Cuervo)		<p>Section 2: Conservation Draft Policy 2d refers to resisting impermeable surfaces in front gardens areas other than for the replacement of existing main paths or where approved hard standing for parking and crossovers are already in place. Although the aim of the policy is in line with the Council's policy CE2 (f) as explained in paragraph 2.5.1, there is a risk that the policy's implementation may lead to missed opportunities to increase permeability in front gardens. The examples given in the policy (main paths, hard standing for parking and crossovers) can all be retrofitted with permeable or semi-permeable materials which will increase overall permeability. This is not relevant to original historic fabric (such as tiles). To reflect this, the policy should be reworded as follows:</p> <p>Policy 2d) to resist the introduction of non-permeable surfaces in front garden areas (above the limits within Permitted Development rights) and replace existing impermeable areas using permeable materials when possible.</p> <p>Please note that in the text policy 2d is wrongly named as policy 2e (paragraphs, 2.5.2, reasoned justification and paragraph 3.5.5).</p>		
RBKC (Joanna Hammond)	<p>Permitted Development Rooflights normally constitute development permitted through the GPDO 2015, so without an Article 4 Direction to remove this right they do not require planning permission, even in a conservation area.</p> <p>The Council appreciates the aim is to clarify the current position with regard to rooflights on front roofslopes but this policy represents no change from the current Article 4, which removed permitted development rights.</p>	<p>RBKC Policy CE 2 (f) Flooding resists impermeable surfaces in front gardens. The Council is concerned that this policy represents a weakening of this strategic policy because it would remove the opportunity to negotiate replacement of existing non-permeable hard standing with a permeable surface as part of development proposals.</p> <p>The Council accepts that it would not be desirable to replace the very attractive tiled front paths that are characteristic of the area but requests the policy is amended as shown: To resist the introduction of non-permeable surfaces to front garden areas (above size limits within Permitted Development rights) other than for the replacement of existing main paths or where approved hard standing for parking, and where crossovers is already in place.</p> <p>As the Neighbourhood Plan notes in paragraphs 3.5.1 to 3.5.5 and 6.1.7 this area is subject to flooding and it is important that all possible opportunities to increase sustainable urban drainage are seized. The Council recommends that this policy is moved to Chapter 3 alongside the relevant text on</p>	<p>The Council considers the effect of this policy on the conservation area would be at least neutral.</p> <p>Reasoned justification the Council requests the word 'updated' is removed – this is the Council's policy - and references to how previous UDP policies were interpreted as this is now irrelevant. Proposed text: Reasoned justification: there is a requirement in the updated RBKC Policy CL9 for rear extensions and modifications to existing buildings to be 'subordinate to the original building to allow the form of the original building to be clearly understood, and to reinforce the character and integrity of the original building , or group of buildings'. The UDP version of a similar policy has until recently been applied to planning applications for rear extensions in the Oxford gardens CA. This can lead to with case officers requiring a small (100mm) set back in the rear facade at the line of the original side passage to the house, the practical consequence of which is to prevent the use of full width sliding doors. The RBKC policy is seen by local residents as an unnecessary and inappropriate restriction in a neighbourhood where the rear ground floor facades of dwellings are not visible from public viewpoints, nor from shared garden squares, and are in any event of modest historical and architectural merit. Varying this policy in respect of the StQW part of the Oxford Gardens CA Policy 2e is seen by the StQW Forum as having no material impact on the character of the conservation area.</p>	<p>An extension of up to 3m at the eaves within the side passage is development permitted through the GPDO 2015, outside a Conservation Area. Within the conservation area all side passage extensions require planning permission irrespective of their height.</p> <p>In addition there is an Article 4 in place for Oxford Gardens / St Quintin Conservation Area (specified numbers in Highlever Road, Kingsbridge Road, Kelfield Road, Balliol Road, Finstock Road, St Helens Gardens, Wallingford Avenue, St Quintin Avenue, Oxford Gardens) that prevents alterations, improvements and extensions to any part of those elevations of a dwelling house which front onto a highway.</p> <p>The Council considers the effect of this policy on the conservation area would be at least neutral.</p> <p>Rights of Light is a legal matter that sits outside the ambit of the Town and Country Planning Act, it may be advisable to remove reference to Rights of Light from the policy, and add an explanation the reasoned justification or the plan text.</p>

		<p>flooding.</p> <p>The reasoned justification is unhelpful in suggesting that the policy is not enforced, which could be taken as an invitation to ignore the policy, although this is unlikely to be the plan's intention, and therefore the Council suggests this is removed.</p> <p>The Council has given a separate response on this policy as the Lead Local Flood Authority.</p>		
London Borough of Hammersmith and Fulham (Trevor Harvey)				
The Kensington Society (Amanda Frame)				
Historic England (David English)				
Alan Rivers				
David Marshall				
Judy Fox Antiques (Judy Fox)				

Conservation and Design (Policy 2g to Action 2)

Name	Policy 2g - Conservation and Design	Policy 2h - Conservation and Design	Actions 2- Conservation and Design
Harborne			
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)			
Environment Agency (Simon Banks)			
Kathleen Harvey			
ARC Associates (J Allen)			
Marine Management Organisation (Susan Davidson)			
Clare Singleton			

C.W.F. Children Worldwide Fashion (Oliver Mouglin)			
National Grid (Laura Kelly)			
Highways England (Anup Shrestha)			
Health and Safety Executive (John Moran)			
Andrea Williams			
J A Nasser	Partially Agree. I see no reason for maximum 12 sq m	Agree	
Lynn Horsford	I strongly support this proposal.		I strongly support this proposal.
Clive Loveless			Keep as conservation area.. ban heavy development and basements
Thomas Newman	Support	Support	Support
Jennie Marshall			
Molly Bell			
Rowan Someville			
Kurti		This encourages awareness of the attractive uniformity of the conservation area	
Audrey Jones			
Peter & Sue Warren			
Prue O'Day			
Stephen & Josie Waley-Cohen			
J Complojer			
Hilary Baikie			
Ruth Hilary			
Naomi Sorkin			

The Hammersmith Society (Rosemary Pettit)			
Barry & Carol Dodd			
Sue Pritchett			
Edward Gretton			
Ian Butchoff			
Michael E Jones			
Mizzi Studios (Tania Martin)			
Savills (Simon Myles)			
Nigel Whitbread			
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)			
West London Bowling Club (Emma Henderson)			
Mr Ehrman			
Woofie Ltd (Tanya Sarne)			
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...			
Rolfe Judd (John Osborn)			
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)			
Susan Wilson Gretton			
Doreen Pickard			
Amnah Shafi			
Matthew & Elizabeth Shaw			

CGMs Consulting (John Mumby)			
West London Bowling Club Co Ltd (James Tocher)			
Natural England, (Sally Harries)			
Transport for London (Tom Jolley)		<p>3. Cycling In terms of cycling, the Neighbourhood Plan could also address cycle movement through and within the area overall and seek to provide a clear network of routes within the area to serve residents and visitors.</p> <p>There is a mention in paragraph 6.1.1 of a pedestrian/cycle route that people don't feel safe using, proposals could be made in the Neighbourhood Plan for this site and similar ones to address this issue.</p> <p>Paragraph 6.1.6 mentions the negative impacts of filling front gardens with cycle and bin stores. The Plan could aim to tackle this issue by putting forward positive proposals, for example encouraging a coordinated approach to such stores between neighbours, guidance on well designed stores and associated landscaping. On street cycle stores set within a quality urban realm could also be considered.</p> <p>We would be pleased to discuss with you further how links between the neighbourhood and the SuperHighway could be improved. However cycle lifts raise both funding and operational issues.</p>	
Ian Sneddon			
RBKC (Patricia Cuervo)	<p>Draft Policy 2g limits rear garden outbuildings to a maximum coverage of 12sq m. This could have a positive impact by reducing the amount of impermeable surfaces introduced in natural gardens. The reasoned justification could reflect the fact that the Council's Policy CE2e requires sustainable drainage in all development, including small development to reduce the speed and volume of surface water run-off which is discharged into the combined sewer system. The following sentence could be added at the end of the reasoned justification paragraph:</p> <p>Outbuildings can also have a detrimental impact on flood risk by introducing impermeable surfaces and reducing the capacity of the garden to drain surface water naturally. This policy needs to be read alongside the Council's Policy CE2 (e) which requires sustainable drainage in all development, including outbuildings.</p>		
RBKC (Joanna Hammond)	<p>A response on this policy is given separately by the Council as the Lead Local Flood Authority. 2.8.1 Article 4 Directions cannot be required by Neighbourhood Plans.</p>	Gas meter boxes do not require planning permission.	<p>2(ii) The Council is only able to take enforcement action if it is made aware of an infringement so it would be more effective for this action point to be altered as suggested below: STQW to inform To urge RBKC to take prompt enforcement action on of any infringement of Permitted Development rights in respect of front boundary walls.</p>
London Borough of Hammersmith and Fulham (Trevor Harvey)			

The Kensington Society (Amanda Frame)			
Historic England (David English)			
Alan Rivers			
David Marshall			
Judy Fox Antiques (Judy Fox)			

3. Environment

Name	3. Environment	Policy 3a - Environment	Policy 3b - Environment	Policy 3c - Environment	Policy 3d - Environment	Actions 3- Environment
Harborne						
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)						
Environment Agency (Simon Banks)	<p>Thank you for consulting the Environment Agency on the Draft Neighbourhood Plan for St Quintin and Woodlands.</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage.</p>					
Kathleen Harvey						
ARC Associates (J Allen)						
Marine Management Organisation (Susan Davidson)						
Clare Singleton						

C.W.F. Children Worldwide Fashion (Oliver Mouglin)						
National Grid (Laura Kelly)						
Highways England (Anup Shrestha)						
Health and Safety Executive (John Moran)						
Andrea Williams						
J A Nasser		Agree	Agree	Agree	Agree	Agree
Lynn Horsford		I strongly support this proposal.	I strongly support this proposal.	I strongly support this proposal.	I strongly support this proposal.	
Clive Loveless		Please keep as is				
Thomas Newman		Support	Support	Support	Support	Support
Jennie Marshall						
Molly Bell						
Rowan Someville						
Kurti				Huge advertising towers are a real blot on the landscape, and should never have been positioned so that they shine into residents' bedroom windows	An enclosed rear garden is a feature which enhances both the pleasure of living in a property which has one, and the value of the property.	3ii. Westway Trust needs to be rigorously pursued over the advertising towers and to acknowledge the distress caused by them to residents.
Audrey Jones						
Peter & Sue Warren						
Prue O'Day						
Stephen & Josie Waley-Cohen						
J Complojer						
Hilary Baikie						
Ruth Hilary						

Naomi Sorkin						
The Hammersmith Society (Rosemary Pettit)						
Barry & Carol Dodd						
Sue Pritchett						
Edward Gretton						
Ian Butchoff						
Michael E Jones						
Mizzi Studios (Tania Martin)						
Savills (Simon Myles)						
Nigel Whitbread						
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)						
West London Bowling Club (Emma Henderson)						
Mr Ehrman						
Woofie Ltd (Tanya Sarne)						
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	<p>3 0.2.4 For clarification, London Plan (2015) table A1.1 identifies Old Oak to "support high density development which could include a cluster of tall buildings around the interchange". This is supplemented by the draft Old Oak and Park Royal Opportunity Area Planning Framework guidance section OO4 (a)(iv) which states that the buildings at the proposed Old Oak Common Station and local vicinity will be "tall" and "should be carefully articulated and heights must be varied in order to avoid being read as a singular mass. Careful consideration will need to be given to how massing and heights transition between different locations." Text should be amended to accurately reflect London Plan policy and emerging guidance set out in the draft Old Oak and Park Royal OAPF with regard to tall buildings in Old Oak</p>					

Rolfe Judd (John Osborn)	Environmental quality: draft policy StQW 3:	3a) where development impacts on the character and appearance of the Oxford Gardens Conservation area, to require that proposals reflect and respond to the distinctive character of the St. Quintin Estate in terms of the ratio of existing building heights to street and pavement widths	3b) where development impacts on views and vistas within and from the StQW neighbourhood, to resist proposals which cause harm to, or fail to preserve or enhance, the character of the StQW part of the Oxford Gardens Conservation area.		3d) to require that new development creates no harmful increase to the sense of enclosure of rear gardens of houses within the StQW part of the Oxford Gardens conservation area.	Response: The Policy should reference the wording of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in preserving or enhancing the character or appearance of the area. In seeking to introduce its own version of Conservation Area policy, the Neighbourhood Plan fails to have regard to national policy. Furthermore, there is no clarity as to what "no harmful increase to the sense of enclosure" actually means. The Policy fails to have regard to national policy and should be deleted as it does not meet the basic conditions.
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)						
Susan Wilson Gretton						
Doreen Pickard						
Amnah Shafi						
Matthew & Elizabeth Shaw						
CGMs Consulting (John Mumby)						
West London Bowling Club Co Ltd (James Tocher)						
Natural England, (Sally Harries)						<p>Thank you for your consultation dated 4th June 2015. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England generally welcomes the draft neighbourhood plan and has limited comments below. Opportunities for enhancing the natural environment Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.</p> <p>We are pleased that the value of the street trees, especially those which provide a large canopy, has been recognised both for the benefits they provide to people in terms of improving air quality and supporting climate change adaptation and their value in supporting biodiversity.</p> <p>The recognition of the value of local greenspace is welcomed. Managing these sites with wildlife in mind could enable the sites to contribute to London's BAP priority species which include stag beetles, bats and house sparrows. Consideration should be given to maintaining and enhancing links to the larger open</p>

						<p>spaces of Wormwood Scrubs. Overall the aim should be provide net gains for biodiversity in accordance with NPPF para 109. Green spaces along with other elements such as permeable hard surfaces and green roofs also help to reduce surface water run-off and associated localised flooding.</p> <p>Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.</p> <p>Protected species You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England.</p>
Transport for London (Tom Jolley)						
Ian Sneddon						

RBKC (Patricia Cuervo)	<p>Section 3: Environment</p> <p>The paragraphs which explain risk of flooding are very informative and thorough. However, they could benefit from a reorganisation and some rewording to increase clarity. The following changes are proposed:</p> <ul style="list-style-type: none"> • Move paragraph 3.5.4 after paragraph 3.5.1 and keep the same order for the remaining paragraphs. • Add at the end of the original paragraph 3.5.4: "This overall loss of green space has had a negative impact in the natural drainage capacity of the catchment. This could have a knock on effect increasing the amount and speed of surface water run-off which reaches the combined sewer system". • Add at the end of paragraph 3.5.3: "if planning permission is granted by the London Borough of Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea". <p>Sections 7-10</p> <p>These sections include policies to increase flexibility regarding change of use within parts of the Neighbourhood Area. As the neighbourhood falls within the North Kensington Critical Drainage Area, the change of use to a more vulnerable use in flood risk terms (as per table 2 of the Planning Practice Guidance – Flood Risk Vulnerability Classification) should be appraised. This is to ensure that the development and its occupiers will remain safe during a flooding event and that flood risk is not increased within the development or elsewhere. Reference to the need of this appraisal should be included in the policies.</p>					<p>Sustainability Appraisal</p> <p>The following comments relate only to the relation of some policies and objectives and SA objective 6 (to reduce the risk of flooding to current and future residents). When the relation included in the appraisal is agreed, comments are not provided.</p> <ul style="list-style-type: none"> • Policy 4: Open space. It is important to note that lack of development does not necessary mean that flood risk is addressed and reduced. Current Council and London Plan policies ask for a considerable reduction of surface water run-off when a development is proposed. • Secion 6: Safety and Tranquility appears not to have been assessed. • Policies 7 to 10: as per our previous comments, the change of use to a more vulnerable use in flood risk terms (as per table 2 of the Planning Practice Guidance – Flood Risk Vulnerability Classification) could lead to an increase in flood risk. This should be appraised properly.
RBKC (Joanna Hammond)	<p>3.5.4 This text explains why it is important that the requested change to policy 2d is made, and why this policy should be moved to chapter 3.</p> <p>3.5.5 The policy on non-permeable surfaces is 2(d) not 2 (e).</p>					
London Borough of Hammersmith and Fulham (Trevor Harvey)						
The Kensington Society (Amanda Frame)						
Historic England (David English)						
Alan Rivers						
David Marshall						
Judy Fox Antiques (Judy Fox)						

4 Open Space (4 to Policy 4b)

Name	4. Open Spaces	Policy 4a - Open Spaces	Policy 4b - Open Spaces
Harborne			In addition the originally intended backland sites of Highlever/Kingsbridge/Wallingford - now St Quintins Family Centre and Blake Close- now housing- should be restricted from any further development or intensification of use.
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)			
Environment Agency (Simon Banks)			
Kathleen Harvey			
ARC Associates (J Allen)			
Marine Management Organisation (Susan Davidson)			
Clare Singleton			
C.W.F. Children Worldwide Fashion (Oliver Mouglin)			
National Grid (Laura Kelly)			
Highways England (Anup Shrestha)			
Health and Safety Executive (John Moran)			
Andrea Williams			
J A Nasser			
Lynn Horsford		I strongly support this proposal.	I strongly support this proposal.
Clive Loveless			

Thomas Newman		Strongly support	Strongly support
Jennie Marshall			This is to strongly support the St Quintin and Woodlands neighbourhood plan and to emphasise my support of new paragraphs 4b and 4c, the proposal to designate the St Quintin backlands as Local Green Space, so that these green lungs can be protected for the benefit of local people and the environment and so that they cannot be exploited by developers.
Molly Bell	I am writing to say that I oppose the development by builders of the green space on nursery lane. I tried to oppose the plan and support the Save our Green Spaces on the RBKC website but was unable to do so. This city needs its green spaces for our physical and mental health and we mustn't give in to builders who care little of the community but only of making money. Thanks for your kind consideration of my opinion.		
Rowan Someville			
Kurti		These local and easily accessible green spaces add considerable enjoyment to living in this area.	Brownfield sites should be used. You cannot bring back the natural environment and its species once it has been lost.
Audrey Jones			I fully support the policies outlined in the St.QW Draft plan including new policies 4b and 4c.
Peter & Sue Warren			
Prue O'Day	I wanted to let you know that the policies in the StQW Draft Plan including the new policies 4b and 4c have my full support and I look forward to it being accepted and implemented.		
Stephen & Josie Waley-Cohen			
J Compojer			
Hilary Baikie			
Ruth Hilary			
Naomi Sorkin			
The Hammersmith Society (Rosemary Pettit)			
Barry & Carol Dodd	this email is to say that we support the policies in the StQW Draft Plan including the new policies 4b and 4c.		
Sue Pritchett			
Edward Gretton			

