



New Local Plan Review
RBKC Five Year Housing Land Supply
and Stepped Housing Trajectory
October 2022



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Contents

| | |
|--|----|
| 1. Introduction----- | 1 |
| 2. Borough's Housing Need ----- | 2 |
| 3. Borough's Housing Target ----- | 3 |
| 4. Stepped Housing Trajectory Rationale----- | 3 |
| London Plan | 3 |
| PPG on Housing Supply and Delivery | 4 |
| Unique nature of the Borough..... | 4 |
| Opportunity Area Sites | 5 |
| Strategic Housing Land Availability Assessment (SHLAA) 2017 | 6 |
| Remaining sites in the SHLAA..... | 7 |
| Call for sites..... | 7 |
| Housing Delivery Test Action Plan | 7 |
| Protection of other uses in the borough..... | 8 |
| 5. Housing Trajectory ----- | 12 |
| 6. Stepped housing trajectory----- | 16 |
| 7. Five Year Housing Land Supply (2022/23 to 2026/27)----- | 18 |
| 8. Years 6 to 10 (2027/28- 2031/32) and Years 11 to 15 (2032/33 – 2036/37) ---- | 21 |
| 9. Past undersupply in the borough ----- | 29 |
| | |
| Appendix 1 Housing Trajectory Summary Table ----- | 30 |
| Appendix 2 Desktop Assessment of potential Class E to Residential change of use outside of the Article 4 Direction Area ----- | 31 |

1. Introduction

- 1.1 The National Planning Policy Framework (NPPF)¹, (paragraph 68) requires that *“Planning policies should identify a supply of (a) specific, deliverable sites for years one to five of the plan period²; and (b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*
- 1.2 The NPPF Annex 2: Glossary has a specific definition for deliverable and developable sites. These are set out in full in section 5 of this paper.
- 1.3 Paragraph 74 of the NPPF further specifies that, *“strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies³, or against their local housing need where the strategic policies are more than five years old⁴.”* The paragraph then goes on to specify an appropriate buffer (moved forward from later in the plan period). The appropriate buffer for the Borough is 20 per cent⁵ due to the failure to meet the Housing Delivery Test in 2021. The delivery was 43 per cent as opposed to 85 per cent.
- 1.4 This paper sets out:
- A) the Borough’s housing trajectory addressing the requirements of paragraph 68 and 74 of the NPPF. The housing trajectory will be updated annually and submitted as part of the New Local Plan Review (NLPR) for examination in due course.

¹ Last updated 20 July 2021

² Footnote 34 of the NPPF – *“With an appropriate buffer, as set out in paragraph 74. See Glossary for definitions of deliverable and developable.”*

³ Footnote 38 of the NPPF – *“For the avoidance of doubt, a five year supply of deliverable sites for travellers – as defined in Annex 1 to Planning Policy for Traveller Sites – should be assessed separately, in line with the policy in that document.”*

⁴ Footnote 39 of the NPPF - *“Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.”*

⁵ Paragraph 74 (c) of the NPPF – *“20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*⁴¹ Footnote 41 of the NPPF *““This will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.”*

B) It provides justification to use a stepped housing trajectory as set out in Policy HO1 of the NLPR, in accordance with the guidance set out in Planning Practice Guidance (PPG) on Housing Supply and Delivery⁶.

2. Borough's Housing Need

- 2.1 The London Plan 2021 has identified the housing need for 66,000 additional homes per annum across London (paragraph 4.1.1). Paragraph 4.1.2 of the London Plan clarifies that *"Because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment⁷ but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA."*
- 2.2 The standard method for calculating housing need is set out in the PPG on Housing and Economic Development Needs Assessment⁸. A 35 per cent cities and urban centres uplift was added to the method in December 2020. However, the PPG (paragraph 34) provides specific guidance for London. It states *that "an uplift applies in London. London is unique in that it has no single city centre which can carry need for the city area. Therefore a 35 per cent uplift is applied to the entire SDS⁹ area (which covers all the London boroughs), rather than to the local authority which contains the largest proportion of London's population. However, **it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.**" (emphasis added)*
- 2.3 The Government response to the consultation "Changes to the Current Planning System"¹⁰ which led to the change in the standard method, made this even more explicit and stated that, *"It is clear that in London, in the medium term, there will need to be a much more ambitious approach to delivering the homes the capital needs. The Secretary of State for Housing, Communities and Local Government expects to agree the London Plan with the Mayor shortly. **This new plan, when adopted,***

⁶ <https://www.gov.uk/guidance/housing-supply-and-delivery> (paragraph 21)

⁷ Footnote 41 of the London Plan – *"Where boroughs wish to commission their own research on housing requirements to complement the London-wide SHMA, they are encouraged to do this on a sub-regional rather than single-borough basis."*

⁸ <https://www.gov.uk/guidance/housing-supply-and-delivery>

⁹ Spatial Development Strategy i.e. the London Plan

¹⁰ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

will set London’s housing requirement for the next 5 years. The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed.
(emphasis added)

- 2.4 Therefore, in-line with national policy set out above, the NLPR uses the housing need and its distribution as set out in the London Plan. There is a legal requirement to be in general conformity with the London Plan.

3. Borough’s Housing Target

- 3.1 The Borough’s housing target as set out in the London Plan 2021 is 4,480 homes over ten years. The previous target was 7,330 homes over the same period which was annualised to 733 homes per annum. The previous target was introduced through the Further Alterations to the London Plan in 2015.

4. Stepped Housing Trajectory Rationale

- 4.1 A stepped housing trajectory is supported in certain circumstances both in the London Plan and the PPG on Housing Supply and Delivery. The following paragraphs set out the rationale.

London Plan

- 4.2 It should be noted that the housing target in the London Plan is a ten-year housing target and is not an annual target. This is clear from paragraph 4.1.7 and Table 4.1 which sets out the targets for each London Borough. Paragraph 4.10 of the London Plan further encourages boroughs to “set out a realistic and, where appropriate, **stepped housing delivery target over a ten-year period**. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.¹¹ With the support of the boroughs and taking account of the information published in accordance with Part D, the Mayor will monitor housing supply against targets on a London-wide basis.”
- 4.3 London Plan Policy H1: Increasing Housing Supply Part D states “Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.”

¹¹ Footnote 45 of the London Plan - This would also fulfil the requirement of a ‘Housing Delivery Test action plan’

PPG on Housing Supply and Delivery

- 4.4 The PPG on Housing Supply and Delivery (paragraph 21)¹² explains when a stepped housing requirement is appropriate for plan-making. It states “A *stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / **or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.** Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.*

*Where there is evidence to support a prioritisation of sites, local authorities **may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g. transport hubs.** These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.”*

- 4.5 It is the case in the Borough that the sites which will deliver most of the housing – the Opportunity Area sites are likely to deliver later in the plan period.
- 4.6 Paragraph 39 of the PPG further explains that “*Where the adopted housing requirement is stepped, these stepped requirements will be used in the Housing Delivery Test in place of annual average requirement figures. A stepped requirement allows authorities to reflect step changes in the level of housing expected to be delivered across the plan period. The buffer applied to the 5 year housing land supply does not constitute a stepped requirement.*”

Unique nature of the Borough

- 4.7 At the last examination of the Local Plan Partial Review, the Planning Inspector accepted the unique circumstances of the Borough as part of the reason to allow the use of a 5 per cent rather than a 20 per cent buffer in calculating our five year housing land supply. This was acknowledged in paragraphs 70-76 of the Inspector’s report¹³. These

¹² <https://www.gov.uk/guidance/housing-supply-and-delivery#calculating>

¹³ https://planningconsult.rbkc.gov.uk/gf2.ti/f/799106/54172837.1/PDF/-/RBKC_LPPR_Inspectors_Report_July_2019.pdf

reasons are still as valid as they were then and while our housing target has reduced in the London Plan 2021, the Borough's reliance on a limited number of sites means we cannot have a steady and even supply of housing. However, we do have sufficient sites with the capacity and the certainty to demonstrate meeting the London Plan target over ten years as required by the London Plan housing targets.

- 4.8 The Borough is highly constrained being the smallest London borough. It is densely built up with the household density in the Borough at 5,515 households per sq km compared to an average of 160 households per sq km in England and Wales. It has the fifth highest population density (11,828 residents per sq km) (Census 2021 First Release Estimates) in England and Wales. It also has a unique historic environment with nearly three quarters of the Borough within designated conservation areas and 4,000 listed buildings.

