

Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

November 2014 Issues and Options: Enterprise

General Comments

Name	Company / Organisation Name		Comment
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)	St Quintin and Woodlands Neighbourhood Forum	<p>Context of the Issues and Options paper</p> <p>1.1 The paper forms an initial stage of Partial Review of Chapter 31 of the Core Strategy, Fostering Vitality and the "saved policies" from chapter 6 the Council's Unitary Development Plan. It focuses on those policies which relate to offices, light industrial and other "B Class uses", along with a section on hotels.</p> <p>1.2 The StQW Forum feels strongly that this focus continues to lead the Council towards too narrow an approach to 'enterprise' and economic activity, at a time when the world of work is undergoing major change. The focus remains on the spatial allocation and protection of B1 office floorspace, an issue on which the Council has been lobbying hard to retain its current borough-wide exemption from Government plans to make permanent the temporary flexibilities on change of use.</p> <p>1.3 While it is understandable that this should be a focus for RBKC at the present time, the paper takes insufficient account of ways in which 'offices' and 'employment' have changed and will change further by 2028 (the time period set for updated policies in the Local Plan).</p> <p>1.4 It is not clear why the Council continues to look at B1 office use in isolation from A and D class uses, which also involve the creation or retention of 'enterprise' and employment.</p> <p>1.5 In terms of changes to the world of work, the 2014 The Frost Meadowcroft study notes that 'Approximately 10% of all the businesses in the Borough are classified as 'Home Based Businesses', which is a high proportion in comparison with the London average (5.6%)'.</p> <p>1.6 The trend towards home-working, and for basing business activity in residential accommodation, has increased rapidly as fast broadband has become available. It makes economic sense, in an borough with high commercial rents, to minimise the 'office' floorspace used by enterprise, private or public. Increasing proportions of the workforce are self-employed or have portfolio careers where some of their work time may take place at a hot desk in an office, but much will happen elsewhere, including in serviced office centres. Bigger businesses are also finding it possible to operate with less B1 floorspace relative to their turnover.</p> <p>1.7 Planning cities via a spatial approach to use classes, drawing boundaries on a borough-wide 'plan' around 'employment zones', 'business districts' and 'town centres', no longer has the impact and outcomes it once had. The previous link between land use planning, spatial allocation policies, and employment outcomes has weakened in the past decade, and will continue to do so.</p> <p>Latimer Road part of the Freston/Latimer EZ - Viability studies undertaken by RBKC</p> <p>4.4 The study commissioned by the Council from Peter Brett Associates (revised version 2013) gives a broadly</p>	<p><i>On the context of the Issues and Options Paper</i> The Council has considered the "need" for offices in the future. This is based upon the GLA LOPR of 2012 and the subsequent update. As such it is satisfied that business uses should be protected across the Borough.</p> <p>The Local Plan does support a greater diversity of uses within all the Employment Zones. This includes the introduction of some residential uses, as long as this "enables" an increase in the quality and quantity of business floorspace.</p> <p>The StQWNP includes specific policies for the northern part of the Freston Road/ Latimer Road Employment Zone. This includes support for a greater diversity of uses. The NP will form part of the Borough's development plan as and when 'made'. It is already given considerable weight in determining planning applications as it has passed referendum.</p> <p><i>On the context of the Borough's studies.</i> The Council notes the consultee does not concur with the conclusion of the Frost Meadowcroft study, a report which was commissioned by the Council to consider the viability, or otherwise, of the northern part of the Freston/ Latimer Road Employment Zone. This very issues was, however, considered in some depth by the Inspector at the examination into the StQWNP, with the inspector concluding that the area was a viable office location.</p> <p><i>On a different vision for Latimer Road.</i> The SQWNP includes a specific vision for Latimer Road, including a greater variety of non B class uses within it. The NP will form part of the Borough's development plan as and when 'made'. It is already given considerable weight in determining planning applications as it has passed referendum.</p>