Ian Butchoff			
Michael E Jones			
Mizzi Studios (Tania Martin)			
Savills (Simon Myles)			
Nigel Whitbread			
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)		<p>2. Does StQW Policy 4a proposing designation of land at Nursery Lane as Local Green Space meet criteria set out at paragraph 77 of the NPPF? A planning application PP/15/02798 to build 20 four bedroom houses at Nursery Lane was submitted by Metropolis Property on May 4th 2015. Public consultation on this application has resulted in further views and information on this piece of land being submitted to RBKC, by residents and by the applicants. This material is relevant to the NPPF criteria for LGS and in particular whether this piece of land is demonstrably special to a local community and holds a particular local significance. As of July 15th it is understood that the developers have withdrawn application PP/15/02798. Consultation responses to the application from Metropolis Property can be seen at this link to the RBKC website. There were some 90 objections to the application. A legal opinion from Matthew Horton QC was obtained by the Nursery Gardens Action Group and is relevant to the examination of StQW Draft Policies 4a and 4c. A copy can be found here, and the document is also attached to this submission.</p>	<p>3. Is StQW Policy 4b resisting housing development on the remaining St Quintin backlands in 'general conformity' with the RBKC Core Strategy/Local Plan and does it have sufficient regard to the NPPF? Recent court cases have established that NP site allocation policies are material considerations to be balanced against the NPPF Paragraph 14 presumption of sustainable development. NPPF Paragraph 17 states that development should</p> <ul style="list-style-type: none"> • contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; • encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; <p>Neighbourhood Plan policies are required to 'have regard' to the NPPF and to 'generally' The examiner of the StQW Draft Plan will need to take a view on this issue. The Forum considers Draft StQW Policy 4b to have regard to Paragraph 17 of the NPPF ('core planning principles'). The 1990 Oxford Gardens CAPS document (which remains on the RBKC website as an extant Council view on the St Quintin backlands) is clear that the remaining backland open spaces should not be developed for housing. RBKC has stated that this 'policy' no longer carries any significant material weight, as a result of changes in the planning regime. The StQW Forum maintains that StQW Draft Policy 4b is clearly in 'general conformity' with a series of RBKC Core Strategy/Local Plan policies as listed at Para 11.10 of the StQW Basic Conditions Statement.</p>
West London Bowling Club (Emma Henderson)			I support the adoption of the draft St Quintin and Woodlands Neighbourhood Plan, in particular the new policies 4b and 4c. These protect the backlands in the St Quintin area from being developed (confirming the policies in the Oxford Conservation Policy of RBKC).
Mr Ehrman			
Woofie Ltd (Tanya Sarne)			
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	<p>4 0.2.4 map For accuracy, the aerial map of the OPDC boundary as shown in the draft OAPF Old Oak and Park Royal OAPF should be depicted in the document. A map accompanies this appendix for use. Replace existing aerial map of the OPDC area with map shown in the draft OAPF.</p>		

<p>Rolfe Judd (John Osborn)</p>		<p>1. Local Green Space – Draft Policy StQW 4(a) Draft Policy StQW 4 has not changed since the Consultation Draft and states the following: 4a) Reflecting their origins as communal sports and recreation areas, to protect from inappropriate development the remaining 'backland' private open spaces in the neighbourhood, by designating as Local Green Space (under paragraph 77 of the National Planning Policy Framework) the following pieces of land: · Land north of Nursery Lane, behind Brewster Gardens, Dalgarno Gardens, and Highlever Road (our underline) · Land behind Kelfield Gardens, Wallingford Avenue, and St Quintin Avenue · Land behind Highlever Road, Pangbourne Avenue, and Barlby Road (WLBC site) Response: Paragraph 76 states that local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. Paragraph 77 states that Local Green Space designation will not be appropriate for most green areas or open space. This is a fundamental point. The designation should only be used: · where the green space is in reasonably close proximity to the community it serves; · where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and · where the green area concerned is local in character and is not an extensive tract of land.</p>	<p>2. Local Green Space - Draft Policy StQW 4(b) 4b) In the context of a neighbourhood plan which allocates alternative sites for housing use, housing development on the three remaining original backlands of the St Quintin Estate will not be permitted (these being): · Land north of Nursery Lane, behind Brewster Gardens, Dalgarno Gardens, and Highlever Road. · Land behind Kelfield Gardens, Wallingford Avenue, and St Quintin Avenue · Land behind Highlever Road, Pangbourne Avenue, and Barlby Road (WLBC site) Response: The reasoned justification for this policy includes reference to the outdated Oxford Gardens CAPS, and as set out in detail earlier in this representation, this outdated policy cannot reasonably be relied upon in the formation of new policy. This is also the view of the Council. The policy justification also contends that the sites are 'greenfield' sites, which in the case of Nursery Lane in particular, is simply not the case. All of the evidence above demonstrates this. A site visit, or indeed, a cursory glimpse of the site, demonstrates this. Furthermore it is noted that there is no planning definition of 'greenfield' land. Given the use of the site and for the reasons previously given, the site has the characteristics of 'previously developed land'. Given its characteristics, the site should form part one of the Neighbourhood Plans designated housing areas, as it is available, and importantly, having regard to the NPPF, the development of housing on this site is deliverable and developable now – preventing a rare opportunity for sustainable development in this part of London. Having regard to the NPPF, sustainable development should go ahead, without delay - and not be lost to a Neighbourhood Plan which is simply attempting to use any means, regardless of national and local policy, to prevent sustainable development. In this way, the Neighbourhood Plan does not meet the basic conditions as fails to have regard to National Policy.</p>
<p>RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)</p>			
<p>Susan Wilson Gretton</p>			
<p>Doreen Pickard</p>	<p>I am in full support of the StQW Draft Neighbourhood Plan. In particular I support the preservation of the open spaces in the neighbourhood and believe that the existing backland sites should be protected by receiving designation as Local Green Space.</p>		
<p>Amnah Shafi</p>			
<p>Matthew & Elizabeth Shaw</p>			

<p>CGMs Consulting (John Mumby)</p>	<p>Before reviewing the policies in detail, it is worth commenting on a few points in the general text of the document which require addressing.</p> <p>Firstly, Map 1 of the draft NP identified the Nursery Lane site as an Existing Green Space / Recreational Facilities. This is not the case. The Map appears to bunch together these two types of uses and should be separated in the draft NP. It is misleading as it suggests that open spaces provide recreational opportunities, which is not necessarily the case. Private open spaces do not necessarily provide such opportunities. Certainly, Nursery Lane is not a recreational opportunity, it is private commercial land. It is recommended that these two designations are split.</p> <p>Para 4.1.6 refers to the 'Council's Conservation Area Policy Statements'. For the area, the Council have the Oxford Gardens Conservation Area Proposals (my emphasis) Statement (CAPS). The wording needs to be correct here, to ensure that readers of the draft NP do not</p> <p>Draft Policy StQW 4 – Sub section 4a</p> <p>The policy proposes the designation of the Nursery Lane (Clifton Nurseries) site as Local Green Space (LGS). Annexe C of the draft Plan goes into considerable detail about why the Clifton Nurseries site should be allocated as LGS. A review is thus made on the background to the designation, the relevant 'tests' and the relevance of the information contained within the Annexe.</p>	<p>Guidance / Policy Background</p> <p>The draft Plan seeks to allocate the Clifton Nurseries site as LGS. The draft Plan correctly identifies the Frameworks' reference to designation of land as LGS within paragraphs 76 and 77.</p> <p>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.</p> <p>77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> · where the green space is in reasonably close proximity to the community it serves; · where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and · where the green area concerned is local in character and is not an extensive tract of land. <p>It is clear from the wording of paragraph 77 that the designation needs to comply with all of the bullet points as an 'and' criteria, not an 'or' criteria. Consequently, they all apply and all must be met. In addition, the Framework states that a Local Green Space designation will not be appropriate for most green areas or open space. The NPPG notes: 'Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.'</p> <p>and</p> <p>'Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.'</p> <p>and</p> <p>'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making'.</p> <p>In summary, any land proposed to be designated as LGS will need to be demonstrably special to the local community and would not prejudice the preparation of plan making for an area. The Framework notes that a LGS designation will not be appropriate for most green areas or open space and thus it is clear that there is a high threshold for such an allocation and land being simply a green area or open space does not necessarily mean that a LGS designation is warranted.</p>	<p>Background to Neighbourhood Planning</p> <p>Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) sets out that a Plan must meet the 'Basic Condition' which include:</p> <p>(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, (d)the making of the order contributes to the achievement of sustainable development, (e)the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>Concerning Neighbourhood Plans, Paragraph 185 of the National Planning Policy Framework (the Framework) notes 'Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.' and continues, 'Neighbourhood plans should reflect these (strategic) policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.'</p> <p>Draft Policy StQW 4 – Sub section 4b</p> <p>The wording of this policy is questioned. If the Examiner of the draft NP believes the Clifton Nurseries site justifies a designation as LGS then there is no requirement to include a policy stating that housing development would not be permitted. A policy regarding the prevention of 'inappropriate development' in line with paras 87- 89 of the Framework would be sufficient.</p> <p>If however, the LGS nomination fails, the policy does not accord with the basic conditions as it seeks to specifically restrict a certain type of use, indeed one which the Development Plan seeks the provision of to meet an identified need. The justification is weak, relying on out of date Conservation Area Proposals Document which does not, as set out above, meet the required tests to be deemed to form part of the Development Plan for the area. It prevents sustainable development and does not have regard to national policy.</p>
<p>West London Bowling Club Co Ltd (James Tocher)</p>	<p>We support the policies contained in the StQW Draft Plan including the new policies 4b and 4c</p>		
<p>Natural England, (Sally Harries)</p>			
<p>Transport for London (Tom Jolley)</p>			
<p>Ian Sneddon</p>			
<p>RBKC (Patricia Cuervo)</p>			

RBKC (Joanna Hammond)	4.1.11 If the CAPS policy is being quoted it should be quoted in full i.e. 'Some leisure and recreational activities have made good use of these spaces and proposals to develop them for housing will not be permitted.' 4.1.12 Policy CR5 relates to private open space where the space gives visual amenity to the public.		
London Borough of Hammersmith and Fulham (Trevor Harvey)			
The Kensington Society (Amanda Frame)			
Historic England (David English)			
Alan Rivers	I am writing to confirm my support for the proposed Draft Plan including Policies 4b and 4 c I am absolutely against any more development in this area on greenfield sites including all the St Quinten backlands Including the Nursery Lane site . I have already objected to such development		
David Marshall			
Judy Fox Antiques (Judy Fox)			

4. Open Space (4c to 4d)

Name	Policy 4c - Open Spaces	Policy 4d - Open Spaces
Harborne		
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)		
Environment Agency (Simon Banks)		
Kathleen Harvey		
ARC Associates (J Allen)		

Marine Management Organisation (Susan Davidson)		
Clare Singleton		
C.W.F. Children Worldwide Fashion (Oliver Mouglin)		
National Grid (Laura Kelly)		
Highways England (Anup Shrestha)		
Health and Safety Executive (John Moran)		
Andrea Williams		
J A Nasser	Agree	Agree
Lynn Horsford	I strongly support this proposal.	I strongly support this proposal.
Clive Loveless		Please conserve
Thomas Newman	Support	Support
Jennie Marshall		
Molly Bell		
Rowan Someville		
Kurti		Mature trees are a crucial link with the past, and add elegance to the landscape.
Audrey Jones	I fully support the policies outlined in the St.QW Draft plan including new policies 4b and 4c.	
Peter & Sue Warren		
Prue O'Day		
Stephen & Josie Waley-Cohen		

J Compojer		
Hilary Baikie		
Ruth Hilary		
Naomi Sorkin		
The Hammersmith Society (Rosemary Pettit)		
Barry & Carol Dodd		
Sue Pritchett		
Edward Gretton		
Ian Butchoff		
Michael E Jones		
Mizzi Studios (Tania Martin)		
Savills (Simon Myles)		
Nigel Whitbread		

<p>St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)</p>	<p>4. Is StQW Policy 4c, resisting housing development on land not previously developed and falling within the neighbourhood area/Oxford Gardens CA, in 'general conformity' with the RBKC Local Plan/Core Strategy and does it have sufficient regard for the NPPF?</p> <p>Policy 4c is dependent on the question of whether the site at Nursery Lane is Previously Developed Land, in terms of the NPPF definition. The applicants for a housing development (since withdrawn) claim that the site 'has strong characteristics of previously developed land'. The StQW Forum is clear that there have been no buildings or structures on the site which fall within the NPPF definition of development. The June 2015 legal opinion from Matthew Horton QC, as submitted to RBKC as part of objections to the current planning application for Nursery Lane, states 'I agree that the site does not fully satisfy the definition of PDL. It must follow that it is not PDL as defined. Consequently Rolfe Judd's opinion that the site 'accords with paragraphs 17 and 111 of the NPPF is incorrect ' (para 17xxiv of legal opinion).</p> <p>Since the StQW Draft Plan was submitted, the Forum has had access (under Fol) to pre-application advice provided by RBKC to the applicants for a development at Nursery Lane.</p> <p>The StQW Forum considers that proposed policy 4c has full regard to the NPPF, and in particular to paragraph 17.</p> <p>In a context where alternative housing sites are proposed in a NP, following evaluation of options, proposed StQW Policy 4c is seen by the StQW Forum as an appropriate exercise in the allocation of land uses. The policy ensures that sustainable development within the neighbourhood is 'plan-led' through a plan which has been 'positively prepared' in accordance with the NPPF.</p> <p>StQW Policy 4c is also considered by the StQW Forum to be in 'general conformity' with a series of RBKC Core Strategy/Local Plan policies (see para 11.10 of StQW Basic Conditions Statement).</p> <p>If StQW Policy 4c is accepted at examination as part of the Draft Plan, the question of whether or not the Nursery Lane site is PDL will be tested on the facts as and when any planning application is determined.</p>	
<p>West London Bowling Club (Emma Henderson)</p>	<p>As a member of the Management committee and the community which is running the West London Bowling Club, it is very important that backlands, of which the club is one, are protected from development. These spaces were designed as an integral part of the plans of the St Quintin estate. In the case of the bowling club and Nursery Lane, the sites were laid out before many of the houses around them were built. St Quintin's design would be considered visionary today. The spaces provide 'green lungs' for the area and contribute to biodiversity, but most importantly provide recreation for the residents, particularly those that are housed in flats built after the estate and with little consideration for open space. Unfortunately, only the Bowling Club (set out in 1903) remains in its original function. Now more than ever the remaining 3 sites should be given the full protection set out in the St Quintin and Woodlands Neighbourhood Plan (as already detailed in the policies in the Oxford Conservation Policy of RBKC) . We live in a more enlightened age where the original ideas for the area have returned and open space, recreation and sport, growing your own food, preservation of biodiversity and clean air are all recognised as contributing to the health and well being of residents, particularly important in one of the most deprived and neglected areas of RBKC.</p> <p>Alternative locations for affordable housing have been identified, e.g. Latimer Road, in the St Quintin and Woodlands Neighbourhood Plan. The backlands should NOT be built on. Once lost these spaces will never be regained.</p>	
<p>Mr Ehrman</p>		
<p>Woofie Ltd (Tanya Same)</p>		
<p>Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...</p>		

<p>Rolfe Judd (John Osborn)</p>	<p>In conclusion, Draft Policy StWQ does not stand up to rigorous testing. The policy justification relies entirely upon outdated policy documents, and the Policy itself does not positively promote sustainable development - and therefore is not in conformity with the NPPF.</p> <p>4c) Within that part of the neighbourhood designated as a conservation area, to resist any development on land which falls outside the NPPF definition of Previously Developed Land, other than where such development provides substantive public benefit in terms of meeting social care/health needs, or provides for recreation or public amenity.</p> <p>The inclusion of this policy appears to be an attempt by the Neighbourhood Forum to respond to comments on the Consultation Draft, namely that the policies relating to the Proposed Local Green Space sought a position where no development of these spaces would be possible.</p> <p>In an attempt to set out a more positive tone to the Draft Plan, this policy has been worded in a way that suggests that it seeks to facilitate the certain types of development</p> <p>However, it is clear that the Policy and its justification have simply been worded in an attempt to directly address and prevent the sustainable development of the Nursery Lane site.</p> <p>In addition, as has been demonstrated, Nursery Lane has the characteristics of previously developed land and therefore would not be captured under this Policy. The justification seeks to set out a number of points which seek to characterise undeveloped land. The table below addresses this commentary in relation to its application to the Nursery Lane site.</p> <p>Policy/Justification wording Assessment of application of this wording to Nursery Lane site</p> <p>Open Space The site is not designated as Open Space</p> <p>Biodiversity The site does not contain a rich variety of wildlife. Its biodiversity levels are extremely low</p> <p>Undeveloped The land has been developed and has been used intensively for commercial enterprise</p> <p>'Green Lung' Trees can be retained and/or reprovided and should not curtail development</p>	<p>Furthermore, the Policy attempts to write its own version of how the nation's heritage assets should be protected, regardless of the detailed policy approach set out in national policy and advice and in the Core Strategy and related documents. The Neighbourhood Plan justification states that "Development within a conservation area should demonstrate public benefit". This is simply not the case. Development within a Conservation Area does not have to provide 'public benefit.' This approach is in direct conflict with, and fails to have regard to, the NPPF.</p> <p>4d) To maintain amenity and biodiversity by protecting mature trees on larger private open spaces and within the StQW neighbourhood, through Tree Preservation Orders and/or planning conditions on development.</p> <p>Response: Despite the redrafting of this policy it is still in direct conflict with national and local policy and is entirely unnecessary. Conservation Area policy, whilst complex, is clearly set out in the NPPF and the Core Strategy. In addition, Tree Preservation Orders also exist to provide specific protection for specific trees. Where a tree in a Conservation Area is worthy of protection, it is protected. Where any tree is worthy of protection, it is, or can be, protected. Effectively, a protected tree is a protected tree. There is no need for a Neighbourhood Plan to require something that is already protected to "remain protected." In addition, not all trees are worthy of protection – Tree Preservation Orders only protect trees worthy of protection. It is noted that a blanket approach to protecting every tree that is "mature" conflicts with the whole purpose of Tree Preservation Orders. Notwithstanding this, the term "mature" is undefined and would simply render any such Policy unclear, in direct conflict with Para 154 of the NPPF. Also, it is pointed out that Conservation Area policy and TPOs already provide appropriate protection to trees in the Neighbourhood Area. No additional policy is required.</p> <p>Also, as highlighted in the response on StQW 4(a) the land at Nursery Lane is not Private Open Space and this policy, which should be deleted because it does not have regard to national policy and therefore does not meet the basic conditions, cannot therefore relate to the site.</p>
<p>RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)</p>		
<p>Susan Wilson Gretton</p>		
<p>Doreen Pickard</p>		
<p>Amnah Shafi</p>		
<p>Matthew & Elizabeth Shaw</p>		
<p>CGMs Consulting (John Mumby)</p>	<p>Draft Policy StQW 4 – Sub section 4c</p> <p>Again this draft Policy is questioned, as well as it's inclusion in the section titled 'Open Spaces'. There is no direct link between a space or land being 'open' and whether it is Open Space or not. Whether land is PDL is a material consideration when assessing development proposals, irrespective of the type of development sought. Claiming that development of land for social care / health needs would be appropriate on land outside the Framework definition of PDL is contrary to that document. Surely it cannot be the intention of the policy to offer no resistance to development of non-PDL for assisted living development, health centres etc., however it appears to be drafted this way. It seems to be a confused policy added to the plan to seek to meet the Basic Conditions in terms of promoting sustainable development, but in fact restricts certain types of development, contrary to said conditions. There is no definition of 'substantive' public benefit.</p> <p>The last sentence of the reasoned justification is incorrect as there is no requirement that development within a conservation area 'should demonstrate public benefit, outweighing any harm to a conservation asset'. This requirement has no regard to national policy.</p>	<p>Draft Policy StQW 4 – Sub section 4d</p> <p>The wording of this policy needs reviewing. Trees without TPOs outside the Conservation Area are not protected and any retention needs to be justified against relevant policies etc. i.e. if to be protected by planning conditions, such conditions would need to meet the Framework tests. Mature trees within the Conservation Area would likely be protected by the Conservation Area designation and therefore the policy is unnecessary.</p> <p>There is no definition of 'larger private open spaces' in terms of size which is confusing. In addition, there is no protection stated for trees in public open spaces which seems irrational.</p> <p>Overall, draft Policy StQW 4 does not meet the basic conditions. Any reference to the Nursery Lane site should be deleted. In addition, other parts of the Policy should be changed or deleted, as above.</p>
<p>West London Bowling Club Co Ltd (James Tocher)</p>		