Opportunity Area Sites

- 4.9 Given the above context of the Borough, we have a very limited number of large sites. Of these, the two of greatest importance for future development and housing delivery are the opportunity area sites at Kensal Canalside and Earl's Court. Together the sites are earmarked to deliver 4,430 homes in the housing trajectory. However, these sites will largely deliver homes later in the plan period as explained below.

Kensal Canalside

- 4.10 Since the adoption of the current Local Plan in September 2019, the Council has undertaken significant work to assist delivery on this site. In particular the Kensal Canalside Supplementary Planning Document (SPD) was adopted in July 2021.
- 4.11 The site is 15.4 hectares and based on the Development Infrastructure Funding Study as well as an understanding of development massing, capacity and building heights the NLPR is continuing with the site allocation as a minimum of 3,500 homes. The site requires significant infrastructure works before it can start to deliver new homes. It does not benefit from planning permission at present to provide any certainty of delivery within the first five years.

Earl's Court

- 4.12 Earl's Court site benefits from an outline planning permission (PP/11/01937) granted in 2013 for 930 homes with reserved matters granted for 586 homes in 2014 (PP/13/07062). However, the site is in new ownership and a new scheme is being developed. The site straddles the boundary with the London Borough of Hammersmith and Fulham. Planning application is expected in 2023.

4.13 To enable and support the development on the site the Council has been working on evidence to support the site allocation. This includes an Earl's Court Site Allocation Viability Study prepared by BNP Paribas; an Earl's Court Commercial Review prepared by Icen Projects; and an Opportunity Area Heights Study, produced by Urban Initiatives Studio, to establish the maximum building heights. This site can start delivering homes in year five i.e. from 2026/27 onwards.

Strategic Housing Land Availability Assessment (SHLAA) 2017

- 4.14 The London Plan SHLAA 2017 uses three sources of housing supply:
- Large sites (of 0.25 hectares in size or more)
 - Small sites (below 0.25 hectares in size)
 - Non self-contained accommodation - this includes: student accommodation; specialist housing for older people in Use Class C2 - eg care homes; hostel accommodation; and shared living schemes/large scale HMOs in Sui Generis use.
- 4.15 The SHLAA sets out the large sites with development capacity to deliver homes in the Borough in Annex E: SHLAA Allocations¹⁴. It uses the following phasing periods for sites (see Table 4.1 below). The SHLAA 2017 included Earl's Court within Phase 1 (see Annex E: SHLAA Approvals, page 221) and Kensal Canalside within Phase 5 (see Annex F: SHLAA Allocations, page 244). It is now clear that the SHLAA assumed a shorter lead in time than has turned out to be the case for Earl's Court. However, as stated above the site will be at the planning application stage in 2023 and can start delivering homes in 2026/27.. While on Kensal Canalside with the on-going work, we would expect delivery to start happening before Phase 5 of the SHLAA. Nevertheless, the site will now realistically deliver housing completions within the first five years.

14

https://www.london.gov.uk/sites/default/files/2017_london_strategic_housing_land_availability_assessment.pdf

Table 4.1 – SHLAA phasing period

| | Phase 1 | Phase 2 | Phase 3 | Phase 4 | Phase 5 |
|--------|------------|------------|------------|------------|------------|
| Start | April 2017 | April 2019 | April 2024 | April 2029 | April 2034 |
| Finish | March 2019 | March 2024 | March 2029 | March 2034 | March 2041 |
| Years | 2 | 5 | 5 | 5 | 7 |

Remaining sites in the SHLAA

- 4.16 The remaining sites in the SHLAA are all site allocations in the current Local Plan. Most of these now have planning permission and some are built out or nearing completion.

Call for sites

- 4.17 The Council undertook a call for sites during the plan-making process. A separate RBKC Site Allocations Paper, January 2022 has been produced and shows how each site has been assessed. A three stage assessment was used and many of the sites put forward did not meet the basic criteria set out in Stage 1 such as being below the 5 home threshold for allocation or not being available for development. Based on this assessment all realistic sites are included as a site allocation in the NLPR Publication Policies and these are included in the housing trajectory as shown in Table 6.1 of this document.

Housing Delivery Test Action Plan

- 4.18 The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (PPG) introduced the ‘Housing Delivery Test’ (HDT) in a phased approach over three years. With the publication of the 2020 HDT in January 2021 the transition period is now over. In accordance with the HDT, if housing delivery falls below 95 per cent of a local planning authority’s (LPA) adopted housing requirement, that LPA is required to produce a HDT Action Plan.
- 4.19 The 2019 HDT, published in February 2020, showed that 57 per cent of the required homes were built in the Borough between 2016/17 and 2018/19. Therefore, the Council produced a HDT Action Plan, which was published in 2020, to set out what actions would be taken to increase the rate and number of homes built in the Borough.

4.20 The subsequent 2020 HDT, published in January 2021, showed that only 49 per cent of the required homes were built between 2017/18 and 2019/20. The HDT published in January 2022 has not changed the situation with 43 per cent homes delivered against the requirement. The Council has an up to date Housing Delivery Test Action Plan published in August 2022¹⁵.

4.21 A summary of the actions taken/will be taken by the Council to increase delivery of homes in the Borough from the updated 2022 HDT Action Plan is set out below:

1. Continue to progress and explore options to build more homes both market and affordable on land in Council ownership, whilst minimising impact on existing communities.
2. Continue to progress the delivery of key sites such as the Kensal Canalside and Earl's Court Opportunity Areas, as well as other key sites.
3. Progress the preparation and delivery of the NLPR to promote and facilitate the delivery of new homes.
4. Promote intensification and mixed-use development in the Borough's Employment Zones through the NLPR.
5. Continue to work with Neighbourhood Forums and local landowners to deliver housing sites allocated in adopted Neighbourhood Plans.
6. Continue to improve communication with residents and communities, agents and developers to ensure effective identification of issues preventing permissions being translated into people's homes through adopted SCI process.
7. Further review of Planning Conditions to accelerate planning permissions being granted and speed up the delivery of new housing.

Protection of other uses in the borough

4.22 It is essential to recognise that the housing shortfall cannot simply be addressed by the release of non-residential uses to housing. Such an approach would result in the homogenisation of uses across the borough, contrary to our ambition to maintain a diversity of uses, a thread which runs across the Local Plan. Such an approach would also be in direct conflict with the expectations of national policy, an expectation that "*strategic policies should ... make sufficient provision for a) employment, retail, leisure and other commercial development;*

¹⁵ <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/housing-delivery-test-action-plan>

and c) community facilities (such as health, education and cultural infrastructure),” as well as for housing. (Paragraph 20 of the NPPF.) This is also clear in paragraph 8 where the NPPF sets out the different objectives of sustainable development. Whilst the provision of housing is important, sustainable development has three objectives: economic, social and environmental. There is a need to “help build a strong, responsive and competitive economy, by ensuring that sufficient land ... is available” By the same token we must support the provision of “accessible services... that reflect current and future needs and support communities’ health, social and cultural wellbeing...”

- 4.23 The need to provide for a balance of uses, to meet the Borough’s various needs, was supported by the Planning Inspector considering the Council’s Local Plan (2019). This included specific reference to the need to protect offices, with the inspector confirming in paragraph 120 of the examination report¹⁶, that, *“the restriction on the loss of offices is justified”* if the OAN is to be met. Paragraph 123 confirms this is also the case for arts and cultural uses, and that the protection of such uses is *“justified given the importance of the borough’s arts and cultural institutions both locally and at a national and international level. It is also consistent with the approach to planning for cultural facilities set out in paragraph 70 of the NPPF.*

Offices

- 4.24 The Council recognises that the nature of the office market has changed since the adoption of the Local Plan in 2019. The changing patterns of work resulting from the Covid-19 pandemic are substantial. In order to assess future need, and to address these changing patterns, the Council has recently commissioned an Employment Land Study.¹⁷ This concludes that there is a need for 60,400 sq m of additional office floorspace across the Borough to 2043. This accounts for a model of hybrid working, and a reduction in “need” of 40 per cent, from that otherwise expected. The study concludes that the protection of existing offices will be essential if this future need is to be met. This reflects the Council’s expectation that only limited office/ mixed use proposals are likely to come forward over and above those which are already allocated or which are otherwise in the pipeline.
- 4.25 Whilst the Council is satisfied that there is a significant need for additional office space over the lifetime of the Plan, there is still a

¹⁶ [Planning Inspectorate, Report on the Examination of the Royal Borough of Kensington and Chelsea Local Plan Partial Review. \(July 2019\)](#)

¹⁷ RBKC Employment Land Study, Icení (November 2021)

substantial differential in value between offices and residential uses. We have carried out a viability assessment¹⁸ which concludes that some 195,000 sq m of the borough's office stock would be at risk of loss to residential if we do not protect office uses. This loss would be due to the differential in value between the uses and not due to any inherent weakness in the office market. It is essential that we protect our office stock if we are to have the benefits of a vibrant sector, a sector which makes a significant contribution to local employment, to the character of our town centres and which contributes to the local and the wider economy.

