

To: planningpolicy@westminster.gov.uk

Consultation response to the Modifications to the City Plan

Re: MM40

Our Forums submitted a joint letter prior to the City Plan hearings requesting that the following language in Policy 41.11, here in boldface, be removed: ***"In such cases we will require that extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement"***. We provided multiple reasons why requiring simultaneous implementation across a complete terrace would render hundreds of upward extensions across Westminster virtually impossible to achieve.

This policy, although modified elsewhere, still requires ***"that extensions across the whole terrace group to be implemented at one time and this may be secured by legal agreement."***

WCC's comment at the City Plan hearings was that this condition has been successfully imposed before; however, it was unclear how many properties were involved in these cases, or whether they were jointly or individually owned or part of a commercial development. Regardless, a successful implementation in the past doesn't make it a good policy or one that will further Westminster's goals for more or better housing.

Instead, because it is **highly** unlikely that dozens of individual owners, or even a few would be able to finance their mansard extensions at exactly the same time, this policy will translate into missed opportunities across the City to provide high quality 2-3 bedroom upper level maisonettes or extended family accommodation.

According to our count, in the Notting Hill East Forum area the number of properties that could be blocked from having mansards by this condition is 48 across 6 terraces, ranging in size from 4 to 24 houses. In Maida Hill, 394 properties across 33 terraces, ranging in size from 4 to 32 houses. In Pimlico, 58 across 5 terraces, ranging in size from 5 to 20 houses. Across Westminster, the affected properties would be in the many hundreds if not over a thousand.

Further, at the hearings, WCC said that the preservation of townscape character was of paramount importance when considering roof extensions. We all want to preserve the essential and individual character of our conservation areas but this can be achieved by adhering to design guidance in Neighbourhood Plans, local design guides and WCC's own *Roofs: A Guide to Alterations and Extensions on Domestic Buildings 2004*. (although as we wrote before, we suggest this document is updated to include current design, technological and environmental considerations).

If Westminster is unwilling to eliminate the simultaneous implementation condition, we suggest the following modifications to the wording:

Change ***"we will require extensions across the whole terrace group to be implemented at the same time..."*** to ***"we will normally expect extensions across the whole terrace group to be implemented at the same time."***

This allows exceptions where it can be argued that simultaneous implementation (because of the number of properties involved) would be impossible to achieve, or where the re-balancing of the street would make such an improvement to the townscape character that it would be worth waiting for the entire terrace to be filled in, or where there would be a beneficial increase in housing space.

We also suggest that this sentence could be added to provide increased assurance that the design would be acceptable:

*"All applications, whether submitted by individuals or groups of property owners in the terrace should be considered in light of policies set out in the relevant Neighbourhood Plan, specific local design guides, as well as **Roofs: A Guide to Alterations and Extensions on Domestic Buildings**. Any incremental implementation should normally be part of a group application with the consented design controlled by condition."*

Without these changes, we feel that this policy will effectively block mansards and housing expansion in hundreds of properties across the borough.

Yours sincerely,

NOTTING HILL EAST NEIGHBOURHOOD FORUM
FITZ WEST NEIGHBOURHOOD FORUM
MAIDA HILL NEIGHBOURHOOD FORUM
PIMLICO NEIGHBOURHOOD FORUM