Natural England, (Sally Harries)		
Transport for London (Tom Jolley)		
Ian Sneddon		
RBKC (Patricia Cuervo)		
RBKC (Joanna Hammond)		
London Borough of Hammersmith and Fulham (Trevor Harvey)		
The Kensington Society (Amanda Frame)		
Historic England (David English)		
Alan Rivers		
David Marshall		
Judy Fox Antiques (Judy Fox)		

5 Transport

Name	5. Transport	Policy 5a - Transport	Policy 5b - Transport	Policy 5c - Transport	Policy 5d - Transport	Actions 5- Transport
Harborne						Continue the cycle route which ends at Eynham Rd/ North Pole Rd so that cyclists can make a safe passage from there along North Pole Road via the triangle to Barby Rd or St Quintins Avenue. Currently they are dumped into a traffic queue o the Wood Lane lights and vehicles manouvering between cars parked at the shopping parade causing traffic jams in both directions. Providing a red route, or cycle route along Wood Lane that is enforced 8am-6pm would help. Short term parking for the parade can be provided with P&D slots at the ends of Latimer, Bramley and Brewster
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)						

Environment Agency (Simon Banks)						
Kathleen Harvey						
ARC Associates (J Allen)						
Marine Management Organisation (Susan Davidson)						
Clare Singleton						
C.W.F. Children Worldwide Fashion (Oliver Mouglin)						
National Grid (Laura Kelly)						
Highways England (Anup Shrestha)						
Health and Safety Executive (John Moran)						
Andrea Williams						
J A Nasser				Agree	Agree	Agree
Lynn Horsford		I strongly support this proposal.	I strongly support this proposal.	I strongly support this proposal.		I strongly support this proposal.
Clive Loveless				Stop the noise and congestion traffic build up	Very important!	This very urgent.. it is terrible everyday with build-up of pollution and noise
Thomas Newman		support		Support	Support	i. Strongly support. delays on North Pole Road/ Scrubs/Wood lane are untenable. ii. Support iii. Support
Jennie Marshall					In view of the proposed development of the Old Oak Park site to the north of the St Quintin area I also emphasise my support of paragraph 5d – the requirement that any new development in the area will be required to demonstrate that no further traffic congestion will be caused.	
Molly Bell						
Rowan Someville						

Kurti		This makes sense, but as I live at the western end, on the south side of Oxford Gardens I am concerned about the noise and disruption to which I might be subjected.	Similar to my comment above.	Oxford Gardens is noticeably busier than 1985, when I moved in. Traffic calming humps were initially effective, but were soon less so because the road (but not the humps) was resurfaced! Speed limits don't appear to be observed either. There are increasing numbers of families with young children living on this street, so it should not become a main thoroughfare.		3ii. I am concerned about the disruption caused to residents who live near, particularly with south facing gardens at the western end of Oxford Gardens
Audrey Jones						
Peter & Sue Warren						
Prue O'Day						
Stephen & Josie Waley-Cohen						
J Complojer						
Hilary Baikie	The junction of St Helen's Gardens and Oxford Gardens has very poor sight lines for car users crossing East-West. When combined with the speed of cars travelling North-South, daily "near misses" occur. If scope exists, I would welcome this junction being considered for a roundabout. This could be added as an Action.					I strongly support Action 5i).
Ruth Hilary						
Naomi Sorkin						
The Hammersmith Society (Rosemary Pettit)						
Barry & Carol Dodd						
Sue Pritchett						
Edward Gretton						
Ian Butchoff						
Michael E Jones						
Mizzi Studios (Tania Martin)						

Savills (Simon Myles)						
Nigel Whitbread						
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)						
West London Bowling Club (Emma Henderson)						
Mr Ehrman						
Woofie Ltd (Tanya Sarne)						
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...		0.2.5 For accuracy, the OAPF once adopted by the Mayor of London will become Supplementary Planning Guidance to the London Plan (2015). Amend second sentence to state: "Once revised, following consultation, this document will become Supplementary Planning Guidance to the London Plan (2015)."				
Rolfe Judd (John Osborn)	Transport and Traffic: Draft Policy StQW 5				5d) Where significant development is proposed within the StQW neighbourhood, to require that it be demonstrated that this will not result in increases in traffic congestion or on-street parking pressure, to an extent that would fail to preserve or enhance the character of the Oxford Gardens Conservation Area.	Response: Parking pressure and traffic movement is not a relevant test for a designated heritage asset and relates to residential amenity and traffic movement. Consequently, the Policy fails to have regard to the NPPF. It does not meet the basic conditions and should be deleted. In addition, it is noted that the first part of the Policy fails to have regard to the explicit national policy requirement that "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe" (NPPF Paragraph 32). Furthermore there is no measure or indication of what constitutes 'significant development'. This is a meaningless phrase that introduces uncertainty and fails to have regard to national policy and advice set out Planning Guidance and the NPPF.
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)						

Susan Wilson Gretton						
Doreen Pickard						
Amnah Shafi						
Matthew & Elizabeth Shaw						
CGMs Consulting (John Mumby)						
West London Bowling Club Co Ltd (James Tocher)						
Natural England, (Sally Harries)						
Transport for London (Tom Jolley)		<p>2. New London Overground station – Western Circus For operational reasons, TfL feel that disbenefits to existing passengers on the West London Line would outweigh the potential benefits of the station proposed in the plan, due to the low anticipated demand it would generate, consequently we cannot support this proposal. However we expect that the development of the Old Oak Common area will include a new London Overground station which would provide a convenient additional option for the northern section of the St Quintin and Woodlands neighbourhood, with London Underground lines serving the southern part of the neighbourhood as presently.</p>				<p>1. Direct bus link to High Street Kensington Route 70 already provides a connection between the Neighbourhood and High Street Kensington, albeit with slightly longer journey times. It is therefore unlikely that the diversion or extension of any existing routes, or introduction of a new route to provide a new link could be justified. However as you may be aware we do keep London's bus network relative to the demand for services under review and this issue is one we will continue to consider.</p>
Ian Sneddon						
RBKC (Patricia Cuervo)						

RBKC (Joanna Hammond)	<p>Unfortunately the PTAL map is not correct. The Neighbourhood Forum has been informed, a new version has been generated and the Council requests that this is substituted for the map on page 37. A new map will be supplied to the Examiner.</p> <p>5.1.4 As a result this paragraph needs to be altered slightly to included the text underlined 'The StQW area has a PTAL score of 2 (poor) in the northern part of the neighbourhood and 3 (moderate) / 4(good) in the southern part.'</p> <p>5.3.1 The Council requests whether the following sentence can be added, 'There will be a Quietway running along from Blenheim Crescent to North Pole Road and on into LBHF, via Oxford Gardens and Latimer Road.'</p> <p>5.4.3 Kensal Portobello not Portobello North.</p> <p>5.4.4 Remove the sentence 'This contributed to the high vacancy levels for offices in this location'. Vacancy levels are low as the Council's evidence shows.</p> <p>5.5.2 PTAL calculations consider walking distances up to 960m (deemed a 12 minute walk at 80m/min).</p> <p>5.6.1 Kensal Portobello not Kensal/Portobello North.</p> <p>5.6.5 This was not mentioned in the West London Line Group HS2 Petition http://www.publications.parliament.uk/pa/cmhs2/petitions/1346.pdf</p>	The proposed location is in LBHF not RBKC.	The proposed underpass is the subject of an s106 agreement negotiated by LBHF.	The Council requests that the policy is amended to reflect the fact that the new underpass will be open to cycle traffic: In the context of RBKC policy CR1 on 'street network' to maintain the tranquillity of streets in the StQW neighbourhood area and to resist any changes to the street network which will result in motorised vehicular through traffic compromising amenity in the this part of the Oxford Gardens conservation area.		
London Borough of Hammersmith and Fulham (Trevor Harvey)						
The Kensington Society (Amanda Frame)						
Historic England (David English)						
Alan Rivers						
David Marshall						
Judy Fox Antiques (Judy Fox)						

6 Safety and 7 Shopping

Name	6. Safety and Tranquillity	Actions 6- Safety and Tranquillity	7. Shopping	Policy 7a - Shopping	Actions 7- Shopping
Harborne					

Steph Keelan (Stephanie & Oliver Keelan & Wiggins)					
Environment Agency (Simon Banks)					
Kathleen Harvey					
ARC Associates (J Allen)					
Marine Management Organisation (Susan Davidson)					
Clare Singleton					
C.W.F. Children Worldwide Fashion (Oliver Mouglin)					
National Grid (Laura Kelly)					
Highways England (Anup Shrestha)					
Health and Safety Executive (John Moran)					
Andrea Williams	St Helen's Gardens regularly sees cars and lorries speeding up from Bramley Road in an effort to get to St Quintin Avenue. There should be speed bumps. There is also a great need for a zebra crossing for St Helen's Gardens at Kelfield Gardens to access the shops. I see children struggling to cross here with the traffic and the dangerous speed of vehicles.				The vacant shops at St Helen's Gardens are unacceptable. The owners are intentionally allowing these to remain vacant in an effort to force the council to eventually allow them to be converted into residential space, which is well known in the neighbourhood. Attempts to lease these spaces have gone unanswered.
J A Nasser		Agree			
Lynn Horsford					
Clive Loveless	The area is being suffocated with building works and heavy good lorries... it has become hell!				
Thomas Newman					
Jennie Marshall					

Molly Bell					
Rowan Someville					
Kurti					The range of shops in St Helen's Gardens in 1976 was a definite reason why I chose to live just across the road in St Quintin Avenue. A local shopping parade is a real asset to a neighbourhood, as it can become a meeting place. Let's support our local shops!
Audrey Jones					
Peter & Sue Warren					
Prue O'Day					
Stephen & Josie Waley-Cohen					
J Complojer					
Hilary Baikie					Action 7ii) - The existing car parking outside the St Helens Gardens shopping parade is valued highly by myself and I surmise other residents with pets who visit the vets (an anchor tenant). As such, I object to any reduction in the existing adjacent parking.
Ruth Hilary					
Naomi Sorkin					
The Hammersmith Society (Rosemary Pettit)					
Barry & Carol Dodd					
Sue Pritchett					
Edward Gretton					
Ian Butchoff					
Michael E Jones					
Mizzi Studios (Tania Martin)					
Savills (Simon Myles)					

Nigel Whitbread					
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)					
West London Bowling Club (Emma Henderson)					
Mr Ehrman					
Woofie Ltd (Tanya Sarne)					
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	<p>6 0.2.10 The OPDC considers that the Strategic Transport Strategy supporting the draft OAPF provides an appropriate level of information for the OAPF as Supplementary Planning Guidance for the London Plan. The OPDC will be developing a Construction & Logistics Strategy to further understand and manage the impact of development on the local road network and looks forward to working with the local community in its development.</p> <p>The London Plan identifies that London's population will likely increase by 1.9 million people by 2036. Opportunity Areas play a key role in helping to deliver this growth with London Plan policy 2.13(B)(b) requiring these areas to optimise residential and non-residential output, which will likely include taller buildings. Policy 7.7 provides specific guidance for the location and design of tall and large buildings which will shape the capital's skyline.</p> <p>N/A</p>		<p>7 3.1.6 The OPDC looks forward to continued engagement with the St Quintin and Woodlands Draft Neighbourhood Forum, Wormwood Scrubs Charitable Trust and other community groups with regard to Wormwood Scrubs.</p> <p>N/A</p>		
Rolfe Judd (John Osborn)					
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)					
Susan Wilson Gretton					
Doreen Pickard					
Amnah Shafi					
Matthew & Elizabeth Shaw					

CGMs Consulting (John Mumby)					
West London Bowling Club Co Ltd (James Tocher)					
Natural England, (Sally Harries)					
Transport for London (Tom Jolley)					
Ian Sneddon					
RBKC (Patricia Cuervo)					
RBKC (Joanna Hammond)		v) It is not clear what is envisaged by 'achieving adequate access control' in Blake Close but the Council does not support the creation of gated communities or barriers as this would cause traffic to back up.		The introduction of non-shop (not A class) 'town centre uses' can contribute to the vitality of the area. They can attract people into the centre by providing useful services. In addition they can provide employees who in turn will use the facilities provided elsewhere in the centre. As such the replacement of a shop with an office or a workshop can have some value. However, care must be taken to ensure that any new use does not create dead frontage. As such the Council would suggest that any of the new uses supported by Draft Policy StQW7 have a shopfront, and consequently suggests the policy is amended to read 'subject to amenity issues and provided the shopfront is retained.'	
London Borough of Hammersmith and Fulham (Trevor Harvey)					
The Kensington Society (Amanda Frame)					
Historic England (David English)					
Alan Rivers					
David Marshall					
Judy Fox Antiques (Judy Fox)					

8 Latimer Road (8 to Policy 8b)

Name	8. Latimer Road	Policy 8a - Latimer Road	Policy 8b - Latimer Road
Harborne			
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)	<p>We would like to lend my support to the current proposal for the regeneration of Latimer Road. We have been resident on the road for the last three years, and in that time our premises have been burgled four times. There are many reasons to see the area redeveloped, the road has a rich cultural history, some great residents and is in a prime location with plenty on its doorstep. The units, while now full of creative industries, are dilapidated and due to their planning restraints continue to add a gloom to what could be a vibrant and colourful environment. It would be great to see the street restored to its former glory..</p> <p>I hope that the planning department appreciate that with all the development currently happening in the area, it would be great to have a joined up street that added an individual and quirky aspect to the changing landscape.</p> <p>I look forward to hearing the outcome of the proposal, and hope that we have a positive outcome.</p>		
Environment Agency (Simon Banks)			
Kathleen Harvey			
ARC Associates (J Allen)			
Marine Management Organisation (Susan Davidson)			
Clare Singleton			
C.W.F. Children Worldwide Fashion (Oliver Mouglin)			
National Grid (Laura Kelly)			
Highways England (Anup Shrestha)			
Health and Safety Executive (John Moran)			

Andrea Williams			
J A Nasser			
Lynn Horsford			I strongly support this proposal.
Clive Loveless			
Thomas Newman		Support	Support
Jennie Marshall			
Molly Bell			
Rowan Someville			
Kurti			
Audrey Jones			
Peter & Sue Warren			
Prue O'Day			
Stephen & Josie Waley-Cohen			
J Complojer			
Hilary Baikie	<p>With regard to this part of the Plan, I encourage RBKC to give most weight and consideration to the views of residents on the East side of Latimer Road – these residents are likely to be most affected by changes to Latimer Road and should be most invested in its long-term success of the road.</p> <p>With specific regard to Units 1-14, should RBKC wish to increase the density of buildings on the West side of Latimer Road, I disagree with the Forum's proposal for 50-75 housing units to be constructed on top of the existing commercial units on two grounds:</p> <p>i) I strongly consider that mixed-use premises will be detrimental to the aesthetic of the road – mixed-use properties all too often become neglected and partially vacant (see those currently on North Pole Road) – such properties often fail to meet the requirements of both domestic households and professional businesses.</p> <p>ii) I further consider that replacing 14 business units with up to 75 residential units is excessive development. With the forthcoming</p>		I strongly disagree to this proposal.

	<p>developments at Old Oak/Park Royal and White City, the local area should benefit from a substantial increase in housing stock. As such, I consider that any new housing on Latimer Road should match the style and size of existing housing.</p> <p>As an alternative, if RBKC wish to increase the density of buildings on the West side of Latimer Road, I propose that a number of the commercial units at either end of the row of units be permitted to be replaced with UNIFORM houses akin to either the two-storey houses at the Northern end of Latimer Road or the three-storey houses on the East side of Latimer Road.</p>		
Ruth Hilary			
Naomi Sorkin			yes I think this a good idea
The Hammersmith Society (Rosemary Pettit)			
Barry & Carol Dodd			
Sue Pritchett			
Edward Gretton			
Ian Butchoff	<p>We are owners of Unit 5 in Latimer Road, and we totally support the St Quintin & Woodlands Draft Plan, in both its aspects, to create accessibility to, and visually and practically improve Latimer Road and its environs; and, in our view, the construction of the proposed underpass will enhance the road, which is, at the present moment somewhat of an isolated backwater for both residents and employees. .These 1980s building are really the worst of speculative cheap building of the period and with good design and imagination could be improved for the benefit of all.</p>		
Michael E Jones	<p>I am the owner of Unit 9 Latimer Road Industrial Estate W10 6RQ. It is time for a complete change of direction in relation to these units and</p> <p>I strongly support the proposal that redevelopment of these buildings should be allowed, with housing above commercial space, as set out in sections 8 and 10 of the Draft Plan.</p>		
Mizzi Studios (Tania Martin)			
Savills (Simon Myles)			
Nigel Whitbread			