4.26 The Council has an Article 4 Direction¹⁹ which came into force at the end of July 2022. This removes permitted development rights for change of use from Class E (commercial, business and service uses) to C3 (dwelling houses). The Council initially wanted to introduce a whole borough Article 4 Direction. The Council's evidence was scrutinised closely by the Department for Levelling Up and Communities (DLUCH) and a direction was received to modify the Article 4 Direction on 22 July 2022. The area now covered by the Article 4 Direction is focused on town centres and clusters of offices in the Borough. While it offers protection to the large majority of offices, buildings in Class E use outside of the area covered by the Article 4 Direction would now be able to, in principle, change to residential use.

4.27 We have undertaken a desktop assessment to understand the scale of housing supply from this new source and this is included in Appendix 2. The assessment assumes that properties no longer protected by the Article 4 Direction are likely to convert to residential where there is a greater differential in values of residential over the business use. This differential in value has been quantified in the Council's Employment Land Study²⁰, and a follow up report carried out on behalf of the Council by BNP Paribas²¹ which specifically considered our town centres. In addition, properties that were originally built as a house could be more easily converted back from the commercial use. In areas where residential values are significantly more than commercial, such conversions are even more likely. Our assessment shows around 280 homes could be provided under prior approval or through planning permission.

¹⁸ RBKC Employment Land Study, Icenl (November 2021)

¹⁹ <https://www.rbkc.gov.uk/planning-and-building-control/heritage-and-conservation/article-4-directions>

²⁰ RBKC Employment Land Study, Icenl (November 2021)

²¹ RBKC Permitted Development Right, BNP Paribas (March 2022)

- 4.28 This will help provide more certainty to the small sites assumption used in the housing trajectory as referred to in paragraph 5.9 below.

Retail

- 4.29 In the same way that the loss of existing office stock would hinder the ability of the Council to meet the objectively assessed need for offices, loss of shops to residential would harm the ability to meet the OAN for such uses. Whilst our Retail and Leisure Needs Assessment has identified that there will only be a modest need for additional retail floorspace to 2043 (and only in the convenience sector) we note that any loss would have to be made up before this need could be met.
- 4.30 The Borough's Article Direction covers all our town centres except the neighbourhood centre at Warwick Road and the Billings.
- 4.31 Of greater importance is the role that Class E retail and other town centre uses have upon the character, the function and the vitality and the viability of our town centres. The Covid-19 pandemic has accelerated changes to the patterns of retailing and the role of town centres, changes which were already underway.
- 4.32 We must support our town centres as the hubs for the community as well as the places which attract visitors from further afield. Shopping will remain the key function, but this will be supported by a range of other town centres uses which increase dwell times or which continue to offer something that the internet cannot. Loss of retail and other town centre uses to residential may reduce the attractiveness of the centre and attract fewer visitors. This may be due to the direct impact of adding dead frontage to our centres, or by reducing the "draw" of the centre through the loss of the uses which attract visitors.

Hotels

- 4.33 The importance of the Borough's hotel stock is clear. The report prepared by GLA economics, to inform the new London Plan,²² notes that Kensington and Chelsea remains the third largest supplier of hotel accommodation within the capital, at 15,151 bedrooms, or 10.4 per cent of London's share. The GLA economics working paper suggests that the supply and demand for hotels in the borough is in balance. The NLPR Policy TC8 takes a more flexible view on hotels in the SW5 post code or the Earl's Court area. This is because there is a concentration of hotels which previously served the Ear's Court Exhibition Centre. With the loss of the Exhibition Centre demand has fallen and some hotels are

²² GLA Economics Working Paper 88. Projections of demand and supply for visitor accommodation in London to 2050. (April 2017)

struggling to maintain the occupancy levels needed to allow continued investment in the business.

- 4.34 While our existing and emerging NLPR policy protects hotels, we take a pragmatic view where it is robustly demonstrated that a hotel can no longer viably function.
- 4.35 The approach now proposed in the NLPR should also assist in boosting housing supply.

Social and community and cultural uses

- 4.36 The Local Plan is explicit in seeking to protect all social and community uses. This reflects the role that they play in enabling the community to function. Their role in stimulating a sense of community and providing valuable social infrastructure is essential.
- 4.37 A similar approach is taken for the protection of arts and cultural uses. The Borough is host to more than six hundred arts and cultural organisations. Some are of an international scale, others of more local importance. Together they make the borough the place that it is and add variety and richness to the life of the borough. The protection of such uses is essential.

5. Housing Trajectory

- 5.1 As set out in the introduction to this paper, the NPPF requires the supply of specific deliverable sites, should in addition include a buffer (moved forward from later in the plan period). The buffer can be one of three depending on circumstances - 5 per cent to ensure choice and competition, 10 per cent where the LPA wishes to demonstrate a five-year supply through an annual position statement or recently adopted plan or 20 per cent where there has been significant under delivery over the previous three years²³. The results of the Housing Delivery Test (HDT) are used as the measure of undersupply. The Council delivered 43 per cent housing against the requirements in the 2021 HDT. Therefore, there is a requirement to include a 20 per cent buffer to the first five years of housing supply.
- 5.2 The latest London Plan target applies from April 2021 and so far there has been one year of delivery against this target of 448 homes per annum. The homes completed in the Borough in 2021-22 are 191 net

²³ 39 From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

homes which is below the target by 257 homes. This shortfall has been added to the first ten years. Paragraph 31 of the PPG on Housing Supply and Delivery states that *“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”*

5.3 The Council is using a 10 year period to clear any shortfall in housing delivery against targets rather than the next 5 years. This is for the same reasons that we are introducing a stepped housing trajectory as explained in the previous section. In short, our housing supply is largely reliant on the two Opportunity Area sites which will deliver homes later in the plan-period.

5.4 In the previous Local Plan examination, a similar approach was agreed although the shortfall was spread over the longer plan-period rather than 10 years. The reasons have not changed. Paragraph 70 of the Inspector’s Report²⁴ specifically considers the issue *“Firstly, to spread the undersupply of housing from 2015-2017 over the remainder of the plan period (the Liverpool approach) rather than over the first 5 years (the Sedgefield approach)”*. The Inspector commented at paragraph 71 that *“There is no evidence to suggest that any of the supply projected for years 6-12 of the plan period could be brought forward and delivered in the first 5 years of the plan period.”* He concluded at paragraph 78 that *“I conclude that a 5% buffer is justified in the particular circumstances of Kensington and Chelsea in calculating the 5 year housing requirement for the purposes of the Local Plan Partial Review. For the same reasons dealing with the backlog in the first 5 years of the plan period after adoption would not be deliverable. Furthermore, spreading the backlog over the plan period, using the Liverpool approach, would better reflect the trajectory for the delivery of sites in the Plan’s housing supply.”*

Methodology

Deliverable

5.5 The definition of “deliverable” as set out in the Glossary of the NPPF is, *“To be considered deliverable, sites for housing 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. In particular: a) sites which do not involve major development and*

²⁴ https://planningconsult.rbkc.gov.uk/gf2.ti/f/799106/54172837.1/PDF/-/RBKC_LPPR_Inspectors_Report_July_2019.pdf

have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

5.6 Paragraph 71 of the NPPF recognises that an allowance for a windfall element can be made. It states that, *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”*

5.7 Paragraph 4.1.8 of the London Plan highlights that modelling in the SHLAA shows a capacity for development on small sites across London for 12,000 new homes a year. It makes it clear that the reliance on this windfall element is part of the policy framework set out in the London Plan. It goes on to state that *“Boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. However, because of the nature of some sites (as set out above), including the particular incremental characteristics of small sites, **boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in Table 4.2.** This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect a minimum baseline for housing delivery given the policy focus on developing small sites for housing in this Plan (Policy H2 Small sites) and the package of measures outlined in the London Housing Strategy.”* (emphasis added)

5.8 Sites considered “deliverable” (years 1 to 5 of the trajectory) using the above definition are:

1. **Units under construction (at 1 April 2022) not expected to complete within the current monitoring year.** Assumptions were made that schemes of between 1 and 24 units would be complete within three financial years of the start date. On sites of 25 units or more, the best available site specific information has been used to estimate completions. The larger sites are all shown in Table 8.1.
2. **Council’s New Homes Delivery Programme (NHDP)** – The Council’s sites being delivered as part of the NHPD have grant funding from the Mayor. A condition of the funding is delivery within

a defined period. Therefore, site specific information is available on these sites with certainty of delivery within the first five years.