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		<p>accurate picture of the contrasting fates of the two parts of the Freston Road/Latimer Road Employment Zone. After a slow start, the Freston Road area has succeeded in attracting major commercial owners and tenants. This has led to the building of major office premises, with the large floorplates and infrastructure required for modern office space (Monsoon/Accessorise, Talk Talk, Winsor and Newton).</p> <p>4.5 As the PBA report says of the combined zone 'At its southern end the area is attractive, close to the Tube station and Westfield shopping centre and well provided with amenities. But moving northwards, part of the zone sits under the intersection of the A40 Westway and A3220 West Cross Road, creating a physical barrier and a potentially intimidating environment. North of the Westway the environment deteriorates, business uses are more thinly spread and there is a general lack of amenities'.</p> <p>4.6 The PBA study notes that 'For the oldest office stock in the north of the area, viability is marginal, with quoting rents just under £180 per sq m. Going forward, these rents may not be enough to sustain the existing stock. They are certainly not enough to support new development.' It concludes</p> <p>the offices to the north of the zone are not well occupied and command low rents. The root of the problem is the area's poor environment and difficult access, and the lack of a critical mass of office property'.</p> <p>4.7 Policy options were offered to the Council in the PBA report. These options have not been picked up in the Issues and Options paper. PBA took the view that mixed use, with residential above office floorspace, has generally proved unsuccessful in areas like RBKC and is unattractive to office tenants. The StQW Forum does not agree with this view, and is confident that in the particular scenario of Latimer Road (historically a mixed use street) housing and office/studio/workshop space can successfully be combined, through application of carefully tailored planning policies and a set of design guidelines for the incremental redevelopment of the warehouse light/industrial premises at Units 1-14.</p> <p>4.8 The PBA study suggested to the Council an alternative policy option of 'major improvements to the environment, public realm and access, focusing on the route from the Tube station'. There is no sign of RBKC pursuing this option and although the Westway Trust is making some improvements to cycle/pedestrian routes across the land that it manages, the Latimer Road part of the EZ will continue to suffer from poor public transport accessibility and lack of amenities. PBA acknowledge (para 4.62) that a strategy of RBKC led major improvements would carry risks because there is no guarantee such steps would make the area sufficiently attractive to office tenants.</p> <p>4.9 The PBA study concludes (para 4.158) 'while most office areas in the Borough remain financially viable in that area (northern part of the Freston/Latimer EZ) the Council needs to make a choice. It could intervene actively to upgrade the business environment, which should improve office demand and values. Otherwise it may have to consider relaxing the policy that safeguards existing offices, because that stock may become unviable'.</p> <p>4.10 PBA identify Earls Court as the only other part of the Borough where office space may become 'economically marginal'. Earls Court is singled out for potential differential treatment in the Issues and Options paper, whereas Latimer Road is not. As the evidence in the Draft Neighbourhood Plan shows, office rents in Latimer Road are if anything even lower than in Earls Court (see Para 4.15 below). Nor is there any mention in the Issues and Options paper of the fact that a neighbourhood plan covering Latimer Road has been in preparation for two years, with substantial evidence of the viability problems of Latimer Road previously presented to the Council. It is not clear why the Council is ignoring the conclusions of the PBA study, and the proposals in the StQW Draft Plan, in re- commencing a review of Enterprise policies in the Core Strategy.</p> <p>4.11 One reason for these omissions may be the 2014 study commissioned by RBKC from Frost Meadowcroft, on which the Planning Department appears to be placing great reliance.</p> <p>4.12 This study, in the view of the StQW Forum, is seriously flawed. The survey questionnaire used is brief and</p>	

