

# Phase 3 Objections

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## 3 Different Versions:

[Phase 3 Problems \(TL;DR\)](#)

[Extended Version](#)

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## Phase 3 Problems (TL;DR)

- Too many existing mature trees will be lost. Proposed replacements are inadequate.
  - Insufficient new tree planting proposed, especially large, broad-leaf varieties like London planes, limes, beech, maples.
  - Loss of biodiversity and wildlife habitat from reduced mature tree coverage.
  - Increased urban heat island effect due to insufficient tree canopy coverage.
- Insufficient quality and quantity of play spaces and open spaces
  - Lack of genuine consultation with residents on open space design
  - Potential issues with wind, overshadowing, and lack of greenery in some spaces like the 'courtyard garden' and 'neighbourhood garden'.
  - Roads unnecessarily dividing up children's play areas.
  - Many small disconnected open spaces instead of one integrated "place".
  - Athlone Gardens park should be connected to the play space at the northern end via people-prioritised streets to create a safe and continuous open space for children.
  - The co-design process beyond just the park to the surrounding public realm.
  - Dedicated cycle infrastructure and parking for bikes, e-bikes, scooters be maximised.
- 15-storey tower will cause overshadowing and divide spaces. It exceeds the 9-storey height guidance by more than 50%.
- The development should not result in any increase in on-street parking. All new and replacement parking should be provided off-street.
- Ensure timely completion of the community centre and park with enforceable mechanisms
  - Separation of the community centre/ adventure playground from the park creates a traffic safety hazard for children crossing Portobello Road.

## Extended Version

- Significant removal of existing mature trees without adequate replacements

- 31 mature trees proposed for removal in just Phase 3 in addition to the 40 previously removed under the outline planning permission.<sup>1</sup> The overall development has led to a net loss of tree amenity valued at £22.7 million based on CAVAT calculations<sup>2</sup>
- Insufficient new tree planting proposed of only around 100 trees across all phases, contrary to London Plan policy G7.<sup>3</sup> Most proposed trees are small ornamental varieties rather than large, broad-leaf species like London planes, limes, beech, maples, sycamores, chestnuts, oak, false acacia which provide maximum environmental benefits.<sup>4</sup>
- Loss of biodiversity and wildlife habitat, as mature trees support far more species than newly planted trees - oak trees can support up to 2,300 species with over 300 of these entirely dependent on oaks for their survival<sup>5</sup>
- Air quality data showed Wornington Green in 95th percentile<sup>6</sup> for high pollution levels, which could worsen with fewer mature trees. This has traumatic impact on the residents:
  - RBKC overall experiences poor air quality, with mortality attributable to long-term exposure to particulate matter (PM2.5) estimated at 48% above the UK average.<sup>7</sup>
  - Golborne Ward, in the Royal Borough of Kensington and Chelsea, is significantly deprived. The Index of Multiple Deprivation (IMD, 2007) shows Golborne to be among the 10% most deprived wards in England<sup>14</sup>, also scoring in the lowest 10% for children living in income deprived households.<sup>8</sup>
  - Deprived communities suffer greater burdens from air-pollution-related death and sickness. As highlighted in the 2010 Marmot Review, individuals in deprived areas experience more adverse health effects at the same level of exposure compared to those from less- deprived areas.<sup>9</sup>
  - Asthma rates among children aged four and five fell by a quarter for every additional 343 trees per square kilometre.
  - People living in urban areas with greater amounts of green space show significantly lower mental distress and significantly higher wellbeing.<sup>10</sup>

<sup>1</sup> 2010 outline plan permission. Difference in the Arboricultural Impact Assessment submitted as part of Phase 3 (31 Trees) and the Planning Statement (29 Trees)

<sup>2</sup> <https://www.worningtontrees.com/value-of-trees-lost-cavat.html>

<sup>3</sup> London Plan: G7, Part C: "Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by a suitable tree valuation methodology."

<sup>4</sup> London Plan: G7, Part D: "The planting of additional trees should be included in new developments, particularly large-canoded species which provide a wider range of benefits, following the 'right trees for the right places' principle."

<sup>5</sup> [Earthwatch](#)

<sup>6</sup> Imperial College, 2023

<sup>7</sup>

[https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_rb\\_kensington\\_and\\_chelsea.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_rb_kensington_and_chelsea.pdf)

<sup>8</sup> [https://www.rbkc.gov.uk/pdf/Demographics\\_childdeprivation.pdf](https://www.rbkc.gov.uk/pdf/Demographics_childdeprivation.pdf)

<sup>9</sup> <https://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review>

<sup>10</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/>

- People who live within 500 metres of accessible green space are 24 per cent more likely to meet recommended levels of physical activity.<sup>11</sup>
  - If every household in England were provided with good access to quality green space it could save an estimated £2.1 billion in health care costs.<sup>12</sup>
  - 20.3% of residents in Golborne have a long-term limiting illness, compared to 12.3 per cent in Kensington and Chelsea and 14.1 per cent in London.<sup>13</sup>
  - The Local Plan acknowledges that 8.3% of deaths in RBKC are attributable to poor air quality – one of the worst metrics in London
  - Living sandwiched between the major thoroughfares of the Westway, Ladbrooke Grove, and mainline railway, Golborne residents are particularly vulnerable to effects of Nitrous Oxide and particulate matter.
- Insufficient quality and quantity of play spaces and open spaces
  - London Plan requires 10 sq metres of playspace per child, but playspaces are divided across disconnected areas rather than one cohesive space<sup>14</sup>
  - Lack of genuine consultation with over 500 resident families on designs
  - Potential wind issues in courtyard/neighbourhood gardens per studies
  - Overshadowing of open spaces not thoroughly analysed per BRE guidance
  - Limited greenery/vegetation indicated in courtyard garden renderings
  - Roads dividing children's play areas rather than one continuous carfree space. Separating centre/playground from park by Portobello Rd creates safety issue
  - Connect Athlone Gardens to northern playground via people-prioritised streets
  - Extend co-design process beyond just park to surrounding public realm
  - Need dedicated cycling infrastructure/parking for over 200 bikes/e-bikes
- 15-story tower exceeding the 9 story height in the approved outline plan, causing overshadowing
- Over 100 previous off-street parking spaces lost, against London Plan policy to restrict new on-street parking provision<sup>15</sup>
- No firm timelines or enforcement mechanisms secured for completing the re-provisioned community centre and full Athlone Gardens park after years of delays
  - Original Section 106 agreement allowed council to require "Default Park" by May 2018 if project stalled, now delayed to 2028