3. **Major developments with planning permission but not yet under construction** – these are included as deliverable unless there is clear evidence that homes will not be delivered within five years. As the Borough has a limited amount of major development, site specific information has been used to inform the years in which these will be delivered.
4. **Minor developments with planning permission but not yet under construction**, in accordance with the NPPF definition of deliverable these are included unless there is clear evidence that homes will not be delivered within five years. An assumption is made that these will be delivered within years, 3, 4 and 5 of the Plan.
5. **A small-sites estimate (windfall element)** is used from year 4 onwards. The figure of 129 pa has been taken from London Plan 2021 (Table 4.2). The change in protection of offices from borough-wide to concentrated areas as explained in paragraph 4.27 above provides more certainty. In addition, a more relaxed Policy TC8 on hotels will also assist.
6. **Vacant units** - The SHLAA 2017 does not include any allowance for vacant units. Further, the PPG on Housing Supply and Delivery (paragraph 30) cautions against double counting. Therefore, the trajectory makes no allowance for vacant units brought back into use.
7. **Non self-contained allowance** - The non-self-contained allowance for the borough is 0 units per annum (London SHLAA 2013 and 2017) so does not contribute to any projections within the housing trajectory.

Developable

- 5.9 The definition of “developable” as set out in the Glossary on the NPPF is *“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*
- 5.10 Sites considered “developable” (years 6 to 10 and 11 to 15 of the trajectory) using the above definition are:
 1. **Opportunity Area sites** – site specific information on Kensal Canalside and Earl’s Court indicates realistic delivery timescales as “developable”. However, part of Earl’s Court (100 homes) are considered deliverable.

2. **Proposed site allocations** – site allocations without planning permission and where there is no evidence of delivery within the first five years are considered developable.
3. **Units under construction (at 1 April 2022) not expected to complete within the current monitoring year or included as deliverable.** On sites of 25 units or more, the best available information has been used to estimate completions.
4. **Major developments with planning permission but not yet under construction** – sites not included as “deliverable” are included as “developable”. Site specific information has been used to inform the years in which these will be delivered.
5. **A small-sites estimate (windfall element)** is used from year 4 onwards. The figure of 129 pa has been taken from London Plan 2021 (Table 4.2).
6. **Vacant units** - The SHLAA 2017 does not include any allowance for vacant units. Further, the PPG on Housing Supply and Delivery (paragraph 30) cautions against double counting. Therefore, the trajectory makes no allowance for vacant units brought back into use.
7. **Non self-contained allowance** - The non-self-contained allowance for the borough is 0 units per annum (London SHLAA 2013 and 2017) so does not contribute to any projections within the housing trajectory.

6. Stepped housing trajectory

- 6.1 Based on a realistic supply of housing in the first five years, the stepped requirement for the Borough should be as set out in Table 6.1. The total target for the first ten years corresponds with the London Plan target but as Opportunity Area sites start to deliver from year 6 onwards, the delivery is stepped down in the first five years and increased in years 6 – 10.
- 6.2 For years 11 – 15, the London Plan paragraph 4.1.11 states *“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.”* The opportunity area sites and other site allocations that are likely to deliver in this time period have a capacity of 1,909 homes. In addition, rolling forward the small sites assumptions as set out in the above paragraph of the London Plan adds

further capacity for 645 homes. This gives a total of 2,554 homes which can be annualised as 511 homes per annum.

- 6.3 Without the small site assumption, the capacity from site allocations in years 11-15 is 1,909 homes which is about 330 homes below the current London Plan target of 2,240 homes using 448 homes as an annualised figure over five years. Given that this is for the later Plan period, the stepped housing trajectory continues to use 448 dwellings per annum for years 11-15. It should be noted that the NPPF only requires demonstrating a supply for years 11-15 where possible.

Table 6.1: Stepped targets

| | Housing target per annum | Target over five years | Shortfall to be added to the first 10 years | Adjustment for 20% buffer (brought forward from years 6 to 10) – Annual figure | Target figure over five years with shortfall added and adjustments for a 20% buffer – in five year tranches (figures are rounded) |
|------------------------------|--------------------------|------------------------|--|--|---|
| Years 1 to 5 (Deliverable) | 300 | 1,500 | 128.5 | 391 | 1,954 |
| Years 6 to 10 (Developable) | 596 | 2,980 | 128.5 | 596 | 2,783 |
| Total (years 1 to 10) | - | 4,480 | 257 | - | 4,737 |
| Years 11 to 15 (Developable) | 448 | 2,240 | 0 | 448 | 2,240 |

7. Five Year Housing Land Supply (2022/23 to 2026/27)

7.1 The housing supply requirement based on Table 6.1 above including the one year shortfall and a 20 per cent buffer for the first five years is 1,954 homes. This will mean an annualised delivery requirement of 391 homes per annum. The Council can demonstrate a supply of 2,207 homes over this period with a surplus of 253 homes. This is a 5.6 years' supply. The table below provides further details. A breakdown including site details is provided in Table 8.1.

7.2 The trajectory (Figure 7.1) shows that with the exception of 100 homes at Earl's Court the opportunity area sites start to deliver homes from year 6 onwards resulting in an increased supply. The cumulative completions over a 15 year period will exceed the housing targets.

Table 7.1: Sources of Five-Year Housing Supply

| Estimated Year of Completion | Projected Completions | Small Sites Estimate (from SHLAA 2017)* | Total from all Sources |
|------------------------------|-----------------------|---|------------------------|
| FY 2021-22 | 163 | 0 | 163 |
| FY 2022-23 | 614 | 0 | 614 |
| FY 2023-24 | 447 | 0 | 447 |
| FY 2024-25 | 220 | 129 | 349 |
| FY 2025-26 | 506 | 129 | 635 |
| Total | 1,949 | 258 | 2,207 |