<p>St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)</p>		<p>5. Is StQW Draft Policy 8a, proposing the de-designation of certain sections of an Employment Zone designated by RBKC, legitimate as part of a neighbourhood plan? Does this proposed policy have sufficient regard to the NPPF, and does it meet the general conformity test. RBKC planning officers have previously argued It is not for the plan to remove the Local Plan designations – they are the Council's. In the health-check of the StQW Plan carried out in November 2014 by Christopher Lockhart-Mummery QC, his advice was: 'A NP can make land use allocations. It can, for example, "de-designate" areas subject to restrictive policies in the development plan (for example "countryside" designations) and allocate the land for, e.g., housing. Subject to the test of general conformity, there would seem to be no reason why part of an Employment Zone should not be re-allocated to a more flexible, mixed use in a NP. Proposed policies 8b) and 8c) propose, in any event, a more flexible approach'. In the recent Court of Appeal case of Larkfleet Homes [2014] EWHC 4095 (Admin), the appellants went so far as to argue that a neighbourhood plan could not include site allocations. The court's decision of 17th June 2015 firmly rejected this view, with Lord Justice Moore-Blick concluding at paragraph 21 of his judgment 'In short, the statutory regime governing neighbourhood development plans clearly allows such plans to include site allocation policies'. He went on to say 'It would indeed be very surprising if site allocation policies could not be included in them, since the location of housing is likely to be the single most important planning issue for a neighbourhood'. The StQW Forum argues that on the basis of the advice from Christopher Lockhart-Mummery QC. as reinforced by the decision in Larkfleet Homes, StQW Draft Policy 8a is a lawful part of a neighbourhood plan. Revising the boundary of an Employment Zone is a form of site allocation policy. Other NPs have designated or varied Town Centre zones and determined settlement boundaries (see Gladman case). The acceptability of StQW Policy 8a in terms of 'general conformity' needs to be assessed on the context of: · the fact that the RBKC policy CF5 on restrictive land uses within Employment Zones pre-dates the 2012 NPPF aspiration for mixed use. · both the Enterprise and Housing Chapters of the Core Strategy/Local Plan are now five years past their adoption. · RBKC decided to defer its 2012 review of the Enterprise chapter of the Core Strategy, to prioritise other elements of the Partial Review. · 10 out of a total 29 responses submitted to RBKC during its 2014 borough-wide consultation on Issues and Options for its Enterprise Review, drew attention to the</p>	<p>6. Does StQW Draft Policy 8b for Latimer Road, allowing residential use within the EZ sections of the street while retaining ground floor space (and any mezzanine) in commercial use, have sufficient regard to the NPPF? And is it in 'general conformity' with RBKC strategic policies? The RBKC Enterprise Review, re-started with Borough wide consultation in late 2014, remains uncompleted. It is understood that RBKC will publish a further Issues and Options paper combining Enterprise and Housing policy proposals, in autumn 2015. The test of general conformity to be applied to the StQW Draft Plan will need to be applied in relation to the 2010 adopted Core Strategy/Local Plan which pre-dates the 2012 NPPF. However, paragraph 009 of CLG PPG on Neighbourhood Planning states A draft Neighbourhood Plan or Order is not tested against the policies in an Changes to the GPDO which came into force in April 2015 allow for change of use from warehouse/storage to residential (with certain conditions). This new PD right applies to several of Units 1-14 Latimer Road which have been in warehouse use for the previous 4 years. A request for pre-application advice is being/has been submitted by the owner of one of the light industrial units at Units 1-14 Latimer Road. emerging Local Plan although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested (our emphasis). The Forum's view is that RBKC does not have in place 'an up to date strategy dealing with housing' (see decision in Gladman above and paragraphs 3.3-3.11 of the StQW Basic Conditions Statement. Current RBKC restrictive policy CF5 is now overridden by PD rights, in relation to those of Units 1-14 Latimer Road which have remained in warehouse or storage use. The StQW Draft Plan supports such flexibility on change of use. This request for pre-application advice, coupled with recent discussions between StQW and building owners of Units 1-14, demonstrates that individual redevelopment of these properties with housing above commercial space is a realistic and viable option. Hence additional housing units in Latimer Road are 'developable' and 'deliverable' within 5 years, at levels forecast in the StQW Draft Plan. RBKC has in the past breached its own policy CF5 in granting permission in 2007 for a mixed use development with 12 flats at 290-294 Latimer Road. The test of 'general conformity' should presumably be applied to how Local Plan policies have been implemented in practice, as well as The Council's reliance on research from Frost Meadowcroft, which concluded that all commercial and office buildings in Latimer Road are 'viable', is questionable. Even if the FM model of viability is accepted, the report reflects a period in which the West London office market has just gone through an upswing. The experience of the last 30 years has proved that such periods prove short-lived as far as Latimer Road is concerned, and that viability over the medium to long-term remains very marginal at best, as evidenced by the 2013 Peter Brett Associates study. On the question of 'general conformity', as noted in the health-check of the StQW Draft Plan, it was established in the case of BDW Trading Ltd v Cheshire West and Chester BC that 'the use of general allows for the possibility of conflict, but this gives considerable room for manoeuvre'. Mr Justice Supperstone stated 'I accept (the) submission that the only statutory requirement imposed by Condition (e) is that the Neighbourhood Plan as a whole should be in general conformity with the adopted Development Plan as a whole.' This judgment was accepted as a precedent in the more recent Gladman case (Winslow NP - see above). what is set down on paper. The StQW Forum will argue at examination that Draft Policy 8b has regard for the NPPF taking into account · the marginal viability of Latimer Road for office use · NPPF encouragement for development plans to respond swiftly to changing market conditions</p>
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			<ul style="list-style-type: none"> · NPPF encouragement to promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas (para 17). · the shortfall in recent years of achievement of London Plan housing targets within RBKC. <p>The StQW Forum will argue at examination that Draft Policy 8b 'generally conforms' with RBKC strategic policy, taking into account</p> <ul style="list-style-type: none"> · the judgments in the BDW Trading (Tattenhall NP) and Gladman (Winslow NP) cases · the fact that RBKC has previously breached its own policy CF5 resisting residential use in the EZ sections of Latimer Road · the contribution that additional residents can make to the EZ, in terms of vitality, footfall and community safety, without net loss of employee numbers in the street.
West London Bowling Club (Emma Henderson)			
Mr Ehrman	<p>As the owners of a commercial building in Latimer Road, Clobb Properties has previously supported the Neighbourhood Plan and in particular its proposals for mixed uses in Latimer Road to help revive and regenerate the street.</p> <p>We continue to support the Neighbourhood Plan and would like this response, and also our previous comments, to be taken into account when the appointed Inspector considers it.</p>		
Woofie Ltd (Tanya Sarne)	I have a business at 329 Latimer Rd. I fully support the neighbourhood plan and the revival of Latimer Rd.		
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	<p>8 5.1.2 The OPDC considers that the Strategic Transport Strategy supporting the draft OAPF provides an appropriate level of information for the OAPF as Supplementary Planning Guidance for the London Plan. The OPDC will be developing a Construction & Logistics Strategy to further understand and manage the impact of development on the local road network and looks forward to working with the local community in its development. N/A</p>		
Rolfe Judd (John Osborn)	Regenerating Latimer Road Draft Policy StQW 8	8a) The Local Planning Authority to de-designate those sections of Latimer Road currently defined as part of the combined Freston Road/Latimer Road Employment Zone, within the RBKC Local Plan	8b) To allow residential use of upper floors of existing and redeveloped B class buildings in Latimer Road, provided that the ground (and any mezzanine floor) remains in commercial use.
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)			

<p>Susan Wilson Gretton</p>	<p>I would further like to add an observation regarding the plan to develop the site at Nursery Lane.</p> <p>The streets around North Pole are often blocked with traffic tracking back down Barlby Rd from the North Pole Roundabout. Traffic also often backs up on Latimer Road. I walk through here twice a day almost every day all week with my dog.</p> <p>The cost of dwellings in our area has brought in new residents who almost always drive huge cars and have a small one as well. From my observation the women in particular do not use the tube or bus, they drive. I try to always use public transport and note who accompanies me through the streets. The congestion around the northern area will become impossible and will lead to a deterioration in air quality.</p> <p>the area is under stress and strain from building works at present, and noise is already a constant problem. Protection of green space is essential and to create a small new green space would be a major achievement in the structure of the local built environment.</p> <p>many new houses are being built at present nearby and at times I wonder if the poorer end of the Borough isn't being expected to shoulder the burden of too much new building and development. I refer to Latimer Rd area, Wornington Green, etc The whole North Kensington area is very densely populated and increasing the built up area may be unwise in social terms. How would noise be controlled in this small area with so many additional residents? We all live very very close to our neighbours, greater proximity will not help social cohesion.</p> <p>the water table and water absorption in periods of heavy rain remains a problem. This area is actually marshy and in winter water runoff is extreme at the Little Wormwood Scrubs corner, by the Council Workshop and maintenance rooms.</p>		
<p>Doreen Pickard</p>			
<p>Amnah Shafi</p>	<p>As I understand it, the government have introduced a scheme that will allow some minor changes to local areas for the good of the community by asking local residents to research and come up with plans on what will improve the area that they know and live in on a day to day basis.</p> <p>I have not read the whole document in a great level of detail but even I can appreciate the huge amount of work that has gone into researching, gathering evidence and producing the neighbourhood plan, it seems to be very thorough. I am a firm believer in listening to the people on the ground in all matters when there are problems that need to be fixed as they tend to be the people with the most amount of information.</p> <p>I am only particularly concerned with Latimer Road and I will therefore voice my opinion on that, although I am sure there is equal value in many other of the points in the document.</p> <p>I know the road well and have witnessed problem after problem along this road. Never anything serious, generally speeding cars, or anti social behaviour and petty crime.</p> <p>The long stretch of road is completely different to any other road in K and C. It stands out in the extreme yet is surrounded by roads that have been gentrified over the years (largely for the better). Our borough, and particularly W10 is a safer and nicer place to be than it was 15, even 7 years ago. So much has changed around Latimer</p>		

	<p>Road, yet nothing has changed on the road itself in the last 15 years.</p> <p>Why is Latimer Road always overlooked and held back? Investment and development has been allowed to change what was also a horrid area not so long ago near Freston Road. This is a perfect example of what good forward thinking planning allows. More housing to meet the dying need for housing. Good quality commercial property attracting firms that employ long lasting employees that they nurture and invest in over years. These companies and these employees add value to our local economy. They use our shops and local services and bring footfall to a largely residential area.</p> <p>Westway sports centre has changed greatly over the years also and had alot of money spent on it. It attracts people from all over and all walks of life to use its fantastic facility - why can't we encourage the same across the whole borough.</p> <p>Latimer Road has been unchanged for as long as I can remember. It is still dangerous to walk down at night. In fact it is a ghost town after 7pm. It has people hanging around the commercial units in the "perfect" spots that allow them to hide between the buildings, or behind the cars left in the overnight parking in front of the units. A perfect example is that only two weeks ago, I had been to the building at 8pm and was walking out to my car (parked directly outside). A man was walking across the pavement and having small rocks/pebbles thrown at him by 4 or 5 13/14 year old boys. They were hurling abuse at him. My question would be, would the same thing be likely to happen on a residential or mixed use road? Possibly, but far far less likely.</p> <p>The problems associated with the traveller's camp under the flyover are well documented, but surely adding a bit of "life" back to this road is only going to help us limit any anti social behaviour that comes from anyone. I can see no negative with allowing some housing and GOOD quality commercial uses of all kinds. Gyms, creches, medical uses/nursing homes, adult education, media and the arts companies with a few flats above.</p> <p>We have seen too many poor quality tenants in our building over the years that either use the space as a "front" for their business, they rarely even enter the premises, or worse large and long vacancy rates. The continual revolving door and legal action that it takes to get rid of bad tenants further limits the property owners to do anything about the appearance of the buildings.</p> <p>In order for any of the above to happen, there needs to be some relaxation in policy to allow property owners to reinvest in their assets, which could easily be local community assets too and begin to attract the right sort of tenants.</p> <p>Given that Hammersmith and Fulham are allowing these large office buildings to be built on the site opposite the tracks, how are smaller units like my own going to be in a position to compete against these start of the art units flooding the supply to the market at knock down rents in nicer locations moments from the 2 tube lines, 5 or 6 buses and Westfield. We are so limited in terms of distance from being in any position to compete against that.</p> <p>I urge the council to support anything that will allow the regeneration in Latimer road to begin. The area desperately needs it, and local residents and businesses deserve the right to have their support (or objection) towards the future finally start to carry</p>		
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	some weight.		
Matthew & Elizabeth Shaw			
CGMs Consulting (John Mumby)	<p>Draft Policy StQW 8 – Regenerating Latimer Road</p> <p>Whilst it is technically possible for a Neighbourhood Plan to designate or de-designate areas, any proposals as such must meet the Basic Conditions of conformity with the strategic policies in the Development Plan. The draft Plan seeks to include the provision of housing and other uses on land within the designated Employment Zone on Latimer Road. The thrust of this draft policy is to seek to 'regenerate' the area, as well as to identify land for housing within the Plan area i.e. a key requirement of the Basic Conditions given the pressing need for new housing in the borough and London as a whole.</p> <p>The Examiner will note that the Council are resisting this policy on the basis of impact on the provision of Employment Land within the borough, with the Basic Conditions Statement Annexe B setting out discussions with Officers and commentary on RBKC's review of the earlier version of the draft Plan. I will not repeat here as the information is clear.</p> <p>Policy CF5 of the Core Strategy resists the loss of business floorspace (B Class uses) and the introduction of residential uses including student housing or any form of living accommodation in Employment Zones. Latimer Road is included within such a designation in the Core Strategy. Policy CF5 is clearly a strategic policy as it seeks to ensure that the identified need for employment land within the borough is protected and, where possible, enhanced. It is informed by the London Plan, the strategic planning document for the wider area. The wording of the policy is not ambiguous, it states that B Class uses are protected and that no living accommodation in the designated Employment Zones will be supported.</p>	<p>Section 8a) of the draft NP seeks the removal of the Employment Zone designation. This fails the Basic Conditions as it conflicts with the Core Strategy. A de-designation would allow any type of land uses to be provided, subject to other policies in the Development Plan.</p> <p>The Council have a Commercial Property Study from 2013, compiled by Peter Brett Associates, which analyses the Latimer Road Employment Area. The study concludes at para 4.71: 'There is no effective demand for new industrial development in Latimer Rd / Freston Rd, owing to the market pressures for residential development. But the evidence suggests that the policy of safeguarding the existing stock remains perfectly sustainable. In general, the best or only argument open to owners seeking residential redevelopment will be that industrial space is not financially sustainable. But this case should be very difficult to make in the zone, because the market is tight, with high occupancy and high rents.'</p> <p>Given the conclusion of a 'perfectly sustainable' commercial area of B Class uses, it is questioned why this designation should seek to be removed.</p>	<p>Section 8b) also fails the Basic Conditions as it conflicts with the Core Strategy by recommending that residential uses be provided. It requires the ground floor of any redeveloped sites to remain in commercial use (not specifically B Class). However, it is commonly accepted that B Class uses within residential areas, or below residential accommodation, can cause friction. It is unlikely that industrial or light industrial uses below residential accommodation would be able to function restriction free due to likely effects on the amenity of the residents above (noise, fumes, possible hazardous uses etc.). This is demonstrated by Core Strategy Policy CF5 resisting residential uses in the defined Employment Area and the analysis of the Peter Brett Commercial Property Study of 2013 which concludes at par 4.73:</p> <p>'As for offices, it may be suggested that competing priorities be reconciled through mixed use intensification, where sites are redeveloped for industry / studio use with residential above. In our view this is not advisable, because residential and commercial uses are generally incompatible. Proximity to housing exposes the industrial occupier to contingent liabilities or at least being classified as an inconsiderate neighbour. Residents generally object to the noise, vibration, vehicle movements, parking, loading/unloading, smells etc generated by industrial operations, and industrial business do not want to operate in places where such objections will arise. Therefore the industrial / studio element of the scheme would not be attractive to end users.'</p>
West London Bowling Club Co Ltd (James Tocher)			
Natural England, (Sally Harries)			
Transport for London (Tom Jolley)			
Ian Sneddon			
RBKC (Patricia Cuervo)			