<sup>11</sup> <https://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>

<sup>12</sup>

<https://www.gov.uk/government/news/investing-in-nature-is-an-investment-in-the-nhs-says-environment-agency-chief-executive>

<sup>13</sup> <https://www.rbkc.gov.uk/pdf/Golborne%20Ward%20Profile%20web.pdf>

<sup>14</sup> Policy S4 states: "For residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 sq meters of playspace should be provided per child."

<sup>15</sup> London Plan T6.1/T6.3

# Letter Version

Dear Planning Officer,

We write to object to the current Phase 3 proposals for the redevelopment of the Worrington Green Estate for the following reasons:

## **Tree Removal and Replacement**

Our primary concern is the significant removal of existing mature trees across the site without adequate replacement. Specifically in Phase 3, 31 mature trees are proposed for removal, in addition to the 40 trees previously removed under the outline planning permission.[1] The cumulative impact is a staggering net loss of tree amenity valued at £22.7 million based on CAVAT calculations.[2]

The proposal to plant only around 100 new trees across all phases is woefully insufficient and contrary to London Plan Policy G7, which requires adequate replacement based on the value of trees removed.[3] Most of the new trees proposed are small ornamental varieties rather than large, broad-leaf species that provide maximum environmental benefits.[4]

The loss of mature trees will lead to devastating impacts on biodiversity and wildlife habitat. For example, a single mature oak can support up to 2,300 species, with over 300 entirely dependent on oaks.[5] Mature trees play a critical role in urban environments - their removal at Worrington Green puts our community at increased risk.

Air quality data showed the estate in the 95th percentile for high pollution levels in 2023.[6] With fewer mature trees, pollution absorption will decrease, worsening air quality and health outcomes for residents. This is particularly concerning given:

- RBKC overall experiences poor air quality, with mortality attributable to long-term exposure to particulate matter 48% above the UK average.[7]
- Golborne Ward is among the 10% most deprived in England, with 20.3% of residents having a long-term limiting illness compared to 12.3% across RBKC.[8][13]
- Deprived communities like Golborne suffer greater burdens from air pollution-related death and sickness.[9]
- The Local Plan acknowledges 8.3% of deaths in RBKC are attributable to poor air quality.

## **Open Space Quality and Quantity**

We have serious concerns about the insufficient quality and quantity of proposed play spaces and open spaces, which fail to meet policy requirements. While 1,933 sq metres of play space is provided, exceeding minimum levels, the spaces are disconnected rather than one cohesive area as envisioned by the London Plan.[14]

Moreover, the quality is severely lacking:

- There has been a lack of genuine consultation with over 500 resident families on the designs.
- Wind studies indicate potential issues in the courtyard and neighbourhood gardens.
- Overshadowing impacts on open spaces have not been thoroughly analysed per BRE guidance.
- Renderings show limited greenery and vegetation in areas like the courtyard garden.
- Rather than one continuous car-free play space, children's areas are divided by roads like Portobello, creating safety hazards.

We urge the applicant to connect Athlone Gardens seamlessly to the northern playground via people-prioritised streets to create an integrated public realm. The co-design process must also be extended beyond just the park to this surrounding area.

Finally, dedicated cycling infrastructure and parking for over 200 bikes/e-bikes must be incorporated, promoting active transportation.

### **Other Concerns**

The proposed 15-story tower clearly exceeds the 9-story height guidance in the approved outline plan and will cause overshadowing issues.

Over 100 previous off-street parking spaces have been lost, contrary to London Plan policies restricting new on-street parking provision.[15]

No firm timelines or enforcement mechanisms have been secured for completing the re-provisioned community centre and full Athlone Gardens park, despite years of delays. The original Section 106 agreement allowed council to require a "Default Park" by May 2018 if the project stalled, yet the park completion has now been pushed back to 2028.

For the reasons outlined above, the current proposals are unsatisfactory and fail to create a high-quality, sustainable living environment for residents as required by planning policy. We have tried to engage with the developer multiple times to address these issues in advance, to no avail. We urge you to reject this application and demand the applicant resubmits plans that properly address these issues.

Sincerely,  
[Your name]

### References:

[1] 2010 outline plan permission & Phase 3 application documents

[2] <https://www.worningtontrees.com/value-of-trees-lost-cavat.html>

[3][4] London Plan Policy G7 Parts C & D

[5] Earthwatch

[6] Imperial College 2023 data

[7] <https://www.london.gov.uk/air-quality-local-authority/kensington-and-chelsea>

[8][13] <https://www.rbkc.gov.uk/pdf/Golborne%20Ward%20Profile%20web.pdf>

[9] <https://www.instituteofhealthequity.org/the-marmot-review>

[14] London Plan Policy S4

[15] London Plan Policies T6.1 and T6.3