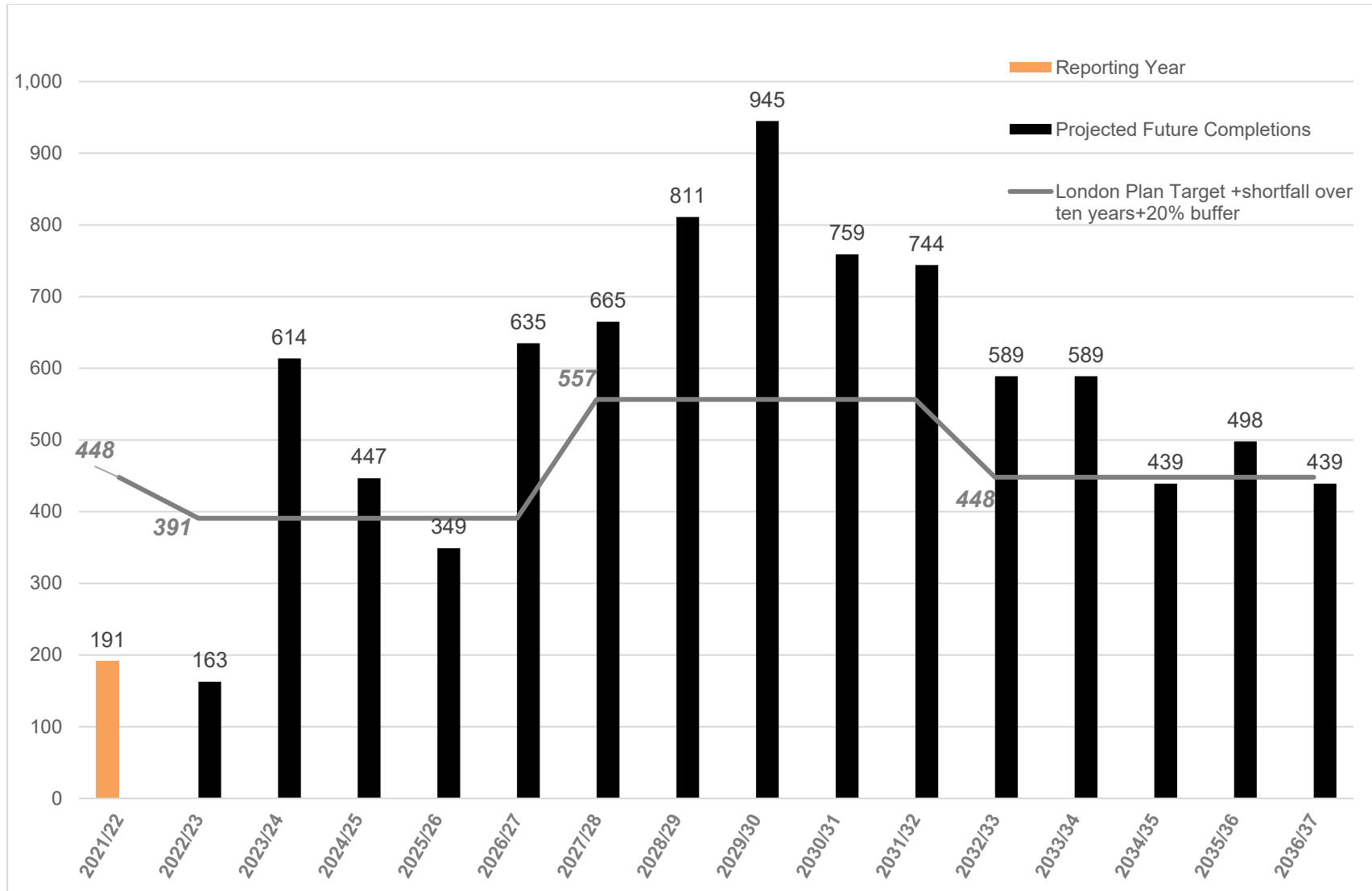


Figure 7.1: Housing Trajectory 2020-21

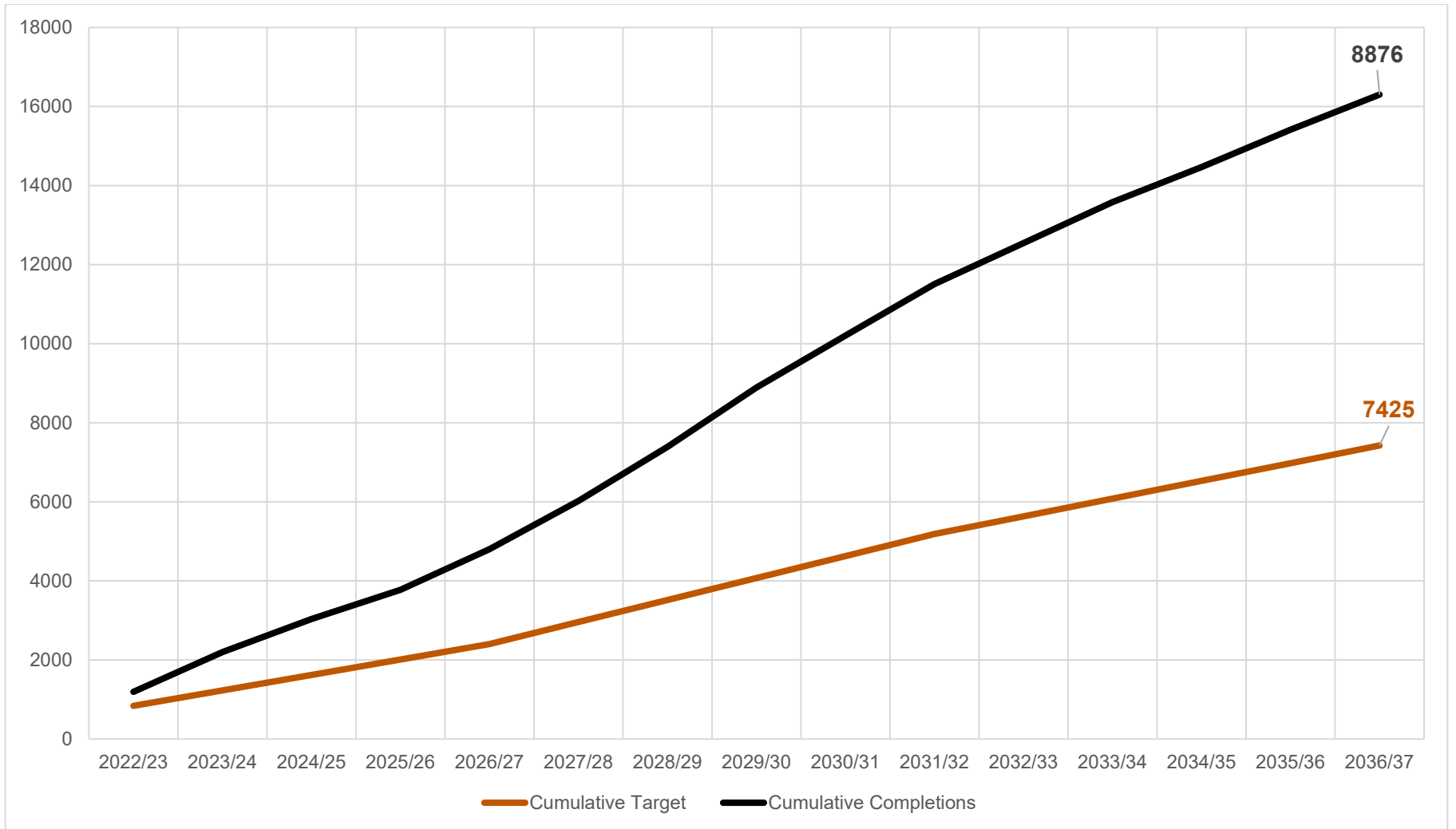


Figure 7.2: Cumulative Completions

8. Years 6 to 10 (2027/28- 2031/32) and Years 11 to 15 (2032/33 – 2036/37)

- 8.1 The sites which make up this element of supply are strategic sites allocated in the NLPR (with and without planning permission) together with other sites in the planning pipeline which are not progressed enough to include in the first five years. The annual small sites estimate of 129 homes per annum as set out in the London Plan has also been included in the land supply for this period for the reasons set out above.
- 8.2 For years 6 to 10, the requirement based on a stepped trajectory is 2,792 new homes (with an adjustment for the 20 per cent buffer that is moved forward to the first five years). Altogether the supply for the next ten years (from 2022/23) is being shown against 4,737 adding the 257 home shortfall for 2021/22 to the 4,480 homes London Plan housing target. The supply shown for years 6 – 10 is 3,924 homes. This is surplus of 1,141 homes. This is a 7.1 years' supply for this period. Given the nature of the Opportunity Area sites, it is a realistic prospect that these sites will increase the delivery in this time period.
- 8.3 For years 11 to 15, the requirement is 2,240 new homes (448 homes x 5) and the supply shown is 2,554 homes. This is surplus of 314 homes. This is a 5.7 years' supply for this period.
- 8.4 Over the whole 15 years the housing requirement is 6,977 homes (including the shortfall of 257 homes) and we have demonstrated delivery of 8,685 homes. This is a surplus of 1,708 homes.