<p>RBKC (Joanna Hammond)</p>	<p>The opening quotes from Peter Brett Associates RBKC Commercial Property Study 2013 are selective. The selected quote: 'As we have seen, the offices to the north of the zone are not well occupied and command low rents. The root of the problem is the area's poor environment and difficult access, and the lack of a critical mass of office property. If this does not change, these offices may not be an economically sustainable land use in the long term.' goes on to contradict the basis of the suggested policies by saying: 'It has been suggested that mixed-use redevelopment, providing offices on the ground floor with housing above, would provide a financially viable solution. In our view this is not the case. Offices that are part of mixed-use buildings may work once or twice to attract tenants, but they are generally unattractive to occupiers, and especially to Kensington & Chelsea's core market.'</p> <p>And 'Analysis of mixed use schemes in other central London fringe areas indicates that ground floor office stock is generally difficult to let.'</p> <p>8.1.1 There are three shopping parades. The Council does not concur with the view that these centres are at risk of becoming unviable or that the properties in Latimer Road are under-occupied. There are many reasons why investment is not made, the hope of achieving greater returns through residential development is likely to be one.</p> <p>8.1.2 The Council does not concur with the view that the Latimer Road Employment Zone is 'not currently contributing to sustainable development.' To the contrary the Council is of the view that Latimer Road is a vibrant area containing a mixed of firms which are contributing to the Borough's and the wider economy. This is based on two pieces of recent evidence:</p> <ul style="list-style-type: none"> • Survey of businesses in the area • Commercial viability report <p>Business Survey A survey carried out by the Council has indicated that the 27 buildings in Latimer Road are currently accommodating 54 firms. These firms are varied in nature, but have a particular concentration in the creative sector. There are not firms characteristic of a stagnated or declining area.</p> <p>Frost Meadowcroft This is supported by a study recently completed by local agents, Frost Meadowcroft, carried out on behalf of the Council. This report looked at the viability of the commercial units in Latimer Road and has concluded (6.1.1) that, 'the results of this study have conclusively shown the viability of the existing commercial properties.' This conclusion has been based upon both qualitative and quantitative approaches.</p> <p>From this report we would particularly like to highlight:</p> <ul style="list-style-type: none"> • As of April 2015, Frost Meadowcroft's research indicated there were 'limited levels of supply and strong occupier demand which has led to minimal vacancy levels in the local market and in the study area.' Frost Meadowcroft noted that this 'has stimulated rental growth.' (5.1.1). Indeed at the time of the study only two premises in the Latimer Road area were vacant, and being marketed, with the area, or just 2.9% of the total stock available. An availability rate of 8% is a level one would normally expect to allow the market to operate effectively. <ul style="list-style-type: none"> • For the quantitative assessment, Frost Meadowcroft looked at the 	<p>The Council objects strongly to StQW Policy 8a policy and considers it should be deleted, on the grounds that:</p> <p>a) it is contrary to Policy CF5 location of businesses uses that is a strategic policy which affects more than just the Royal Borough, and one on which the Borough has a duty to cooperate with other boroughs. This policy also meets the definitions of strategic policies set out in the NPPF paragraphs: 16; 156;157;178 and 184.</p> <p>b) The Council has demonstrated to the satisfaction of central Government that the whole borough should be exempt from permitted change of use from office to residential. This was based on evidence which can be seen http://www.rbkc.gov.uk/planningandbuildingcontrol/planningapplications/guidanceandadvice/checkifyouneedpermission/changeofusefromcommercial.aspx</p> <p>c) The Council is fully aware of the concerns that have been raised by landowners in the area and will be considering the best policy for Latimer Road as part of the current Enterprise policy review which started in 2014, and in the context of the Housing policy review which will run alongside. It is the Council's intention that these policies will be submitted for examination in the latter part of 2016.</p> <p>d) In order to understand the issue the Council has commissioned new evidence to establish if employment uses are viable in this area which concludes it is. However, the huge value difference means that it is likely all office space above ground floor would convert to residential if this policy was adopted.</p> <p>e) This is an area which is likely to change significantly in the near future as the Imperial West development is completed and an innovation district created, as detailed above. This is an issue that will be considered as part of the Enterprise Core Strategy Review in order to establish the most appropriate strategic response.</p>	<p>As with policy 8a above, the Council objects strongly to this policy and considers it should be deleted because it is contrary to Policy CF5, which is a strategic policy.</p> <p>The Core Strategy is explicit – in that it resists the creation of new housing within the Employment Zone (CF5 (I)). This reflects the concern that the introduction of higher value uses can jeopardise the remaining business uses, be this by the raising of hope values or through conflicts with the remaining business uses.</p> <p>The Council is pleased to hear that the StQW NF feels that the Borough has a strong overall case for exemption, and welcomes working with the forum in the future should an article 4 direction be necessary to continue to protect B class uses. However, the Council does not concur with the view that Latimer Road is in decline, with rents insufficient to allow the long term viability of the area. To the contrary, the work carried out by Frost Meadowcroft on behalf of the Council concludes that the area is a viable office location with a long-term future.</p> <p>The Daft StQWNP notes that para 51 of the NPPF states that LPAs should 'normally approve planning applications for change of use to residential use...from commercial buildings where there is an identified need for additional housing in the area, providing that there are not strong economic reasons why such development would be inappropriate.' The Council does not concur with the view of the StQW NF that the policy accords with this paragraph. Firstly, it should be noted that the Council has a housing trajectory which demonstrates that it will be meeting its housing targets over the lifetime of the plan, and that it is meeting its five year supply. Secondly, the Council is of the view that there are strong economic reasons to resist changes of use of offices and other B class uses to residential in this area. This has been supported by the Inspector when the current Core Strategy was examined, and found to be sound in 2010. This view was further supported by the Government when choosing to grant the entire Borough an exemption from the liberalisation of the planning regulations in 2013. All business uses could contribute to both a local and to a wider strategic need.</p> <p>In addition the 'building of a strong, competitive economy' is a central tenet of both sustainable development and of the NPPF. Para 22 notes that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.' The Council is satisfied that there is a reasonable prospect of these properties being used for B class uses. They are currently used as such and the Council has evidence to show that they are viable uses for the future. The retention of the premises is essential for the maintenance of a strong competitive economy.</p>
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	<p>nature the properties within the Employment Zone, their nature and condition, and the rents which can be achieved. They have then assessed ongoing viability in two ways; by a residual appraisal method and by what they term, 'profit on cost'. The residual appraisal method considers the building's net worth before and after refurbishment, and whether the cost of the refurbishment is more than offset by the subsequent increase in value. This is most relevant for the investor/purchaser. For 'profit on cost', the viability of the investment in cash terms to bring each property up to a modern standard for the tenant market is considered. This assessment does not consider the effect in the building's investment value but purely the return gained from the capital employed to effect the refurbishment project. The refurbishment is considered to be viable when the return on capital employed is 5% or more. This is most relevant for the existing owner.</p> <ul style="list-style-type: none"> • Frost Meadowcroft concluded that the business stock in Latimer Road is viable by both measures. Land owners may achieve greater returns if business floor space were replaced by higher value uses such as housing – but that is not the same as business uses not being viable in their own right. <p>8.1.3. It is not entirely accurate to suggest that the Council's policies are 'restrictive' in terms of 'changes of use from B1 office/ light industry to any other use class'. Policy CF5 of the Core Strategy is explicit. The Council does promote the Borough's Employment Zones, 'as locations for small businesses' (CS Policy CF5(m)) but will allow the loss of a business premises where this will 'directly support the function and character of the zone.' This would not preclude the introduction of a shop, a cafe or a gym, for example, where this can be shown to be a service likely to be used by those working in the area. It could not, however, be used to support replacing large amounts of B class business floorspace with shops and to create a new town centre. The reasoned justification for Draft Policy StQW8(d) notes that there is some flexibility which, 'goes some way' to achieving the flexibility needed but that it does not go far enough.</p> <p>8.1.5 While there are clear differences between Freston Road and Latimer Road, it has been the same policies to protect employment space that has seen the growth of Freston Road as a significant cluster of headquartered, major employers. The 'Yellow Building' has become Monsoon's headquarters. Monsoon subsequently leased out part of the building to Stella McCartney, Talk Talk occupy the 'White Building' and the smaller 'Studio' building is multi-occupied, with tenants such as ColArt. The Phoenix Brewery has attracted tenants such as Live Nation, Clearpoint Media and BMG Chrysalis. There is no reason to think that this will not continue and move further north as space in Freston Road is taken up. The chapter fails to put Latimer Road into the context of the opportunity presented by Imperial West. Imperial West's potential to drive commercial activity on the fringes of the White City Opportunity Area should not be overlooked but has been ignored by the Plan. Imperial West's new campus will be at the centre of a new 'Hard-Tech' cluster for London, creating spinouts of its own and attracting those needing to be close by. We understand that all the start-up space in this development has been taken up. As seen around the City of London fringes with tech city, marginal sites, like those offered by Latimer Road, offer affordable locations for start-ups, in turn improving property returns and regenerating areas. The Enterprise Review is the appropriate place to consider how Latimer Road and Freston Road, and indeed other parts of the Borough (like under the Westway) might develop in this light. Our evidence suggests that commercial space retained only at the</p>		
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	<p>ground floor, with residential above, is too simplistic and unsustainable (see Peter Brett quote above). An approach of greater nuance, with greater variety of layouts is a more viable option. However, in an area multiple property ownership, achieving such nuance is challenging but will be approached by the Enterprise Review.</p> <p>8.1.6. (strand one) The Council does not concur with the views set out within the draft Neighbourhood Plan that, 'the current policies are not proving successful in their own terms - in retaining B1 office use within an Employment Zone' or that the 'offices at the southern end of the street have low levels of occupancy', and that, 'lettings are at rent levels which have been deemed by independent consultants as unviable, or barely viable, for future investment.'</p> <p>With regard vacancy: the Frost Meadowcroft study shows that as of April 2015 just two units in the whole of Latimer Road were vacant (and available), or just 2.9% of the total stock. An availability rate of 8% is a level one would normally expect to allow the market to operate effectively.</p> <p>The Council notes that the 2013 Study carried out by Roger Tym and Partners on behalf of the Council did state that, 'the stock [in Latimer Road] is much more marginal.' (Para 4.48) and 'that the Council should consider relaxing the policy that safeguards existing offices.' It should be noted that this was not/ and is not a Council policy. We have commissioned further research to consider the long term viability in more detail and have reached different conclusions.</p> <p>The Frost Meadowcroft report looked at viability at a greater depth than the Roger Tym and Partners study, which concentrated on rental incomes rather than returns on investment in bringing buildings up to standard. The Roger Tym and Partners study merely suggested that rental incomes of less than '£200 or so, it may not even be viable to maintain existing properties in a lettable condition' The Frost Meadowcroft report has shown that this is not the case.</p> <p>4.158 of the Roger Tym and Partners study suggest that the Council may have to consider relaxing the policy the safeguards existing offices, because that stock may become unviable. Frost Meadowcroft concluded that the stock is viable.</p> <p>The Frost Meadowcroft report was informed by data collected in Spring 2015 rather than that from 2012 as used by the Roger Tym and Partners. Circumstances have changed significantly in this time. In May 2013 the Royal Borough was one of the few councils in the Country to achieve an exemption to a liberalisation which would ordinarily remove the need for planning permission for changes of uses from offices to residential. In granting this borough-wide exemption the Secretary of State recognised that liberalisation could have both 'substantial adverse economic consequences at the local authority level' and cause 'a loss of a nationally significant area of economic activity.' We were also able to demonstrate that the 'proposed area of exemption [was] the smallest area necessary to address the potential adverse economic impact'. It should be reiterated that the exemption was borough-wide and as such did include Latimer Road. Para 6.1 of the Council's representations, seeking the exemption, set out the reasons for the entire Borough's exemption. It is useful as was self evidently accepted by the CLG in granting the Borough-wide exemption. It states that:</p> <p>'The broad distribution of office premise and interlinked business clusters across Kensington and Chelsea supports the case for an exemption for the whole borough. The Borough is small in area,</p>		
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	<p>densely developed and there is a strong argument that the whole borough represents a vibrant, interconnected set of closely related business clusters.'</p> <p>The nature of the operators occupying the units with Latimer Road is also interesting. Whilst they may be characteristic of firms looking to located in a less than prime location, they are very much the type of firm of significance to the local and the wider economy. They include recording studios, digital publishing and marketing, advertising, public relation firms, architects, fashion, and interior design, as well as the more traditional pseudo light industrial uses of commercial catering and laundry. Many of these are very much the firms one would expect, firms in the wider 'creative sector' and firms which contribute to the clusters of industries of such importance to the capital's economy.</p> <p>The nature of the Borough's office market has changed since the gaining of the exemption in 2013. This has seen a gradual erosion of the office stock elsewhere, and an increasing importance of that which remains within our Borough. Our neighbours in Hammersmith and Fulham have been particularly hardly hit, suffering some of the highest levels of prior approval applications in the Capital. This erosion of existing space has helped drive what Frost Meadowcroft considers to be an 'all-time low [of office availability] in the West London market' and 'an availability rate in Royal Borough of Kensington and Chelsea which is at 1.3%.'</p> <p>Frost Meadowcroft considered the future outlook for the area. They remain positive about the Latimer Road area with 'continuing demand for tenants and owner occupiers of varying sizes' with the, 'improving recognition of the immediate area as an accepted office location, as future developments come to fruition, is helping to establish this area as an established commercial centre.' (Para 3.9.1) Viability will further improve as the development of the innovation campus by Imperial Collage across the railway in Hammersmith and Fulham, close to the proposed underpass link connecting Latimer Road and Imperial West is 'undoubtedly going to have a positive influence on the Latimer and Freston Road Employment Zone.' (para 3.9.2.)</p> <p>Taken in its entirety, this does not indicate a situation within Latimer Road as an area 'unviable or barely viable for future investment.'</p> <p>The Roger Tym and Partners report quoted at the beginning of the chapter considers industrial/ workshop uses in Latimer Road. It notes that many of the units designed for light industrial uses are in fact used as studios. In para 4.69 Roger Tym and Partners notes demand for these units by 'both the creative industrial and traditional light industrial/storage uses.' They conclude in para 4.71 that, 'the policy of safeguarding the existing stock remains perfectly sustainable.' They go on to note that, 'in general, the best or only argument open to owners seeking residential redevelopment will be that industrial space is not financially sustainable. But this case should be very difficult to make in this zone, because the market is tight, with high occupancy and high rents.' Roger Tym and Partners helpfully offer the choice for the LPA (para 4.72). 'The Council may ... consider that housing has higher priority than industrial/studio uses, and therefore it could relax the policy that safeguards these uses. If this option were chosen, it would contribute to the squeezing out of industrial and quasi-industrial uses occurring throughout central and inner London.' This conclusion supports the approach taken within the Borough's Core Strategy, that B class uses must be protected.</p>		
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	<p>8.1.7 Given the nature of the borough's property market any residential development is unlikely to be 'affordable' in any sense. Right Move shows that flats in the road sold for between £427,500 and £670,000 in 2013.</p> <p>8.1.8 comments on the points in order:</p> <ul style="list-style-type: none"> • This point is not accepted as set out above • This point is not accepted as set out above • There is nothing in the designation of an Employment Zone that would lead to the loss of footfall described. In fact in office use the area would have a higher density of daytime population than would the case in residential use, which is likely to be empty during the day, and occupies considerably more sq metres per person accommodated than office use. • The whole Employment Zone has very high levels of occupancy. • The Community Safety Team has provided comments on how this issue is being tackled in the response to chapter 6. • This point is not borne out by the evidence. • Housing development would be contrary to strategic policy • This view is not accepted by the Council, it is wrong to make assumptions about employment density and use these to justify loss of employment floorspace. There is every reason to consider that both employment floorspace and employment density could increase in this area in the future. • The Council's strategic policy aims would not be achieved. <p>8.1.9 Each planning application received is considered on its own merits by the Council, these decisions do not suggest that that policy 8b is in general conformity with the Council's strategic policy.</p> <p>8.2.1 There is no evidence that these properties are vacant or under-used.</p> <p>8.3.5 This would be contrary to strategic policy.</p> <p>8.5.1 The Council has provided evidence to Central Government to prove that there is a strong economic case to prevent loss of office to residential.</p> <p>8.6.1 The Council has not fallen behind on its housing targets.</p> <p>8.6.2 Any part of this Borough is developable and deliverable as a location for housing.</p> <p>Unfortunately the Council cannot support any of the supporting text in Chapter 8.</p>		
London Borough of Hammersmith and Fulham (Trevor Harvey)			
The Kensington Society (Amanda Frame)			
Historic England (David English)			
Alan Rivers			
David Marshall			
Judy Fox Antiques (Judy Fox)			

8 Latimer Road (Policy 8c to Action 8)

Name	Policy 8c - Latimer Road	Policy 8d - Latimer Road	Policy 8e - Latimer Road	Actions 8 - Latimer Road
Harborne				
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)				
Environment Agency (Simon Banks)				
Kathleen Harvey				
ARC Associates (J Allen)				
Marine Management Organisation (Susan Davidson)				
Clare Singleton				
C.W.F. Children Worldwide Fashion (Oliver Mouglin)				
National Grid (Laura Kelly)				
Highways England (Anup Shrestha)				
Health and Safety Executive (John Moran)				
Andrea Williams				
J A Nasser	Agree		Agree	
Lynn Horsford	I strongly support this proposal.	I strongly support this proposal.		
Clive Loveless				
Thomas Newman	Support	Support	Support	Support
Jennie Marshall				

Molly Bell				
Rowan Someville				
Kurti				
Audrey Jones				
Peter & Sue Warren				
Prue O'Day				
Stephen & Josie Waley-Cohen				
J Compojer				
Hilary Baikie				
Ruth Hilary				
Naomi Sorkin	It is important to have facilities such as cafes ect to serve Latimer road and the people who work in it . it is a very long street and the propoede theatre/cafe at unit 8 is very much to be desired	This will be an important hub of creativity which will also be an inspiration for people in the council properries srpound and will turn Latimer Road into a vibrant and creative road	This will offer flexibility of usage wh more residential space available in the ever decreasing supply in this area	
The Hammersmith Society (Rosemary Pettit)				
Barry & Carol Dodd				
Sue Pritchett				
Edward Gretton				
Ian Butchoff				
Michael E Jones				
Mizzi Studios (Tania Martin)				
Savills (Simon Myles)				

Nigel Whitbread				
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)	<p>7. Does StQW Draft Policy 8c, to allow A and D class uses within the EZ sections of Latimer Road, have sufficient regard to the NPPF? And does it 'generally conform' with RBKC Core Strategy/Local Plan policies?</p> <p>An application is being considered by RBKC for continuing use of one of Units 1-14 Latimer Road as a theatre (D class use) with the addition of a cafe (A3 use). The application has yet to be determined.</p> <p>This application has been supported by the St Helens Residents Association, and is in line with StQW Draft Policies to regenerate Latimer Road as a cultural quarter and to allow A and D class uses within the EZ sections of the street. The Forum will argue at examination that StQW Policy 8c generally conforms with RBKC Policy CF5 in that it proposes a modest extension and clarification of CF5(j) in terms of defining activities which 'directly support the employment zone'.</p>			
West London Bowling Club (Emma Henderson)				
Mr Ehrman				
Woofie Ltd (Tanya Sarne)				
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...				
Rolfe Judd (John Osborn)	<p>8c) To allow A1, A2, A3, A4, D1 and D2 class uses, along with any B class use other than B2 and B8 (over 500 sq.m) within Latimer Road, where such uses contribute to the vitality of the street and to the wider neighbourhood area.</p>	<p>Please note representations are not being made on StQW 8(d) or (e).</p>	<p>Please note representations are not being made on StQW 8(d) or (e).</p>	<p>Response: Whilst the principal response to this policy is likely to come from RBKC, given that it is not in general conformity with the strategic policies of the development plan, we consider that the draft Policy and the supporting text fail to make a comprehensive case for the changes proposed. The Neighbourhood Plan seeks to create a mixed use employment and residential zone without any understanding of the current uses on the site and the impacts of future development on those uses and the wider delivery of jobs. In regard to the StQW 8(a) and the de-designation of the properties identified in the Freston Road/Latimer Road Employment Zone no documentary or empirical evidence is presented other than a schedule of existing uses and areas and reference to the Peter Brett/Roger Tym 2013 study which highlights marginal viability for offices in the area. However no reference is made to the 2009 Roger Tym/LSH Employment Land Review which forms part of the evidence base for the Core Strategy. This document highlights that the Freston Road/Latimer Road EZ is principally focused towards industrial and warehousing. Paragraph 3.27-3.29 notes that: Of Kensington and Chelsea's small stock of</p>

				<p>industrial/warehouse space, most is located in Latimer/Freston Road. Business occupiers in this area are mostly light industrial users, such as car servicing garages which serve both local residents and a wider catchment. Car garages in particular probably attract customers not just from the immediate area, but from the Borough as a whole and beyond. These types of services play a key role in the community, as local residents do not want to travel long distances to have their car serviced, for example. As a result, the limited supply of light industrial/warehouse properties enjoys steady demand from occupiers.</p> <p>There is also healthy demand for low-cost offices/studios, from small and start-up businesses, often in the creative industries. In contrast, for mainstream offices Freston Road/Latimer Road is seen as a very marginal location and there is little demand. Thus the response within the 2013 report is consistent with the 2009 Employment Review which is</p> <p>that there is little demand for offices however there exists demand for industrial and warehouse space for which there is some demand, and that this was the one area within the borough which provided for this type of employment use.</p> <p>The StQWNP does not refer to the section in the 2013 Report on Industrial and Warehouse use in the Freston Road/Latimer Road EZ. Paragraph 4.71 and 4.72 states that:</p> <p>4.71 There is no effective demand for new industrial development in Latimer Rd / Freston Rd, owing to the market pressures for residential development. But the evidence suggests that the policy of safeguarding the existing stock remains perfectly sustainable. In general, the best or only argument open to owners seeking residential redevelopment will be that industrial space is not financially sustainable. But this case should be very difficult to make in the zone, because the market is tight, with high occupancy and high rents.</p> <p>4.72 Alternatively, the Council of course may consider that housing has higher priority than industrial / studio uses, and therefore it could relax the policy that safeguards these uses. If this option were chosen, it would contribute to the squeezing out of industrial and quasiindustrial uses that is occurring throughout central and Inner London.</p> <p>This wholly contradicts the evidence presented within the Neighbourhood Plan and highlights that the findings of the 2013 Report are being entirely misrepresented in the Plan.</p> <p>In regard to StQW Policy 8(b) we consider the principle of residential development above lower floor employment space is contrary to Policy CF 5 of the Core Strategy. As highlighted above this policy was supported by an evidence base which includes a series of employment reviews/reports.</p>
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RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)				
Susan Wilson Gretton				
Doreen Pickard				
Amnah Shafi				
Matthew & Elizabeth Shaw				