Table 8.1: Sites included in the housing trajectory

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|---|---|---|--|---|--|---|
| Site Allocations (Item 1, 2, 3 of deliverable methodology and items 1, 2, 3, 4 of developable methodology) | | | | | | |
| SA1 (CA1) | Kensal Canalside | Site Allocation. SPD adopted July 2021 | 3,500 | 0 | 1,950 | 1,550 |
| SA2 (CA6) | Earl's Court Exhibition Centre | Site allocation with outline planning permission (and reserved matters for 586 homes) | 1,050 | 100 | 650 | 300 |
| SA3 (CA7) | 100/ 100A West Cromwell Road | Planning permission | 462 | 362 | 100 | 0 |
| SA4 (CA7) | Former Territorial Army site | Planning permission granted | 255 | 0 | 255 | 0 |
| SA5 (CA3) | Wornington Green Phase 3 | Phase 2a under construction. Planning application expected for Phase 3 | 107 | 43 | 64 | 0 |
| SA6 (CA10) | Lots Road South | Site Allocation (Part of the Council's New Homes Delivery Programme) | 165 | 165 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|---|---|--|--|---|--|---|
| SA7 (CA4) | Site at Edenham Way | Site Allocation (Part of the Council's New Homes Delivery Programme) | 60 | 60 | 0 | 0 |
| SA8 (CA12) | Chelsea Farmer's Market | May be required for Crossrail 2 construction. Has planning permission for 59 units | 59 | 0 | 0 | 59 |
| SA9 | Units 1-14 Latimer Road | Neighbourhood Plan, RBKC SPD | 75 | 10 | 65 | 0 |
| SA10 | Newcombe House | Planning Permission | 0 | 0 | 0 | 0 |
| SA11 | The Plaza, 535 King's Road | | 28 | 0 | 28 | 0 |
| Small Sites in NLPR | | | | | | |
| SA12 (CA11) | Harrington Road | Site allocation | 50 | 0 | 50 | 0 |
| SA13 | Emmanuel Kaye, King's Road | Potential site allocation. Call for sites submission | 10 | 0 | 10 | 0 |
| SA14 | St Quintin Garage, 142A | Neighbourhood Plan | 6 | 6 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|---|---|---|--|--------------------------------------|--------------------------------|---------------------------------|
| | Highlever Road | | | | | |
| SA15 | Colebrook Court, Sloane Avenue | Potential site allocation. Call for sites submission | 20 | 0 | 20 | 0 |
| SA16 | Site at Holland Park Roundabout | Potential site allocation. Call for sites submission | 30 | 0 | 30 | 0 |
| Council's New Homes Delivery Programme (unallocated sites) | | | | | | |
| PP/20/00879 | 175-177, Kensal Road | Planning Permission. Council's New Homes Delivery Programme | 37 | 37 | 0 | 0 |
| PP/20/00860 | Plot 5-6 Acklam Road, London | Planning Permission. Council's New Homes Delivery Programme | 32 | 32 | 0 | 0 |
| PP/20/00844 | 15-17, Hewer Street | Planning Permission. Council's New Homes Delivery Programme | 20 | 20 | 0 | 0 |
| PP/20/00943 | 54 St Helen's Gardens | Planning Permission. Council's New Homes Delivery Programme | 8 | 8 | 0 | 0 |
| | Former Barlby Primary School | Council's New Homes Delivery Programme | 83 | 83 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|---|---|--|--|--------------------------------------|--------------------------------|---------------------------------|
| PP/21/04428 | 9, Silchester Road | Council's New Homes Delivery Programme | 11 | 11 | 0 | 0 |
| Other large sites and major developments | | | | | | |
| Site allocation removed (CA9) | Lots Road Power Station | Under construction | 420 | 420 | 0 | 0 |
| PP/19/05105 | 257-265 (Odeon Cinema), Kensington High Street | Under construction | 106 | 106 | 0 | 0 |
| PP/15/04338 | 196 To 222, King's Road and 7 Friese Green House Chelsea Manor Street | Under construction | 39 | 39 | 0 | 0 |
| PP/18/00189 | 232, King's Road (Chelsea Delivery Office) and 18-20 Chelsea Manor Street | Planning Permission | 23 | 23 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|---|--|-----------------------|--|---|--|---|
| PP/15/05730 | 66-70 And 72-74, Notting Hill Gate | Under construction | 9 | 9 | 0 | 0 |
| PP/16/00423 | K1 Site bounded by Brompton Road, Sloane Street, Basil Street and Hoopers Court, London SW3 | Under construction | 24 | 24 | 0 | 0 |
| PP/18/03491 | Chelsea Police Station, Lucan Place | Planning Permission | 32 | 32 | 0 | 0 |
| PP/18/05313 | Heythrop College, Kensington Square | Planning Permission | 106 | 0 | 106 | 0 |
| PP/20/03325 | 201-207, Kensington High Street | Under construction | 19 | 19 | 0 | 0 |
| PP/21/00272 | 344-350, Old Brompton Road (Former | Planning Permission | 45 | 45 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|--|---|--|--|--------------------------------------|--------------------------------|---------------------------------|
| | Tournament Pub) | | | | | |
| PP/18/00599 | Cluny Mews (Land to the rear of 1 Cluny Mews and 51-53 Philbeach Gardens) | Under construction | 35 | 35 | 0 | 0 |
| | South Kensington Underground Station, Pelham Street | Refused planning application (PP/20/03216) | 29 | 0 | 29 | 0 |
| PP/20/05566 | William Sutton Estate | Planning Permission | -78 | 0 | -78 | 0 |
| Total number of dwellings from all above sources | | | 6,877 | 1,689 | 3,279 | 1,909 |
| Remaining planning pipeline (Item 4 of the deliverable methodology) | | | | | | |
| | | | | 260 | 0 | 0 |

| NLPR Ref/ (Local Plan 2019 Ref) / PP Ref | Site | Current Status | Potential number of dwellings (net) | First Five Years (Deliverable) | Years 6 to 10 (Developable) | Years 11 to 15 (Developable) |
|--|--------------------------------------|----------------|--|--------------------------------------|--------------------------------|---------------------------------|
| Small sites estimate from the London Plan (Item 5 of the deliverable and developable methodology) | | | | | | |
| | | | | 258 | 645 | 645 |
| Grand total from all sources | | | | | | |
| | Total number of dwellings | | | 2,207 | 3,924 | 2,554 |

9. Past undersupply in the borough

- 9.1 The PPG on Housing Supply and Delivery (paragraph 031) makes it clear that *“Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure.”*

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgfield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”

- 9.2 In setting the housing need and targets the London Plan evidence has considered previous undersupply. The guidance in the PPG also means that since the London Plan was published in March 2021, this is the base year.

- 9.3 There has been one year of under delivery against the London Plan target of 257 homes for 2020/21. Therefore, as explained above the housing trajectory includes this under delivery and demonstrate supply against 4,737 homes as opposed to 4,480 homes in the first ten years (2022/23 to 2031/32). Any undersupply in future years will also be added to future updates of the housing trajectory and spread over ten years.

Appendix 1 Housing Trajectory Summary Table

| Year | Projected Future Completions | London Plan Target (4,480 over ten years) | London Plan Target +shortfall over ten years+20% buffer |
|---------|------------------------------|---|---|
| 2022/23 | 163 | 300 | 391 |
| 2023/24 | 614 | 300 | 391 |
| 2024/25 | 447 | 300 | 391 |
| 2025/26 | 349 | 300 | 391 |
| 2026/27 | 635 | 300 | 391 |
| 2027/28 | 665 | 596 | 557 |
| 2028/29 | 811 | 596 | 557 |
| 2029/30 | 945 | 596 | 557 |
| 2030/31 | 759 | 596 | 557 |
| 2031/32 | 744 | 596 | 557 |
| 2032/33 | 589 | 448 | 448 |
| 2033/34 | 589 | 448 | 448 |
| 2034/35 | 439 | 448 | 448 |
| 2035/36 | 498 | 448 | 448 |
| 2036/37 | 439 | 448 | 448 |
| 15 year | 8,685 | 6720 | 6,977 |

*Buffer is added to the first five years. As required in the NPPF, this is moved forward from later in the Plan period. Therefore, the targets later in the Plan period are then adjusted accordingly. In total over 10 years the housing target remains 448 X 10 + 257 shortfall from 2021/22 or 4,737.

Appendix 2 Desktop Assessment of potential Class E to Residential change of use outside of the Article 4 Direction Area

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|--|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| (INC 22 COLLINGHAM ROAD) COURTFIELD GARDENS 40A COLLINGHAM ROAD LONDON SW5 0LX | 138 | 100-500 | Office | Offices Sub-sector | Yes | High | 4 |
| 1 DERRY STREET LONDON W8 5HY | 66 | <100 | Office | Offices Sub-sector | No | High | 1 |
| 1 FRANKLIN'S ROW LONDON SW3 4SW | 830 | 500-1500 | Office | Offices Sub-sector | No | High | 10 |
| 105 LADBROKE GROVE LONDON W11 1PG | 481 | 100-500 | Office | Offices Sub-sector | Yes | High | 6 |
| 11 ADDISON CRESCENT LONDON W14 8JR | 472 | 100-500 | Office | Offices Sub-sector | Yes | High | 3 |
| 11 ROYAL CRESCENT MEWS LONDON W11 4SY | 171 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 128 COLEHERNE COURT OLD BROMPTON ROAD LONDON SW5 0EB | 31 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 12B QUEENSBERRY MEWS WEST LONDON SW7 2DU | 44 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|--|------------|-----------|----------|-------------------------------|----------------------------|---------------------|--|
| 131 HOLLAND PARK AVENUE LONDON W11 4UT | 482 | 100-500 | Office | Offices Sub-sector | Yes | High | 5 |
| 147-151 DOVEHOUSE STREET LONDON SW3 6LB | 430 | 100-500 | Office | Offices Sub-sector | Yes | High | 3 |
| 15 ATHERSTONE MEWS LONDON SW7 5BX | 70 | <100 | Industry | General Industrial Sub-sector | Yes | High | 1 |
| 15/17 HARRIET WALK LONDON SW1X 9JQ | 258 | 100-500 | Office | Offices Sub-sector | No | High | 2 |
| 16A PORTOBELLO ROAD LONDON W11 3DH | 55 | <100 | Industry | General Industrial Sub-sector | No | High | 1 |
| 18 PORTOBELLO ROAD LONDON W11 3DH | 42 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 180-186 CROMWELL ROAD LONDON SW5 0SS | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST & 2ND FLRS 27 EMPERORS GATE LONDON SW7 4HS | 87 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FL 3 LOGAN PLACE LONDON W8 6QN | 130 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FL LEFT 13 PRINCE OF WALES TERRACE LONDON W8 5PG | 44 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|---|------------|-----------|----------|-------------------------------|----------------------------|---------------------|--|
| 1ST FLR CHELSEA CLOISTERS SLOANE AVENUE LONDON SW3 3EL | 143 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FLR 1 CHESHAM STREET LONDON SW1X 8NF | 72 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FLR 11 ELVASTON PLACE LONDON SW7 5QG | 89 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FLR 226 CROMWELL ROAD LONDON SW5 0SR | 94 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 1ST FLR UNIT B 21 HOLLAND PARK GARDENS LONDON W14 8DZ | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 2 ADDISON PLACE LONDON W11 4RJ | 59 | <100 | Industry | Industry Other Sub-sector | Yes | High | 1 |
| 2 GOLBORNE MEWS LONDON W10 5SB | 33 | <100 | Industry | Industry Other Sub-sector | Yes | High | 1 |
| 2 ST CHARLES PLACE LONDON W10 6EG | 166 | 100-500 | Office | Offices Sub-sector | No | High | 1 |
| 21 GATE HILL COURT 166 NOTTING HILL GATE LONDON W11 3QT | 40 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 25A EDITH GROVE LONDON SW10 0LB | 33 | <100 | Industry | General Industrial Sub-sector | No | High | 1 |
| 27 KELSO PLACE LONDON W8 5QG | 489 | 100-500 | Office | Offices Sub-sector | No | High | 6 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|---|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| 27 QUEENSDALE PLACE LONDON W11 4SQ | 105 | 100-500 | Office | Offices Sub-sector | No | High | 1 |
| 280B EARLS COURT ROAD LONDON SW5 9AS | 84 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 29 FERNSHAW ROAD LONDON SW10 0TG | 142 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| 2ND & 3RD FLR 226 CROMWELL ROAD LONDON SW5 0SR | 121 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| 2ND FL 11 ELVASTON PLACE LONDON SW7 5QG | 62 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 2ND FL 3 LOGAN PLACE LONDON W8 6QN | 106 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 2ND FL RIGHT 13 PRINCE OF WALES TERRACE LONDON W8 5PG | 53 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 2ND FLR 1 CHESHAM STREET LONDON SW1X 8NF | 59 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 2ND FLR 226 CROMWELL ROAD LONDON SW5 0SR | 107 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 2ND FLR LEFT 13 PRINCE OF WALES TERRACE LONDON W8 5PG | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|--|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| 3 OLD MANOR YARD LONDON SW5 9AB | 71 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 3 PEMBRIDGE MEWS LONDON W11 3EQ | 76 | <100 | Office | Offices Sub-sector | No | High | 1 |
| 3 CEDAR STUDIOS GLEBE PLACE LONDON SW3 5JE | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 30 COLLINGHAM GARDENS LONDON SW5 0HN | 518 | 500-1500 | Office | Offices Sub-sector | Yes | High | 1 |
| 30 REDBURN STREET LONDON SW3 4BX | 40 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 36 DRAYCOTT PLACE LONDON SW3 2SA | 53 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 36 WALPOLE STREET LONDON SW3 4QU | 185 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| 364-366 FULHAM ROAD LONDON SW10 9UU | 62 | <100 | Office | Offices Sub-sector | Yes | High | |
| 3RD FLR 1 CHESHAM STREET LONDON SW1X 8NF | 61 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 3RD FLR 12 PENZANCE PLACE LONDON W11 4PA | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 3RD FLR 27 EMPERORS GATE LONDON SW7 4HS | 46 | <100 | Office | Offices Sub-sector | Yes | High | |
| 4 PEMBRIDGE MEWS LONDON W11 3EQ | 185 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|--|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| 4 QUEENS GATE MEWS LONDON SW7 5QJ | 238 | 100-500 | Office | Offices Sub-sector | Yes | High | 3 |
| 4 KIMBOLTON ROW FULHAM ROAD LONDON SW3 6RQ | 128 | 100-500 | Office | Offices Sub-sector | No | High | 2 |
| 41974 VICTORIA ROAD LONDON W8 5RD | 101 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 448111 LADBROKE GROVE LONDON W11 3BD | 393 | 100-500 | Office | Offices Sub-sector | No | High | 6 |
| 47 LONGRIDGE ROAD LONDON SW5 9SD | 188 | 100-500 | Office | Offices Sub-sector | Yes | High | 5 |
| 49 PEMBRIDGE VILLAS LONDON W11 3ES | 58 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 4TH FL 27 EMPERORS GATE LONDON SW7 4HS | 50 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 51C OAKWOOD COURT LONDON W14 8JY | 70 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 51D OAKWOOD COURT ABBOTSBURY ROAD LONDON W14 8JY | 153 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 57 PORTOBELLO ROAD LONDON W11 3DB | 82 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 5A GREGORY PLACE LONDON W8 4NG | 90 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|--|------------|-----------|----------|-------------------------------|----------------------------|---------------------|---|
| 5A SCAMPSTON MEWS LONDON W10 6HX | 57 | <100 | Industry | General Industrial Sub-sector | Yes | High | 1 |
| 5TH FL 344 KENSINGTON HIGH STREET LONDON W14 8NS | 154 | 100-500 | Office | Offices Sub-sector | No | High | 3 |
| 6 BRAY PLACE LONDON SW3 3LP | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 6 BRECHIN PLACE LONDON SW7 4QA | 92 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 6 HYDE PARK GATE LONDON SW7 5EW | 315 | 100-500 | Office | Offices Sub-sector | Yes | High | 4 |
| 6 PEMBROKE WALK LONDON W8 6PQ | 97 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 6 ROLAND GARDENS LONDON SW7 3PH | 74 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 6 ST CATHERINES MEWS LONDON SW3 2PX | 239 | 100-500 | Office | Offices Sub-sector | No | High | 3 |
| 61 UPCERNE ROAD LONDON SW10 0SF | 139 | 100-500 | Industry | Industry Other Sub-sector | No | High | 1 |
| 65 WALTON STREET LONDON SW3 2HT | 139 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 66 PRINCEDALE ROAD LONDON W11 4NL | 41 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 8 LOGAN PLACE LONDON W8 6QN | 47 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| 82 CHELSEA MANOR STREET LONDON SW3 5QJ | 108 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|---|------------|-----------|----------|-------------------------------|----------------------------|---------------------|--|
| 84 DRAYTON GARDENS LONDON SW10 9SB | 255 | 100-500 | Office | Offices Sub-sector | Yes | High | 3 |
| 91 DRAYCOTT AVENUE LONDON SW3 3AN | 100 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 91A DRAYTON GARDENS LONDON SW10 9QU | 106 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| 9B LADBROKE GROVE LONDON W11 3BD | 128 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| ARTILLERY HOUSE 1A SLOANE COURT EAST LONDON SW3 4TQ | 79 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BASEMENT 27 EMPERORS GATE LONDON SW7 4HS | 43 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BASEMENT 32 NEVERN PLACE LONDON SW5 9PP | 41 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST VICARAGE COURT VICARAGE GATE LONDON W8 4HD | 104 | 100-500 | Industry | General Industrial Sub-sector | No | High | 2 |
| BST & GND FLR 27 EMPERORS GATE LONDON SW7 4HS | 86 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST & GRD FLR RR 209 LADBROKE GROVE LONDON W10 4HQ | 47 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

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| BST 10 ROLAND GARDENS LONDON SW7 3PH | 68 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST 11 EDITH GROVE LONDON SW10 0JZ | 92 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST 30 ST CHARLES SQUARE LONDON W10 6EE | 67 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST BLOCK A ST MARY ABBOTS COURT WARWICK GARDENS LONDON W14 8RP | 77 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST FL FR 7 BONCHURCH ROAD LONDON W10 5SD | 33 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST FLR 203 HOLLAND PARK AVENUE LONDON W11 4UL | 75 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST FNT 11 ELVASTON PLACE LONDON SW7 5QG | 64 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST NORTH NELL GWYNNE HOUSE SLOANE AVENUE LONDON SW3 3AX | 1100 | 500-1500 | Industry | Industry Other Sub-sector | Yes | High | |
| BST RR 11 ELVASTON PLACE LONDON SW7 5QG | 45 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| BST-4TH FLRS 3-4 ELVASTON PLACE LONDON SW7 5QH | 829 | 500-1500 | Office | Offices Sub-sector | Yes | High | 10 |