<p>CGMs Consulting (John Mumby)</p>	<p>Section 8c) also fails the Basic Conditions where there is a loss of employment land. Indeed the proposed 'allowed' land uses, including A Class uses, appears to conflict with an earlier section of the draft NP (Section 7) which seeks to improve the viability of local shopping parades. The Latimer Road area is not a designated retail area and thus the introduction of new retail uses here could prejudice the health (and viability) of the 3 Neighbourhood Shopping Centres within the Plan area.</p> <p>Given the draft Plan recommends new A Class uses outside defined retail centres then it is in conflict with the Framework and Core Strategy polices CK2 and CF3, thus failing the Basic Conditions. A revision of the wording of section 8c) could be beneficial, referring to the need to impact and sequential assessments, in line with the Framework and Policy CF1, however in practice this would just be a repeat of Core Strategy policy(ies) and therefore unnecessary.</p>	<p>Sections 8d) and 8e) – no commentary.</p> <p>In summary, it is clear that the draft Policy StQW 8 parts a), b) and c) fail the basic conditions. They should be deleted, otherwise the Neighbourhood Plan does not meet the basic conditions and cannot proceed to Referendum. The Latimer Road area is protected for employment uses, with housing restricted by policy. The draft NP policies could, dependant on site characteristics for any given B Class site in the defined area, allow the loss of a medium sized B Class unit and replace it with a mixed use scheme of A Class use at ground floor and residential above. Clearly this does not align with the Council's strategic policies.</p>	<p>Therefore, in terms of housing, the Latimer Road Employment Zone does not provide a viable site to provide new housing, something the NP must do to accord with the strategic policies of the RBKC Development Plan given the housing need identified in the Core Strategy and London Plan. The Neighbourhood Plan is not in general conformity with the strategic policies of the development plan in this regard. It fails the basic conditions.</p>	<p>Draft Policy StQW 10 - Housing</p> <p>The Framework requires a Council's Local Plan to meets the needs for market and affordable housing and identify a supply of deliverable (i.e. available, suitable, achievable within 5 years) housing land, with an additional buffer of 5% on the identified need. The London Plan 2015 states a target of 7330 dwellings within the borough in the period 2015 to 2025.</p> <p>To be considered 'deliverable' the Framework identifies that sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. For sites to be considered 'developable', sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</p> <p>The draft NP considers 4 sites within it, these being:</p> <ol style="list-style-type: none"> 1. 3-4 Crowthorne Road 2. Latimer Road, Units 1-14 3. Clifton Nurseries, Nursery Lane 4. 142A Highlever Road <p>3-4 Crowthorne Road 3-4 Crowthorne Road was subject to a planning application in 2013 for 20 apartments and commercial space. This application was refused on a number of grounds, with the Council noting that the positives of the scheme did not outweigh the loss of the 1235 sq.m of employment floorspace lost. It is thus questioned whether the site can accommodate the 20 units dictated in the draft Plan, or indeed any at all without further justification. The fact that the Council felt that the 2013 application did not accord with the Development Plan (which is still current) demonstrates that it cannot be included as a possible site for 20 units in the draft NP.</p> <p>Latimer Road, Units 1-14 Consideration of the suitability of the Latimer Road area for designating new housing in the draft NP is provided above and will not be repeated here.</p> <p>Clifton Nurseries, Nursery Lane The Clifton Nurseries site is not designated in the draft NP as a potential housing site. On the balance of the site options put forward, it is questioned whether this is justified. The land at Nursery Lane is available immediately and is both deliverable and developable. It provides the lesser constraints of the other proposed sites i.e. conflict with policy, environmental matters etc. and is an opportunity to provide a number of family sized units with good quality amenity space, car parking etc. Somewhat perversely, the draft NP states in the table of Housing Options Sites that the Nursery Lane site would be deliverable for housing (in line</p>
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				<p>with the Framework definition) if it were not subject to other restrictive draft policies in the plan. The draft Plan itself thus seeks to restrict the development of a viable site that could deliver housing.</p> <p>142A Highlever Road</p> <p>The sites comprises a petrol station and industrial uses. The Development Plan restricts the loss of such uses (Core Strategy Policies CK1 and CF5) and thus the site is not deliverable for housing. Access is poor and would provide conflict of vehicles and pedestrians, as well as having limited visibility to / from those access points. The current site's use also raises environmental issues (contamination) although, surprisingly, the draft NP states it is not sensitive environmentally. In addition, the long linear nature of the site would provide a design challenge and limited the number of dwellings that could be achieved.</p> <p>On balance, the draft NP provides limited, if any new housing allocations in the area. The only site that is truly deliverable when considered against the Framework terminology is discounted on the basis on other restrictive policies within the plan. The Neighbourhood Plan fails the basic conditions in this regard.</p> <p>To conclude, the above review of the draft StQW Neighbourhood Plan demonstrates that it does not meet the Basic Conditions to make a Neighbourhood Plan when considered against relevant legislation and planning guidance. In terms of the Clifton Nurseries site, the draft Plan proposes a designation that is unjustified and seeks to dismiss the site as a viable option for residential development, despite concluding it is deliverable. In addition, the size of the site means that any housing scheme would be large enough to provide affordable housing in line with policies in the RBKC Core Strategy.</p> <p>These Representations clearly and concisely set out the case as to why the draft NP fails the basic conditions in a number of instances and it is noted that it is common practice for the examination of Neighbourhood Plans to be undertaken by written submissions only. However, if it is necessary to expand further on these points, it is requested that the appointed Examiner consider holding a Public Hearing for the draft NP Examination.</p> <p>I trust the above information is self explanatory, however should you have any questions, please do not hesitate to contact me on the details at the top of this letter.</p>
West London Bowling Club Co Ltd (James Tocher)				
Natural England, (Sally Harries)				
Transport for London (Tom Jolley)				
Ian Sneddon				

RBKC (Patricia Cuervo)				
RBKC (Joanna Hammond)	<p>The Council's strategic policy CF5j requires there be no net loss of business floorspace in Employment Zones unless to uses which directly support the function and character of the zone like gyms, shops and cafes.</p> <p>The Council would not object to the principle of supporting non B class business uses within the Employment Zone as long as such uses directly support the character and function of the zone. However Latimer Road contains just 27 commercial buildings and as such there are only limited opportunities for these alternative uses without the erosion of the business character. A free-for-all for any A1/A2/A3/A4 and D class use as proposed by Policy StQW8 would result in a complete change in character of the area. In practice this could result in the creation of a new town centre at the expense of the B class uses which are of particular importance.</p>		<p>The Council objects to this policy because the proposed redevelopment would involve the introduction of housing which is contrary to strategic policy CF5 as discussed under 8b.</p>	<p>i) The Council cannot support this Action because it objects to the policy on which it is predicated. ii) Were the current position to change, the Council may consider using an Article 4 direction to allow it to maintain control over the loss of B1 uses. The Neighbourhood Forum would be consulted on this and be able to make representations.</p>
London Borough of Hammersmith and Fulham (Trevor Harvey)				
The Kensington Society (Amanda Frame)				
Historic England (David English)				
Alan Rivers				
David Marshall				
Judy Fox Antiques (Judy Fox)				

9 Employment

Name	9. Employment	Policy 9a - Employment	Policy 9b - Employment
Harborne			
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)			
Environment Agency (Simon Banks)			
Kathleen Harvey			
ARC Associates (J Allen)			

Marine Management Organisation (Susan Davidson)			
Clare Singleton			
C.W.F. Children Worldwide Fashion (Oliver Mougin)			
National Grid (Laura Kelly)			
Highways England (Anup Shrestha)			
Health and Safety Executive (John Moran)			
Andrea Williams			
J A Nasser		Agree	Agree
Lynn Horsford			
Clive Loveless			
Thomas Newman		Support	Strongly Support
Jennie Marshall			
Molly Bell			
Rowan Someville			
Kurti			Vacant shop units give an impression of neglect, so let's chase up their owners and get the units brought back to life. Are 'pop-up' shops a possibility?
Audrey Jones			
Peter & Sue Warren			
Prue O'Day			
Stephen & Josie Waley-Cohen			
J Compojer			
Hilary Baikie			

Ruth Hilary			
Naomi Sorkin	yes the proposed theatre/ cafe will offer more employment than is currently on offer and be a good thing	yes, please	
The Hammersmith Society (Rosemary Pettit)			
Barry & Carol Dodd			
Sue Pritchett			
Edward Gretton			
Ian Butchoff			
Michael E Jones			
Mizzi Studios (Tania Martin)			
Savills (Simon Myles)			
Nigel Whitbread			
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)			
West London Bowling Club (Emma Henderson)			
Mr Ehrman			
Woofie Ltd (Tanya Same)			
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...			
Rolfe Judd (John Osborn)			
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)			
Susan Wilson Gretton			

Doreen Pickard			
Amnah Shafi			
Matthew & Elizabeth Shaw			
CGMs Consulting (John Mumby)			
West London Bowling Club Co Ltd (James Tocher)			
Natural England, (Sally Harries)			
Transport for London (Tom Jolley)			
Ian Sneddon			
RBKC (Patricia Cuervo)			
RBKC (Joanna Hammond)		<p>The Council objects strongly to this policy and considers it should be deleted:</p> <p>a) This is not a policy it is a restatement of policies 8a to e, which are contrary to strategic policy CF5.</p> <p>b) It is incorrect to make assumptions about increasing employment density and use these to justify loss of employment floorspace.</p>	
London Borough of Hammersmith and Fulham (Trevor Harvey)			
The Kensington Society (Amanda Frame)			
Historic England (David English)			
Alan Rivers			
David Marshall			
Judy Fox Antiques (Judy Fox)			

10 Housing

Name	10. Housing	Policy 10a - Housing	Policy 10b - Housing	Policy 10c - Housing
Harborne				
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)				
Environment Agency (Simon Banks)				
Kathleen Harvey				
ARC Associates (J Allen)				
Marine Management Organisation (Susan Davidson)				
Clare Singleton				
C.W.F. Children Worldwide Fashion (Oliver Mougin)				
National Grid (Laura Kelly)				
Highways England (Anup Shrestha)				
Health and Safety Executive (John Moran)				
Andrea Williams				
J A Nasser		Agree	Agree	
Lynn Horsford		I strongly support this proposal.		
Clive Loveless				
Thomas Newman		Support		Support

Jennie Marshall	I also emphasise support of paragraph 10 of the plan which suggests areas for needed housing development and affordable homes.			
Molly Bell				
Rowan Someville				
Kurti		I support this proposal, especially if it will include affordable housing	This seems reasonable	I support this proposal
Audrey Jones				
Peter & Sue Warren				
Prue O'Day				
Stephen & Josie Waley-Cohen				
J Compojer				
Hilary Baikie	With the forthcoming developments at Old Oak/Park Royal and White City, the local area should benefit from a substantial increase in housing stock. As such, I consider that the albeit laudable aim to create extra housing stock within the small neighbourhood covered by the Plan should be low priority for RBKC.			
Ruth Hilary				
Naomi Sorkin				
The Hammersmith Society (Rosemary Pettit)				
Barry & Carol Dodd				
Sue Pritchett				

Edward Gretton				
Ian Butchoff				
Michael E Jones				
Mizzi Studios (Tania Martin)				
Savills (Simon Myles)		<p>We write in support of the principle of draft Policy StQW 10(a) of the StQW Neighbourhood Plan. Our client owns this site and we are currently promoting it for a mixed use residential and employment scheme. This currently includes 8 residential units and over 1,000sq.m of employment floorspace.</p> <p>The allocation accords with Policy CP1 of the RBKC Core Strategy as it will contribute towards the overall target of 5,850 new homes. As the policy suggests, affordable housing should be provided in accordance with Policy CH2 which allows flexibility in the level provided subject to viability. It is important that viability forms a consideration in determining proposals for the site. It is also important that the policy does not become prescriptive on redevelopment proposals or it may stymie regeneration of the site.</p> <p>In accordance with paragraph 47 of the NPPF we consider that the site is 'deliverable'. The site is currently vacant and is available for development now. It is in a suitable location for a mixed use residential and employment scheme as the area is primarily residential and B1 uses are being proposed which are compatible with a residential area. There are no planning or environmental restrictions such as an allocation for industrial use, being located in a flood risk area or being subject to an ecological designation that would preclude its redevelopment. Our client is committed to bringing the site forward within the next 5 years. As such we believe that the inclusion of the site in the Neighbourhood Plan for a mixed use development is appropriate</p>		
Nigel Whitbread				

<p>St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)</p>	<p>8. Are StQW Draft Policies 10a, 10b, and 10c, which allocate housing sites within the neighbourhood area, in conformity with RBKC strategic policies? And do they have sufficient regard to the NPPF? The principle that neighbourhood plans can allocate sites for housing use has now been very firmly established in law, following the BDW Trading, Gladman, and Larkfleet cases. The Larkfleet case (at the Court of Appeal) established beyond all reasonable doubt that neighbourhood plans can establish site allocation policies. It is understood that proposals for a mixed use development on the site at Crowthorne Road (allocated within the StQW Draft Plan predominantly for housing) will come forward shortly, following a request to RBKC for pre-application advice. The landowners/developers have discussed their proposals with the StQW Forum Section 10 of the StQW Draft Plan examines the options for development on four potential sites within the neighbourhood. Draft Policies 10a, 10b, and 10c allocate three sites for housing/mixed use. These are brownfield sites in line with NPPF Paragraph 17 and the direction of the July 2015 Government proposals in Fixing the Foundations. The site at Crowthorne Road (StQW Draft Policy 10a) is both 'developable' and 'deliverable' for new housing, as evidenced by a recent request to RBKC from the landowners for pre-application advice on a proposed mixed use scheme The landowner of Highlever Garage, at 142a Highlever Road has expressed interest in retiring and making the site available for a small-scale housing development, in line with StQW Policy 10b. A request for pre-application advice for a redevelopment of one of Units 1-14 Latimer Road, to include housing above commercial space, will shortly be submitted to the RBKC Planning Department. Building owners of Units 1-14 Latimer Road, and of the office buildings have expressed support for the Draft Policies in the StQW Plan. The site at 142a Highlever Road (Highlever Garage) is also 'developable' and 'deliverable', provided that StQW Draft Policy 10b takes precedence as and when the Draft Plan is 'made', over current RBKC Policy CK1 protecting petrol stations. Latimer Road as a location for additional new build housing, above commercial floorspace at Units 1-14 is also 'developable' and 'deliverable' provided that StQW Draft Policy 8b is accepted at examination and included in a 'made ' StQW Neighbourhood Plan. The projection in the Draft Plan of an additional 50-75 units assumes that 50% of building owners at Units 1-14 would pursue this route within a 5 year period, and is seen as realistic. Conversion for residential use of upper floors of office buildings at the southern end of Latimer Road would add to this total. While it is unlikely that all or many of the owners of office buildings at the southern end of Latimer Road would pursue this option in the near future (given existing leases, a significant level of owner-occupation, and a relatively buoyant office market in the short term) the introduction of StQW Policies 8a, 8b and 10c would help to avoid a repetition of empty office space at the southern end of Latimer Road, as experienced in 2008-13 and in previous periods of low demand within the North Kensington office market.</p>			
<p>West London Bowling Club (Emma Henderson)</p>				

Mr Ehrman				
Woofie Ltd (Tanya Sarne)				
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...				
Rolfe Judd (John Osborn)	6 Housing: Draft Policy StQW 10.	10a) To allocate for predominantly housing use the land at 3-5 Crowthorne Road, subject to any development providing a 30% element of employment floorspace (B1) and meeting RBKC Local Plan policies on affordable housing.	10b)To allocate for housing use the land at 142A Highlever Road, in doing so recognising the history of the site and applying a flexible approach to RBKC policy on the protection of petrol filling stations as a social and community use.	10c) To allocate the sites occupied by Units 1-14 Latimer Road mixed use development, allowing housing use (C3) subject to ground and mezzanine floors remaining in commercial use (B1, B8, A or D class).
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)				
Susan Wilson Gretton				
Doreen Pickard				
Amnah Shafi				
Matthew & Elizabeth Shaw				
CGMs Consulting (John Mumby)				
West London Bowling Club Co Ltd (James Tocher)				
Natural England, (Sally Harries)				
Transport for London (Tom Jolley)				
Ian Sneddon				
RBKC (Patricia Cuervo)				

RBKC (Joanna Hammond)	<p>10.5.3 Offices actually provide more people per square metre and more activity, especially during the daytime.</p> <p>10.5.4 The introduction of residential uses would create hope value, which would incentivize conversion as the Council's evidence for exclusion from permitted change of use from office to residential demonstrates.</p>	<p>3-5 Crowthorne Road was granted permission for offices in 2001, but this was not implemented. In 2013 an application for 20 apartments, B1 and A2 was refused because did not meet affordable housing requirements.</p> <p>The Council accepts that a mixed use allocation for this site would be appropriate and in general conformity with the Local Plan.</p>	<p>The Council considers the current use on this site to be a mixture of sui generis vehicle maintenance and storage together with petrol filling facilities. Given the limited operation of the site as a petrol filling station the council do not consider the protection of policy CK1 would apply in this instance. Furthermore, as the other sui generis uses on the site are not B class uses, they do not fall under provisions of policy CF5. Consequently, the allocation of site for housing would be in general conformity with the strategic policies in the development plan and would make a positive contribution to meeting the boroughs housing supply target.</p>	<p>The proposed mixed use allocation would not be in general conformity with the strategic policies in the development plan. The proposed allocation is within an designated employment zone within which policy CF(i) resists residential uses including for student housing or any form of living accommodation.</p>
London Borough of Hammersmith and Fulham (Trevor Harvey)				
The Kensington Society (Amanda Frame)				
Historic England (David English)				
Alan Rivers				
David Marshall				
Judy Fox Antiques (Judy Fox)				

11 Health and Education

Name	11. Health and Education	Policy 11a - Health and Education	Policy 11b - Health and Education
Harborne			
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)			
Environment Agency (Simon Banks)			
Kathleen Harvey			
ARC Associates (J Allen)			

Marine Management Organisation (Susan Davidson)			
Clare Singleton			
C.W.F. Children Worldwide Fashion (Oliver Mouglin)			
National Grid (Laura Kelly)			
Highways England (Anup Shrestha)			
Health and Safety Executive (John Moran)			
Andrea Williams			
J A Nasser		Agree	Agree
Lynn Horsford		I support the use of this site as a medical centre.	I do not support the redevelopment of this site.
Clive Loveless			
Thomas Newman			Support
Jennie Marshall			
Molly Bell			
Rowan Someville			
Kurti		I strongly support the retention of St Quintin Health Centre as a vital asset to the community, providing the services which local residents need.	Health services must remain here.
Audrey Jones			
Peter & Sue Warren			
Prue O'Day			
Stephen & Josie Waley-Cohen			

J Complojer			
Hilary Baikie			
Ruth Hilary			
Naomi Sorkin			
The Hammersmith Society (Rosemary Pettit)			
Barry & Carol Dodd			
Sue Pritchett			
Edward Gretton			
Ian Butchoff			
Michael E Jones			
Mizzi Studios (Tania Martin)			
Savills (Simon Myles)			
Nigel Whitbread			
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)			
West London Bowling Club (Emma Henderson)			
Mr Ehrman			
Woofie Ltd (Tanya Sarne)			
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...			
Rolfe Judd (John Osborn)			
RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)			
Susan Wilson Gretton			

Doreen Pickard			
Amnah Shafi			
Matthew & Elizabeth Shaw			
CGMs Consulting (John Mumby)			
West London Bowling Club Co Ltd (James Tocher)			
Natural England, (Sally Harries)			
Transport for London (Tom Jolley)			
Ian Sneddon			
RBKC (Patricia Cuervo)			
RBKC (Joanna Hammond)			
London Borough of Hammersmith and Fulham (Trevor Harvey)			
The Kensington Society (Amanda Frame)			
Historic England (David English)			
Alan Rivers			
David Marshall			
Judy Fox Antiques (Judy Fox)			

General Comments

Name	General Comments
Harborne	There is an opportunity here for proper masterplanning of the Latimer Road site, including a coherent approach and to new building envelope sizes and style as well as remodelling the streetscape, and it could also include amenities for local needs, which RBKC could support and engage in, to make the most of re-envisioning this street.
Steph Keelan (Stephanie & Oliver Keelan & Wiggins)	
Environment Agency (Simon Banks)	
Kathleen Harvey	<p>Rather than to be endlessly consulted regarding conservation area and woodlands neighborhood plans which are not relevant to where we live , we would prefer to be consulted regarding the huge project of Crossrail2 for which we have hardly been consulted and certainly not given all the facts and THAT is on our doorstep.</p> <p>It would be nice if RBKC and the planning department were a little more transparent in that area.</p>
ARC Associates (J Allen)	<p>Our comments relating to the St Quintin Neighbourhood Plan are as follows:</p> <p>Generally we support the proposals contained in the NP although as a general comment we think that the degree of intrusion on the options for the use and enjoyment of private property by its owners in the area risks becoming excessive if all these proposals are adopted. There are many aspects of the proposals that are simply overly controlling and stifling of the natural progression and evolution that areas in central London inevitably must go through.</p> <p>There are 2 specific areas for comment that appear to be underemphasised or insufficiently bold in the NP outline as submitted.</p> <p>1. Traffic at North Pole Rd and in the area generally this is becoming a real issue for all residents particularly in the late afternoons and Fridays as commuters and commercial vehicles leave London.</p> <p>In our opinion the exit to Wood Lane from North Pole Rd should be blocked permanently and completely and traffic redirected to access Wood Lane/Scrubs Lane either from the north or the south but entry from Wood Lane into the St Quintin area via North Pole Rd should be permitted permanently.</p> <p>This then will focus local traffic into the area safely and efficiently and move commuter and commercial traffic onto the major established Westway on ramps and via the larger roads designed for this purpose to exit London to the west.</p> <p>In due course it would make sense that access to Western Avenue and the A40 from traffic to the north of the NP area should be enhanced through the Old Oak Common Redevelopment Area and redirected along the railway line near the current location of Sainsbury's off Ladbroke Grove to Victoria Ave and the A4000, avoiding the deluge we experience from that area now heading down from the northern areas into the North Pole Rd for access to the Westway and the A40.</p> <p>Furthermore the lights at North Pole Rd can then be managed to keep traffic flowing from the north and south more efficiently from Scrubs Lane and the lights at Du Cane Rd also left to flow more readily during peak periods to permit access to the Westway.</p> <p>Unfortunately there is a knock on effect from the poor management of the intersection of Western Ave and Old Oak Common Lane which results in standing traffic on the Westway above our NP area for hours in the afternoon, increasing the pollution which travels with the prevailing wind and noise over the area covered by this NP so consideration should be given to a wider area in the traffic management planning.</p> <p>At the very least the North Pole Rd and Wood Lane intersection should have yellow no stop hatching to stop the intersection being blocked constantly as drivers run the lights at each change.</p> <p>Our general concern is that the NP in isolation is insufficiently progressive and does not address the wider area traffic management in context and in isolation fails to provide a solution at all to the worst aspects of the problem. Of course we are aware of the limits of the remit but within those limits these specific local alternatives provide potential solutions.</p> <p>2. Latimer Rd Development and the connections of Latimer Rd to the east and south</p>