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| EXCL BST 13 FAWCETT STREET LONDON SW10 9HN | 110 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| FACIAL WORKOUT STUDIO ST MARY ABBOTS VICARAGE GATE LONDON W8 4HN | 42 | <100 | Office | Offices Sub-sector | | High | 1 |
| FLAT 2 AT 24 RUSSELL ROAD LONDON W14 8HU | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| FLAT 3 AT 23 ELSHAM ROAD LONDON W14 8HB | 32 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND & LOWER GND FLS 27 PALACE GATE LONDON W8 5LS | 107 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL 13 PRINCE OF WALES TERRACE LONDON W8 5PG | 86 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL 28 WALPOLE STREET LONDON SW3 4QS | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL 3 LOGAN PLACE LONDON W8 6QN | 154 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL 344 KENSINGTON HIGH STREET LONDON W14 8NS | 99 | <100 | Office | Offices Sub-sector | No | High | 2 |

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|---|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| GND FL 54 PONT STREET LONDON SW1X 0AE | 73 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL 96 EARLS COURT ROAD LONDON W8 6EG | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL PT 87 ABINGDON ROAD LONDON W8 6AW | 34 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL REAR 77-79 LONSDALE ROAD LONDON W11 2DF | 51 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FL RR & 1ST FL CHELSEA CLOISTERS SLOANE AVENUE LONDON SW3 3EL | 269 | 100-500 | Office | Offices Sub-sector | Yes | High | 4 |
| GND FLR 1 CHESHAM STREET LONDON SW1X 8NF | 47 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FLR 11 ELVASTON PLACE LONDON SW7 5QG | 86 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FLR 27 EMPERORS GATE LONDON SW7 4HS | 43 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FLR 30 REDBURN STREET LONDON SW3 4BX | 36 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GND FLR 31 RUSSELL ROAD LONDON W14 8HU | 59 | <100 | Office | Offices Sub-sector | Yes | High | 1 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|---|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| GND FLR RR CHELSEA CLOISTERS SLOANE AVENUE LONDON SW3 3EL | 126 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| GND FLR UNIT A 21 HOLLAND PARK GARDENS LONDON W14 8DZ | 85 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GRD FLR & 1ST FLR REAR 14A AIRLIE GARDENS LONDON W8 7AL | 118 | 100-500 | Office | Offices Sub-sector | No | High | 1 |
| GRD FLR 226 CROMWELL ROAD LONDON SW5 0SR | 128 | 100-500 | Office | Offices Sub-sector | Yes | High | 1 |
| GRD FLR 41 CAMBRIDGE GARDENS LONDON W10 5UA | 32 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GRD FLR 49 PORTLAND ROAD LONDON W11 4LJ | 33 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| GRD FLR 9-15 QUEENS GATE PLACE MEWS LONDON SW7 5BG | 268 | 100-500 | Office | Offices Sub-sector | Yes | High | 4 |
| LGRD FLR 226 CROMWELL ROAD LONDON SW5 0SR | 114 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| LGRD GRD AND 1ST FLR 226 CROMWELL | 336 | 100-500 | Office | Offices Sub-sector | Yes | High | 4 |

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|---|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| ROAD LONDON SW5 0SR | | | | | | | |
| LWR GRD & GRD FLR 49 PORTLAND ROAD LONDON W11 4LJ | 74 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| LWR GRD FLR 49 PORTLAND ROAD LONDON W11 4LJ | 41 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| OFFICE 4 GRD FLR 282 EARLS COURT ROAD LONDON SW5 9AS | 36 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| PT BST & GRD FLRS 3 TELFORD ROAD LONDON W10 5SH | 103 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| PT BST 12 LANSDOWNE WALK LONDON W11 3LN | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| PT BST AT 1 CHESHAM STREET LONDON SW1X 8NF | 45 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| PT BST GND-3RD FLRS 1 CHESHAM STREET LONDON SW1X 8NF | 284 | 100-500 | Office | Offices Sub-sector | Yes | High | 2 |
| PT GRD 1ST & 2ND FLRS MARTIN HOUSE 26-30 OLD CHURCH STREET LONDON SW3 5DA | 373 | 100-500 | Office | Offices Sub-sector | Upper floors of mixed | High | 4 |
| THE GATE HOUSE 3A SWANSCOMBE ROAD LONDON W11 4SU | 68 | <100 | Office | Offices Sub-sector | No | High | 1 |

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|---|------------|-----------|--------|--------------------|----------------------------|---------------------|--|
| THE PENTHOUSE HIGHFIELD HOUSE 4 WOODFALL STREET LONDON SW3 4DJ | 40 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| UNIT 1 GND FL 34 SOUTHERN ROW LONDON W10 5AN | 74 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| UNIT 1. 20 REDFIELD LANE LONDON SW5 0RJ | 38 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| UNIT B 13 HEWER STREET LONDON W10 6DU | 44 | <100 | Office | Offices Sub-sector | Yes | High | 1 |
| (INC 14A EDGE ST) 1 KENSINGTON PLACE LONDON W8 7PN | 57 | <100 | Office | Offices Sub-sector | No | Medium | 1 |
| 1ST FL 346 KENSINGTON HIGH STREET LONDON W14 8NS | 313 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 1ST FL PT IXWORTH HOUSE IXWORTH PLACE LONDON SW3 3PT | 350 | 100-500 | Office | Offices Sub-sector | No | Medium | 15 |
| 2ND & 3RD FLRS 346 KENSINGTON HIGH STREET LONDON W14 8NS | 388 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 2ND FL IXWORTH HOUSE IXWORTH | 268 | 100-500 | Office | Offices Sub-sector | No | Medium | |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
|---|------------|-----------|----------|-------------------------------|----------------------------|---------------------|--|
| PLACE LONDON SW3 3PT | | | | | | | |
| 2ND FLR (NTH) 90-100 SYDNEY STREET LONDON SW3 6NJ | 225 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 2ND FLR (STH) 90-100 SYDNEY STREET LONDON SW3 6NJ | 100 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 2ND FLR 346 KENSINGTON HIGH STREET LONDON W14 8NS | 206 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 362 FULHAM ROAD LONDON SW10 9UU | 58 | <100 | Industry | General Industrial Sub-sector | No | Medium | 1 |
| 3RD FL IXWORTH HOUSE IXWORTH PLACE LONDON SW3 3QH | 202 | 100-500 | Office | Offices Sub-sector | No | Medium | 3 |
| 3RD FL 90-100 SYDNEY STREET LONDON SW3 9PZ | 303 | 100-500 | Office | Offices Sub-sector | Mixed use | Medium | 2 |
| 3RD FLR 346 KENSINGTON HIGH STREET LONDON W14 8NS | 182 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 41A MARY PLACE LONDON W11 4PL | 64 | <100 | Industry | General Industrial Sub-sector | No | Medium | 1 |
| 4TH FL 344 KENSINGTON HIGH STREET LONDON W14 8NS | 157 | 100-500 | Office | Offices Sub-sector | No | Medium | 3 |

| Address | Total Area | Size Band | Sector | Sub Sector | Purpose built residential? | Risk for conversion | Potential no. of units (This should not be used as a capacity testing exercise for any prior approval/application) |
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| 4TH FL 346 KENSINGTON HIGH STREET LONDON W14 8NS | 167 | 100-500 | Office | Offices Sub-sector | No | Medium | 3 |
| 5TH FLR 346 KENSINGTON HIGH STREET LONDON W14 8NS | 162 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 6TH FL 346 KENSINGTON HIGH STREET LONDON W14 8NS | 154 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| 7TH FL 346 KENSINGTON HIGH STREET LONDON W14 8NS | 134 | 100-500 | Office | Offices Sub-sector | No | Medium | 2 |
| BST 116 GLOUCESTER ROAD LONDON SW7 4SD | 45 | <100 | Office | Offices Sub-sector | No | Medium | 1 |
| GRD FLR RR 611 HARROW ROAD LONDON W10 4RA | 91 | <100 | Office | Offices Sub-sector | | Medium | 1 |
| INCL PT GND FL 118 GLOUCESTER ROAD & PT BST & PT GND FL 90-92 CROMWELL ROAD LONDON SW7 4EZ | 376 | 100-500 | Office | Offices Sub-sector | Yes | Medium | 5 |
| LG-4TH FLRS 87 LANCASTER ROAD LONDON W11 1QQ | 816 | 500-1500 | Office | Offices Sub-sector | | Medium | 10 |

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