	<p>It makes little sense to have an east/west connector for cycles and pedestrians to Imperial College West (which we support) without also connecting the north south axis in the same way for the same groups to travel under the Westway therefore allowing efficient access to the Tube stations, buses and new developments to the south and east and to reduce unnecessary "passing traffic" being forced along Oxford Gardens.</p> <p>This provision should be incorporated into the NP regardless of the provision of an overground station in the area as its justification stands alone and with acceptance of the enhanced development rights suggested below can be provided for in the agreements with developers of the sites in the south west end of Latimer Rd.</p> <p>Our view is that the permitted developments on the west side of Latimer Road should now be able to rise to at least 7 floors and those at the south west end of Latimer Rd close to the Westway to rise well above the Westway road height. This will always be second quality space due to the combination of the proximity to the Westway and the railway line but can provide much needed new residential opportunities and sufficient offices to become viable for investment to proceed.</p> <p>There is nothing pretty about looking at the Westway from the NP area so screening it from view with a more interesting cityscape is a step in the right direction.</p> <p>These more intensive concentrations of commercial and residential development will provide critical mass for the necessary services required to support the transport hubs suggested in the NP for the area, the connection of the cycle and pedestrian access on the north/south axis and the food, bar and other facilities that the area currently lacks, and combined with the suggestions for the various transport alternatives supported in the NP reinforce the viability for new investment to come into the area.</p> <p>We do not think that the current proposals in the NP go far enough to allow confidence that the area will attract sufficient investment and therefore lose the somewhat tawdry combination of unattractive and unlettable buildings which have fallen into disrepair and the dark, foreboding and seemingly unsafe Westway dominated aspect of that end of Latimer Rd.</p> <p>The solution must be bolder and more complete, the current proposals are too modest and therefore unlikely to attract the kind of enhancement that is desired.</p> <p>The whole of that area is badly managed and very unclear from the streetscape perspective and is not seen as either safe or welcoming in any way.</p> <p>The revision of the use under the Westway (just outside the NP remit area) is inevitably linked to this redesignation and would be an opportunity to rationalise the use of the large amount of mismanaged and underutilised space in that part of the Borough and provide essential community facilities alongside the commercial and residential developments.</p> <p>Regards,</p> <p>John Allen and Diana van de Kamp Wallingford Ave W10 6PX</p>
Marine Management Organisation (Susan Davidson)	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation as it is not within our remit.
Clare Singleton	In response to the consultation period for the St Quintin and Woodlands Neighbourhood plan I would like to reiterate my support for the consultation version of the Draft Neighbourhood Plan.
C.W.F. Children Worldwide Fashion (Oliver Mougín)	<p>We are a business in Latimer Road, W10 and have previously commented on the Neighbourhood Plan to support it.</p> <p>We continue to support it and would like you to take our previous comments into account.</p>
National Grid (Laura Kelly)	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the planned route for London Power Tunnels underground cables falls within the Neighbourhood area boundary.</p> <p>From the consultation information provided, the above underground cable does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure Whilst there is no record of National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.</p>

Highways England (Anup Shrestha)	<p>Thank you for inviting Highways England to comment on the Draft St Quintin and Woodlands Neighbourhood Plan</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We have reviewed the document and have no comments to make.</p> <p>Sent on behalf of Stephen Hall (Asset Manager) at the Highways England</p>
Health and Safety Executive (John Moran)	<p>Thank you for your request to provide a representation on the Draft St Quintin and Woodlands Neighbourhood Area Plan consultation document. When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved¹.</p> <p>We have concluded that we have no representations to make on this occasion. This is because our records show that the Draft St Quintin and Woodlands Neighbourhood Area Plan boundary and the land within does not encroach on the consultation zones of major hazard installations or MAHPs. As no encroachment has been detected, the HSE does not need to be informed of the next stages in the adoption of the Draft St Quintin and Woodlands Neighbourhood Area Plan.</p>
Andrea Williams	
J A Nasser	
Lynn Horsford	
Clive Loveless	The area is being ripped apart.. and what was once a conservation area and true community is now being smothered by millionaire builders and speculators... the sense of community is dying! Save our Neighbourhood!
Thomas Newman	I strongly support this plan which has been developed with the community.
Jennie Marshall	
Molly Bell	
Rowan Someville	As a long term resident of the area around St Quintins/Oxford Gardens etc (more than 30 years and one born in London in 1966 (my postcode today is w106qn), please take note that I do not support the housing development on Nursery lane as it stands . I do support the policies in the St Quintin and Woodlands Neighbourhood Draft Plan -including the new policies 4b and 4c .I appreciate your attention and the public fora. I sincerely hope that the StQW draft plan comes to bear material weight on the decisions made by your office.
Kurti	This draft neighbourhood plan is excellent, and deserves to be adopted by RBKC.
Audrey Jones	
Peter & Sue Warren	<p>I fully support this plan for our area. We have benefited from the insight of planners who laid out this estate for the 45 years we have lived here. It is a wonderful area, not posh, but with enough space to have a good quality of life in a busy part of London. We do not want this to be spoiled for the future by building development and in particular we do not want to lose the three backlands that are a key part of the layout. We therefore fully support the sections 4c and 4d of the Plan.</p> <p>We want the Council to recognise - I'm sure they do already - that developers see RBKC as rich pickings for building/developing housing and have only profit in mind. They are not concerned about the environment and it is the Council's role to represent the residents. We therefore look to you to protect us from inappropriate housing development.</p> <p>I'm sure the referendum will show you how the people of the area feel the same.</p>

Prue O'Day	
Stephen & Josie Waley-Cohen	We support the policies in the StQW Draft Plan including the new policies 4b and 4c
J Compojer	We hereby formally request you to please take into consideration our full support for the policies in the StQW Draft Plan, including the new policies 4b and 4c.
Hilary Baikie	<p>0.1.28 Evidence base for the Plan</p> <p>Despite the significant efforts of the Forum, relatively few residents have opined on the Plan e.g. 6% of households responded to the Forum's survey questionnaire. As such, I have concerns that the majority of residents may be unaware of the Plan and its influence. Accordingly, I consider that RBKC should always be mindful of this level of engagement when viewing the Plan's contents and considering its influence.</p> <p>General</p> <p>As a general comment, I wish to express my gratitude to the members of the St Quintin and Woodland Neighbourhood Forum (the "Forum") for its significant efforts in the preparation of the St Quintin and Woodland Draft Neighbourhood Plan (the "Plan"). My above comments are on a "by exception" basis.</p>
Ruth Hilary	I have previously commented on the draft St Quintin and Woodlands Neighbourhood Plan and given it my support, I particularly support the policies in the StQW Draft Plan including the new policies 4b and 4c. These protect the back lands in the St Quintin area from being developed (confirming the policies in the Oxford Conservation Policy of RBKC). It is very important that these open spaces are retained as North Kensington has little open space and is highly populated. These spaces provide "green lungs" for the area and contribute to biodiversity. Alternative locations for affordable housing has been identified e.g. Latimer Road, in the St Quintin and Woodlands Neighbourhood Plan.
Naomi Sorkin	I am totally in agreement with the proposed developement in this neighborhood adding creative and employment opportunities and providing new cultural life to the area
The Hammersmith Society (Rosemary Pettit)	<p>Nursery Lane site, W10</p> <p>On behalf of the Hammersmith Society I am objecting to the application to build housing on the previously undeveloped Nursery Lane site in W10. Although it has been used for commercial purposes it has not been developed in any significant way; it is not brownfield land. In closely built-up residential areas, typical to Kensington and Chelsea as well as to Hammersmith and Fulham, small pocket parks, allotments or other community uses enhance residents' health, appreciation of their neighbourhood and other social goods way beyond the small piece of land at stake.</p> <p>We also support the St Quintin Neighbourhood Plan, and new policies 4b and 4c strengthening Council policy against development on the three remaining St Quintin backland sites, including Nursery Lane.</p>
Barry & Carol Dodd	
Sue Pritchett	<p>I would like to voice my concerns regarding the proposed housing development on Nursery Lane</p> <p>This an open space which is ideal for re-introducing the allotment scheme back into Kensington and Chelsea. I volunteer with Age UK as a Gardening Guardian and would love to involve the people I work with in planting their own seeds and cuttings which could then be transplanted into their gardens. It would be an activity to bring our older community members together in a shared interest. Many residents in K&C do not have a garden , I am one of them, and we would love to have a space to grow our own vegetables and/or flowers. The waiting list for such a space is proof in itself.</p> <p>I appreciate that housing is needed in the borough but it seems to me that the recent housing projects which have taken place on the Wornington Estate, Ladbrooke Grove and Latimer road areas (and I hear that the area near Trellick Tower is next) have been specifically designed to uproot the local people and gentrify the borough. The people that live and work here are not able to pay the prices of these flats and they are being forced out of the area, these working people do make a valid contribution to both K&C and London in whatever job they do</p> <p>This area still has a vibrant multicultural community despite the changes enforced since the Notting Hill film - I mean how many designer shoe shops and coffee shop chains do we really need? - and to give up this space for yet more housing when there are other areas that could be used would be a shameful act and would be detrimental to the character of North Kensington</p>
Edward Gretton	I am writing to express my support for the St Quintin & Woodland Neighbourhood Plan developed by the St Quintin & Woodland Neighbourhood Forum.
Ian Butchoff	
Michael E Jones	

Mizzi Studios (Tania Martin)	<p>I write on behalf of Latimer Studios in support of the St Quintins and Woodlands Neighbourhood Draft Plan and in particular Section 8 Latimer Road.</p> <p>In the 1980s fifty family houses on the west side of Latimer Road were demolished to make way for the 14 Industrial units. As a result, the nature of the street changed, with a dramatic loss of amenities and vital street life. We would like to see the street returned to its original urban form, with mixed use developments and for the vitality to be restored.</p> <p>Latimer Road has become subject to much crime, with many of the industrial and commercial units (which are empty out of working hours and on weekends) being broken into on a regular basis. Many of the industrial units, which could provide employment opportunities for local people, are underused, or locked up, so developing these units would not only create more local employment opportunities, but would "design out crime" making the street safer, with buildings being fully occupied.</p> <p>The development would also encourage buildings that would support the creative and cultural industries in line with RBKC Core Strategy (Policy CR6)</p> <p>There is a local need for more housing, particularly for smaller residential units for local "downsizers" and first-time buyers. Residential Units of Latimer Road offers a good solution. Residential units will above the existing commercial floor space which means that there would be no loss of employment generating floor space of the Industrial units. Plus, additional residents using the street day and night and at weekends would add vitality and safety to Latimer Road.</p> <p>Residential units above existing commercial floorspace would mean an increase in building height, and we fully support 8e) i) and the consideration of heights of nearby buildings which range from four storey at the southern end to two storey at the northern end and building heights in LBHF.</p> <p>Mixed use developments that include A3 use (cafe/restaurant) use would be beneficial, as there is a lack of amenities for people working and living on Latimer Road, which makes the street unattractive to employers and employees. Currently, all the employees in our unit eat sandwiches at their desks.</p> <p>Therefore, we fully support the StQW Neighbourhood Plan, and in particular Latimer Road Section 8</p>
Savills (Simon Myles)	
Nigel Whitbread	<p>I confirm the support I submitted to the draft plan version 22 January 2015. I am very pleased that the few reservations I had at that stage have subsequently been discussed and publicly debated and satisfactorily resolved.</p> <p>I confirm the current draft has my full support, and I welcome the new policies 2g; 4b;4c.</p>
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)	
West London Bowling Club (Emma Henderson)	
Mr Ehrman	
Woofie Ltd (Tanya Sarne)	
Old Oak & Park Royal Development Corporation (Old Oak & Park Royal Developmen...	<p>Thank you for providing the opportunity for the Old Oak and Park Royal Development Corporation to (OPDC) to comment on the St Quintin and Woodlands Draft Neighbourhood Plan. The OPDC was established on 1st April 2015 to drive forward the regeneration of Old Oak and Park Royal by capturing the opportunities presented by development of a High Speed 2 and Crossrail station at Old Oak Common in 2026. As you will be aware, the Mayor of London published the draft Opportunity Area Planning Framework (OAPF) for Old Oak & Park Royal in February 2015. This sets out further guidance for how the London Plan's target of 24,000 new homes and 55,000 new jobs in Old Oak with 1,500 new homes and 10,000 new jobs in Park Royal will be delivered. The OAPF is envisaged to be adopted by the Mayor in the autumn. Following this, the OPDC's own draft Local Plan will be published in the winter for consultation. The OPDC is committed to ensure that the communities in and around its area benefit from the opportunities generated by the transformation of the area and impacts are mitigated. It looks forward to continued engagement with the St Quintin and Woodlands Draft Neighbourhood Forum.</p>
Rolfe Judd (John Osborn)	

<p>RBKC (Cllr Robert Thompson and Cllr Bakhtiar and Cllr Healy)</p>	<p>Dear Planning Department at present I am writing on behalf of myself and Cllr Bakhtiar. Cllr Healy is copied in and may well want to add her name to these comments.</p> <p>As Ward Councillors in Dalgarno and St Helen's wards we wish to strongly support the main thrust of the proposals as outlined in the St Quintin and Woodlands Draft Neighbourhood Plan. As local councillors we believe that that plan offers a firm basis on which to address the particular planning needs of our communities in order to help maintain their diversity and the vitality of our local life.</p> <p>In particular we welcome:</p> <ul style="list-style-type: none"> a. the emphasis on the conservation of the character of the area b. the strong concern to protect local shops and amenities c. the preservation of our remaining open spaces and backlands as green spaces <p>As local councillors we have been very heavily involved in the the public meetings that have been held in the formation of this plan. We have been very impressed with the skill, dedication and attention to detail of those who have led the Forum. In particular we have welcomed their emphasis on thinking creatively about the issues that need to be addressed in the wards, and how the Local Plan could be adapted in our areas, not only to protect the present quality of life of our residents, but also to meet some of the wider objectives of the Local Plan for the Borough as a whole. This creative and constructive outcome has been undertaken in a thorough, lively and democratic way, over a long period to time, at many extremely well attended public meetings, and in the previous consultations. We believe it is now time that the main recommendations of the Draft Neighbourhood plan be implemented in order to ensure a dynamic quality of life for all of our residents.</p>
<p>Susan Wilson Gretton</p>	
<p>Doreen Pickard</p>	
<p>Amnah Shafi</p>	
<p>Matthew & Elizabeth Shaw</p>	<p>We are writing to you regarding the St Quintin and Woodlands Neighbourhood Plan.</p> <p>As a resident of Kelfield Gardens, we strongly support the proposed change regarding rear roof alterations (Section 2.3.1).</p> <p>The rear of our home overlooks Wallingford Ave, Kingsbridge Rd and Highlever rd. We can see dormer windows on the majority of properties and it seems unfair that we are not allowed to extend our own home in the same manner, even though our neighbour two doors down does have a dormer so the roof line is already broken.</p> <p>Furthermore, it is hard to see how this continued restriction in one section of our street 'preserves or enhances the character of the conservation area' as rear dormers are not visible from the street. We agree that front roof alterations should not be allowed but cannot see the logic in continuing to restrict extensions at the rear.</p> <p>We have discussed this matter with many of our neighbours who all agree that this level level of inconsistency is unfair and deserves to be changed.</p> <p>I therefore hope you will give proper consideration to the plan and amend the existing planning policy accordingly.</p>

CGMs Consulting (John Mumby)	<p>Assessment of Demonstrating the LGS Designation</p> <p>Looking at the three tests in the Framework, it is agreed that the Clifton Nurseries site meets the third bullet point. Consequently, the proposed designation thus hinges on the first and second points. The Framework test of the first point is whether it is in close proximity to the community it serves. Therefore, it has to be geographically close and serve the community.</p> <p>Put simply, the land does not 'serve' the community. It is a private commercial enterprise with no access to the general public and has been so for a number of decades. The StQW Forum submitted a nomination to have the site designated as an Asset of Community Value in 2014 which was rejected by RBKC on the 4th August 2014 with the reason given as:</p> <p>'The Clifton Nurseries site is not currently, nor in the recent past has it been, in a use that furthers the social wellbeing or social interests of the local community. The definition of land of community value as set out in Section 88 of the Localism Act 2011 is therefore not satisfied and the nomination is refused'.</p> <p>There are a small number of views of the land from outside of the houses that immediately back onto it (a very small proportion of the number of dwellings in the NP area) and thus provides limited visual amenity to the wider area or the community. Overall it has limited significance to those living in the area covered by the draft NP. The site does not serve the local community and its proposed designation does not have regard to Para 77 of the NPPF.</p> <p>The Framework test on the second point is that the land subject to the proposed designation is 'demonstrably special.' It is therefore up to a neighbourhood plan Qualifying Body to demonstrate that a proposed LGS designation holds a particular significance.</p> <p>Before providing commentary on the draft NP itself, it is worth looking back on the designation of the StQW Neighbourhood Forum and the circumstances surrounding the LGS proposal.</p> <p>The information available on the RBKC website includes the Application for the StQW Neighbourhood Forum and also the consultation responses received to the application for the creation of the Forum (mid 2012). The Application, with contact details given as the St Helens Residents Association, sets out the logic for defining the area for planning purposes and includes, inter alia, reference to the Latimer Road Employment Zone, as well as the North Pole Road / St Helens Gardens retail area. Notably, it does not include any reference to any of the sites cited in the plan as appropriate for LGS designation. In addition, the consultation responses to the application, which comprises 28 responses, has only one reference to the protection of open space and 'backlands'.</p> <p>Neither of the documents refers specifically to the Clifton Nurseries site, which could lead to the question of whether the nurseries site is so demonstrably special to the local community that it warrants a LGS designation, given this was not highlighted at this important early stage. It is worth noting here that both of the above documents were prepared prior to the nurseries site being put on the market, following which, the priorities of the Neighbourhood Forum appeared to change.</p> <p>Turning now to the draft NP, as stated above, the test in the Framework is that the land subject to a LGS nomination has to be 'demonstrably special', with examples of criteria given in para 77 of the Framework.</p> <p>Annexe 3 of the draft NP provides commentary on why the LGS designation should be made. The Forum have undertaken commendable detailed research into the history of the site, covered in paras C.4.1 to C.4.13 of the draft Plan. Para C.4.14 is commentary on a current application to develop the site.</p> <p>Paras C.4.15 to C.4.17 consider whether the land is Previously Developed Land (PDL), however the fact of whether the site is PDL is not a land use policy designation, nor is a consideration of LGS designation. Paras C.4.18 to C.4.20 subsequently provide commentary on the policy position in terms of the, now old, Conservation Area Proposals Statement.</p> <p>It is only at para C.4.21 that the draft NP starts to seek to demonstrate the site is so special as to require a LGS designation. Notably, there is limited commentary on this point within the draft NP, simply stating that the backland sites make an important positive contribution to the conservation area, and that their long-term protection from development should be considered in this context. Note here that protection from development is not a criteria offered as an example by the NPPF for designating a LGS, indeed resisting development is contrary to the Framework guidance on NP making. Reference to providing amenity is stated by the draft NP, but no assessment of why this is so special to identify the site as LGS.</p> <p>The following paras (C.4.22 to C.4.26) refer to Bio-diversity and Wildlife. Again, here there is a lot of general information and it is stated that there are a number of species 'seen' at site. No evidence to support this statement is provided. It is noted that the current application for residential development is supported by an Ecological Appraisal which concludes that there is no indication that there are any ecological constraints affecting the site, subject to appropriate mitigation measures. There is no reason to question the conclusions of the Appraisal as it is the most detailed assessment undertaken on the ecology / bio-diversity at Clifton Nurseries. There is no substantive evidence contrary to this Ecological Appraisal.</p> <p>The draft NP then seeks to conclude on why a LGS designation is warranted. The first bullet point refers to the site being close to the community it serves. Commentary on this is provided above, questioning whether the site provides any service to the whole community. The 2nd and 3rd bullet points are merely facts. The fourth bullet point refers to visual amenity and tranquillity, with no further explanation of why.</p> <p>The fifth bullet point refers to its contribution to the context of the surrounding terraces. Again, no justification is provided. This seems a departure from para C.4.21 which refers to impact on the conservation area. The Clifton nurseries site is afforded very few glimpses from the public realm and therefore it is questioned whether it does in fact make an important contribution to the character, townscape and setting of the surrounding terraces.</p> <p>Whilst parts of the site can be seen from the rear upper floors of the terraces surrounding it, setting and context should be considered in respect of the wider area. Occasional fleeting glimpses of the commercial storage site from the public realm are not so significant that the land should be classified as a LGS. Especially given that the 'test' relates to demonstrating that a site / land is demonstrably special with regard to beauty or historic significance.</p> <p>The 6th bullet point references the willows, however it is clear that the presence of willow trees (which have limited life expectancy) does not mean land is so special to warrant a LGS designation. The last bullet point is again a statement of fact.</p> <p>In summary, there is nothing in Annexe C to demonstrate why the Clifton Nurseries site is so special and holds local significance. Indeed it is a principle of neighbourhood planning that it should plan positively to support local development rather than seek to delay or prevent it. It is a requirement of the producers of any Neighbourhood Plan to demonstrate why a site / space is demonstrably special to the community it serves to warrant a LGS designation, where the Framework notes that it should only be classed as such in 'very special circumstances'. The draft NP includes 2, possibly 3, sentences in the Annexe C (paras C.4.21 and part of para C.4.25) to seek to justify such a designation. Even these are flawed. There is simply not enough information here to justify the exceptional designation of LGS.</p> <p>As an addition, I wish to add here commentary on paras C.4.32 to C.4.36 which comments on potential future use of the land at Nursery Lane. In terms of the draft NP, the nurseries site has to be taken 'as is'. A LGS designation should not be applied on the basis that another use could come forward given there is no guarantee of a change of ownership or the granting of other necessary consents / permissions to secure an alternative use.</p> <p>The site is currently in use as a commercial enterprise, Clifton Nurseries, a use that has been running for a number of decades. The site use is associated with activities elsewhere and is a depository and contractors stores where there are regular deliveries to load or unload equipment and plants. The site includes small scale buildings associated with this use, as well as greenhouses and a purpose built track to allow vehicles to move around the site. This use is as a commercial depot and storage site and given the bespoke nature of the uses it has a sui generis use. Such a use is not restricted to any one specific operator.</p> <p>A LGS designation provides protection from development akin to Green Belt / Metropolitan Open Land, accordingly, not only would such a development prevent any sustainable development, but such a designation would significantly hamper the future operation of the premises were a nursery occupier to seek to grow it's operation and increase activity, or require new structures at site. The Framework seeks in it's Core Planning Principles to promote business that the country needs, as well as the RBKC Core Strategy Policy CO2 noting a desire for the Borough to be enhanced by commercial uses which can significantly contribute to the well being of residents.</p> <p>A designation of the premises as a Local Green Space would thus 'sterilise' the site in terms of any possible future development (however small) including one that sought simply to enhance the commercial activity currently undertaken. A designation would therefore be contrary to the Framework and RBKC's Strategic Planning Policies. Furthermore, it is not understood how the site in its current use could possibly comprise a Local Green Space (notwithstanding the fact that its proposed designation fails the basic conditions) and there is no indication that any resources exist to purchase the site, remove Japanese Knotweed, and redevelop it into, say, a tranquil, recreational area. Such an aspiration is in the realms of fantasy.</p>
West London Bowling Club Co Ltd (James Tocher)	

Natural England, (Sally Harries)	
Transport for London (Tom Jolley)	<p>Many thanks for the opportunity to comment on the St Quintin and Woodlands draft Neighbourhood Plan.</p> <p>Firstly, please note that these comments represent the views of Transport for London (TfL) Borough Planning officers and are made entirely on a "without prejudice" basis. This response covers TfL as a statutory consultee and does not relate to sites in which TfL have a commercial property interest. Furthermore, they should not be taken to represent an indication of any subsequent Mayoral decision and they do not necessarily represent the views of the Greater London Authority (GLA). Any views or opinions are given in good faith and relate solely to transport issues.</p> <p>For the most part we have no comments on the draft Neighbourhood Plan and are supportive of the Forum's intention that the Plan should address traffic and transport issues. However we would like to make the following specific points:</p>
Ian Sneddon	<p>I am responding to the consultation exercise on the above. I am the owner of the St Quintin Garage at 142a Highlever Road, which is a site proposed in section 10 of the Draft Plan to be allocated for future housing development.</p> <p>I support this proposed site allocation. The St Quintin Garage was opened in 1918. Planning conditions have always meant that I cannot use signage to advertise petrol sales, so the level of such sales has always been low and customers have mainly been those using the lock up garages on the site.</p> <p>The business of the garage workshop I intend to carry on in the short term, but it is realistic to consider the site at 142a Highlever Road as being developed for housing within 5 years, as I am of retirement age. Given that the site is now surrounded by housing on all sides, and the planning condition preventing advertising the presence of the petrol pumps, long-term use as a petrol station would seem unviable.</p>
RBKC (Patricia Cuervo)	
RBKC (Joanna Hammond)	<p>The plan would benefit from an executive summary at the front detailing each of the policies for ease of reference.</p> <p>Annex B B2.2.2 These new policies can be found in the Local Plan. B.7.2 The Council's policies are not inconsistent, the Neighbourhood Plan seeks to establish specific policies for the</p>

<p>London Borough of Hammersmith and Fulham (Trevor Harvey)</p>	<p>Thank you for the opportunity to comment on the submission version of the St Quintin and Woodlands Draft Neighbourhood Plan. I apologise for missing the 17th July deadline, but hope you find these comments useful.</p> <p>This council has made comments on earlier versions of the Plan and is pleased to see that the neighbourhood area boundary is clearly drawn and does not allow for misinterpretation of the extent of the area. We are also pleased to know that widespread consultation has been undertaken by the Forum.</p> <p>Our comments on the submission version are set out below:</p> <ol style="list-style-type: none"> 1. Delete from first sentence of para 0.1.7 the following words "(not through any fault of RBKC)". This comment is unnecessary in the context of this paragraph and the document as a whole. 2. Amend third sentence of para 0.1.7 to read "(for which no body or group has, as at the date of publication of this submission StQW neighbourhood plan, since come forward with proposals to prepare a neighbourhood plan). This change is required to ensure the existing comment does not become out of date, should the situation change. 3. Para 0.1.9 would benefit from redrafting, for example along the lines of: "The extent to which neighbourhood plans can influence major infrastructure change is limited. Such change in this part of London is being determined largely by higher level plans (the London Plan, the Old Oak and Park Royal Development Corporation, the GLA/LBHF Opportunity Area Framework for White City, the Local Plans of RB Kensington & Chelsea and of LB Hammersmith & Fulham, and the GLA/LBHF Opportunity Area Framework for White City. The establishment of the Old Oak and Park Royal Development Corporation will result in an additional Local Plan for this part of London". 4. Para 0.2.3 should refer to the "Old Oak Common Opportunity Area". 5. It is suggested that the Old Oak and Park Royal Development Corporation comment on para 0.2.6. 6. Paras 0.2.10 and 0.2.11. Transport for London are developing a transport strategy for the OAPF which will aim at minimising the amount of travel by private motor vehicles and maximising the numbers and proportions of journeys made on foot, by bicycle and public transport. The strategy will include very limited amounts of car parking, a comprehensive and attractive network of pedestrian and cycle routes, and excellent public transport links, including interchange stations with the North and West London Lines, so that the area will have one of the highest levels of public transport accessibility. There will be some improvements to road links and junctions, but these will be carefully designed so as not to attract extraneous traffic to the area. In addition, each development will have to produce a comprehensive Transport Impact Assessment to show what mitigation measures will be taken . 7. Policy 5a): LBHF is not opposed in principle to the proposed Overground station beneath the Westway roundabout, but it is not a priority for the council and therefore we cannot take the lead in progressing the proposal. If another body were to undertake feasibility studies for the station, we would co-operate with them as far as is reasonably practicable. 8. Action 5i). The North Pole Road/Scrubs Lane/Wood Lane junction is in LBHF, although signal timings are controlled by TfL. Any proposed mitigation measures would need to be agreed with LBHF and we would need to be assured that such measures would not simply increase traffic in the area. Action 5ii). We welcome the plan's support for the proposed pedestrian and cycle underpass between Latimer Road and Imperial West. 9. Regarding the map in para 11.1.1, it is considered inappropriate to show the facilities in LBHF on the map. This area is not within the designated neighbourhood plan area. In addition, the map identifies a pub - surely there are similar facilities (such as pubs) within parts of RBKC that lie outside of the neighbourhood plan area and which should be shown on the map if it is considered necessary to show the pub in LBHF. <p>Please come back to with any queries concerning these comments.</p>
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<p>The Kensington Society (Amanda Frame)</p>	<p>Kensington Society response to the Draft St Quintin and Woodlands Neighbourhood</p> <p>The Kensington Society was formed in 1953 to promote good architecture and planning in Kensington. The Kensington Society has over 700 members and 27 affiliated societies which include both StQW Forum and the St Helens Residents Association. From our very inception we have been active in planning issues within the Royal Borough of Kensington & Chelsea.</p> <p>We support the rights and powers to allow our local communities to shape new development as outlined within the Localism Act. The Society strongly supports the proposals within the St Quintin and Woodlands Neighbourhood Plan.</p> <p>It is clear from the Consultation Statement accompanying the Draft Plan that its proposals reflect extensive discussion and consultation amongst local residents in this part of the Royal Borough. The draft policies are positively prepared and strike an appropriate balance between the need for new housing units and employment opportunities, while ensuring that the heritage and conservation assets of the neighbourhood are not harmed. Insofar as certain of these policies involve some variation on 2010 RBKC Core Strategy policies, the level of variance is modest and is evidenced and justified within the Draft Plan document and the Basic Conditions Statement.</p> <p>Having reached this stage, we would expect the Council from now onwards to give material weight to the draft policies in the Plan when determining applications within the designated neighbourhood area, with such weight increasing as Draft Plan progresses to a referendum, in accordance with CLG Planning Practice Guidance 007 on Neighbourhood Planning.</p> <p>Neighbourhood planning has now become well established across England, as part of wider efforts to reform the national planning system and as such, we have asked the Council to recognise this process. The new Government has announced its intent to streamline the neighbourhood planning process further via measures in the proposed Enterprise Bill.</p> <p>In a borough with very high land values, local residents (and amenity bodies such as the Society) are faced by a planning system which increasingly appears to be weighted towards commercial interests. The huge potential profit margins from development within this part of London allow applicants to spend heavily on consultants, and to pursue serial planning applications and appeals if rebuffed first time round. Local resident and amenity groups have no equivalent financial resources. The playing field is far from level.</p> <p>In such a context, we believe that the Council needs to be proactive in bringing together developers and local residents and amenity bodies at an early stage. Current arrangements within RBKC for pre-application advice too often lead to schemes being prepared without input beyond the Planning Department, which means that the aspirations of the local community are not reflected in what is sought by the Council. What little local consultation is too little, too late. This reinforces the more adversarial, and least productive, features of the UK planning system, adding to abortive design work and wasted consultancy input on applications, and to extra costs and delays in achieving sustainable development on the ground.</p> <p>As made clear in the NPPF, neighbourhood planning offers scope for a 'plan-led' approach to development which can respond faster to changing environments and market conditions. It can also reduce public distrust and cynicism in the planning process and build closer dialogue between the Council and its citizens. We see the StQW Neighbourhood Plan as an example of a sustained effort by residents to achieve these results. Unfortunately the RBKC Planning Department seems hitherto to have been lukewarm at best.</p> <p>Other comparable boroughs such as Westminster and Camden seem to have taken a more positive approach, as evidenced by the much larger numbers of neighbourhood forums which have been designated in these two boroughs.</p> <p>Whether or not further proposals for neighbourhood plans come forward in Kensington and Chelsea remains to be seen. Groups who have expressed some initial interest will no doubt wait to see how the StQW Neighbourhood Plan, as one of the first in London to propose specific site allocations and designations alongside relevant policies, fares at examination. We hope that the Council will be signalling a more positive approach to neighbourhood planning, at the examination stage.</p> <p>Some of the broader principles of neighbourhood planning, of encouraging earlier and meaningful dialogue between landowners, developers and local residents, could be progressed by the Council through other routes. The Kensington Society is working with its affiliate bodies over the coming months, to explore practical means of achieving this outcome.</p>
<p>Historic England (David English)</p>	<p>St Quintin and Woodlands Draft Neighbourhood Plan Submission Version (June 2015)</p> <p>Further to our letters dated 19th January 2015 and 15th May 2015 (attached below) responding to earlier drafts of the Neighbourhood Plan, we are pleased to offer the following advice.</p> <p>In our previous letters we welcomed the creation of this Neighbourhood Plan, while raising concerns about the evidence base being used to justify some of the policies relating to conservation. These concerns were resolved through reference to up-to-date background evidence produced by the Council, which supported some of the policies in the Neighbourhood Plan which hitherto appeared to conflict with existing Council policies.</p> <p>With regard to the new policies 4b and 4c we note that the justification rests in part on the evidence contained in the Council's 1990 Conservation Area Proposal Statement (CAPS). As we previously indicated a robust and up-to-date evidence base is necessary for conservation policies to be justified and effective. Given the limited weight that can be given to the CAPS document due to its age, we welcome the additional work included in Appendix C carried out by the Neighbourhood Forum that seeks to justify these policies. In our view it is regrettable that the contribution that these backland areas make to the Oxford Gardens Conservation Area has not been subject to recent review by the Council as part of their review of conservation area appraisals, or by local residents using a structured approach in line with our Understanding Place guidance documents. Both types of review would have provided robust support for these policies.</p> <p>Nevertheless we consider that a case has been made for the policies that seek to conserve the backland sites as open spaces. In line with the Council's CAPS document the additional evidence in the Neighbourhood Plan suggests that these backland sites have been, and remain, important features that contribute to character of this part of the Oxford Gardens Conservation Area. We also consider that the evidence in the Neighbourhood Plan could make a valuable contribution to the forthcoming review of the conservation area appraisal.</p> <p>It must be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this Neighbourhood Plan, and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your Plan.</p>
<p>Alan Rivers</p>	
<p>David Marshall</p>	<p>Re: Nursery Lane Site, London W10</p> <p>I am a Chartered Surveyor living in Finstock Road and I am writing in support of the Nursery Lane Site being confirmed as a Local Neighbourhood Asset.</p> <p>I know that the residents of North Kensington, especially those on the St. Quintin Estate, believe that what remains of the open space known as the Nursery Gardens Square have always planned that it should be a community open space and the Legard Family developing their Estate in the early part of the 20th Century</p> <p>In recent years it has become an inaccessible community asset, having recently been used as a nursery garden.</p> <p>It was only after several years of abortive planning applications that a loophole of compassion allowed the RBKC to give planning consent for community sheltered housing at the southern end of this site. This took up,</p>

	<p>including the road space, nearly 2/5ths of the planned communal garden but was an unexpected windfall for the Legard Family as no doubt they received a price well above agricultural value at that time. Agricultural value in today's terms by the way is about £10,000 per acre.</p> <p>The substantially reduced space is now being available for sale by the Legard Family who have been advised that there is a faint chance that a small part of this site might be available for open market housing development. This of course should not be allowed, especially as there is an abundance of open market houses in the area at present. What is important though is that this open space should remain as open space, as a community asset and if the Legard Family wish to sell it then it is highly possible they might receive a price above agricultural value since the community of house owners around the space would like to buy it and use it as an open community garden square along the lines of Mapesbury Dell at Walm Lane in Cricklewood (www.mapesbury-dell.org)</p> <p>It might well be possible for the Legard Family to get a little bit more money if the RBKC took the opportunity to upgrade or even enlarge the sheltered housing which they own and by creating a direct access covered way across the road to the square garden. This would be in keeping with the declared aspirations of the RBKC Cabinet which is to upgrade social and welfare assets. If in addition a conservatory/summer house could be built near the sheltered housing for the use of the residents this would be an inspirational achievement by our council.</p> <p>The position in the sheltered housing for social, meeting, interchange and chit-chat is rather limited by the design of the building and the inward looking gardens which are rather overlooked. If the residents were given the opportunity to share the delights of enjoying the community garden with a route to such a summer house they would be able to sit in the sun and watch and mingle with the community and local families as they pass by, play and picnic. This would be hugely restorative delight and would also be so much nicer for visiting families and friends to sit in the sun with their older family members and watch their grandchildren play. This is a very serious suggestion and we hope that our councillors take it fully to heart. It might indeed be possible for Octavia Hill, who do lead in Kensington with sheltered housing, to be able to suggest ways of further developing sheltered housing.</p> <p>A combined offer from the Borough linked to the generous and realistic offer from the surrounding community of houses would provide a price well above any conceivable agricultural price.</p> <p>It means that the Legard Family will be extremely pleased to accept such a combined offer and would be able to take great pride and satisfaction in writing the final pages in the successful development of the St. Quintin Estate with this last piece of unfinished business and finally the square could be named "The Legard Family Community Garden Square".</p>
<p>Judy Fox Antiques (Judy Fox)</p>	<p>I am responding to this consultation as the owner of Unit 4, Latimer Rd.</p> <p>I do support the points made in the St Quintin and Woodland draft neighbourhood plan, about the fact that Latimer Rd, having failed to achieve its potential as part of an Employment Zone.</p> <p>Poor public transport access and lack of facilities for employees has proved hard to attract retain employment activity.</p> <p>Having seen the plans and ideas for the scope of redevelopment of Units 1-14 , adoption of the draft plan of St Q.and Wdl. would really help the regeneration of Latimer Rd, as it has always been of mixed use with housing as well as commercial activity.</p> <p>Allowing residential use above commercial activity would be a step forward, in line with the direction of the National Planning Policy framework and its encouragement of mixed use development in suitable locations.</p>