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		<p>general, and seeks no information on rent levels. The average rent levels of £36 per sq ft for Grade A and £23 per sq ft for Grade B floorspace, quoted in Figure 6 for the Latimer Road/Freston Road EZ, apply only to the Freston Road area with its better facilities, transport links, and modern accommodation. These figures are well above actual office rents achieved in Latimer Road.</p> <p>4.13 These erroneous rent levels have been fed into a Frost Meadowcroft viability model which concludes (in a summary table at Figure 17) that the whole of the Freston Road/Latimer Road EZ is 'viable'. This summary information has then been used at Table 2.2 in the RBKC Issues and Options paper, and similarly misrepresents the real position in Latimer Road.</p> <p>4.13 Both Frost Meadowcroft and the RBKC Planning Department should be well aware of these inaccuracies. Apart from the very different (and generally accurate) findings of the PBA study, the Council has received a series of representations in recent years, from building owners and commercial estate agents, on the problems of finding tenants for office floorspace at the southern end of Latimer Road. Several of these representations have quoted rent levels sought and achieved. Annexe A to this consultation response contains copies of this material.</p> <p>4.14 Frost Meadowcroft have themselves been seeking a tenant for over a year for floorspace at Ivey Court, Latimer Road, at a rent level of £17.50. At least three sets of agents have been involved in trying to find tenants for this space since it was vacated over 6 years ago. The real problems faced by landlords at the southern end of Latimer Road is that they cannot justify modernising or putting funds into keeping the buildings in a good state of repair. The rents achieved are simply not enough to stop a vicious circle developing. These problems are only made worse by the state of the art modern buildings being built nearby.</p> <p>4.15 As made clear in letters from estate agents and building owners, provided to RBKC in recent years, the problem of vacant office space at the southern end of Latimer Road has been long term. Vacancies have been prolonged and up to 25% in some buildings. These levels have fallen recently, as the economy has picked up, but this has not led to an increase in rents, which remain firmly in the £15-20 per sq ft range. The only recent example of a rent over £20 being achieved was at Olympic House where £22.50 on part of the ground floor was agreed following RBKC permission for mixed uses including D2 gym. A health/gym operator subsequently took this space on this basis.</p> <p>4.16 Current rental figures being achieved for offices are still at the £180 per sq m level quoted in the PBA study as being insufficient to finance continued upkeep and operation of the premises. Rent levels are far below the £300 per sq m (and with a good tenant) identified by PBA as necessary for office redevelopment. The fact that the Westway Trust did not proceed with a 2006 planning approval to build a 1,230 B1 office building on the undeveloped site at 301 Latimer Road supports this view.</p> <p>4.17 The current position in Latimer Road is that office buildings at the southern end remain rundown with little prospect of improvement. The existing employment space is thinly occupied. A survey for the StQW Draft Plan revealed a total of approx 100 people working in 27,500 sq ft across 8 buildings at a density of 1 person in over 250 sq ft. Such a low density is roughly a third of what might be expected in a modern office.</p> <p>4.18 It has been argued that if and when the pedestrian/cycle underpass between Imperial West and Latimer Road is constructed, this should bring more life to the area and make it more attractive. This may be so, but at the same time the Imperial West development will be offering 75,000 sq ft of brand new business incubator floorspace, at rents which the College say will be competitive for the White City area. This new competition is referred to in the PBA and Frost Meadowcroft studies but is not mentioned in the Issues and Options paper.</p> <p>4.19 The southern end of Latimer Road has suffered from fly-tipping, petty crime/anti-social behaviour, and thefts of equipment from office buildings for many years. The introduction of additional housing at this end of the road will provide more 'eyes on the street' and less risk of trespass on the railway embankment.</p>	

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		<p>A different vision for Latimer Road</p> <p>5.1 The work of the StQW Forum in consulting local residents and businesses, in the preparation of the StQW Draft Plan, has demonstrated a widespread desire to see Latimer Road tidied up, made safer, and improved as an environment. Local people also see this as the best location for a range of amenities and facilities that the neighbourhood currently lacks (restaurants, coffee shops, creches, gyms, galleries, interesting retail, multi-use community/performance space),</p> <p>5.2 In addition Latimer Road was specifically identified by 23% of respondents to the 2014 StQW Survey as one of the very few locations in the neighbourhood where new housing can be accommodated. Local people do not appear to share the concerns expressed in the PBA study on mixed use, with housing on floors above commercial premises. The type of office users attracted to the location, and already beginning to make their presence felt in the street, are compatible with residential use (e.g. conversion of Unit 11, and the photographer's archive/studio at 296 Latimer Road currently under construction).</p> <p>5.3 The street has always had a mix of housing and employment use, and the boundary lines drawn round the 'employment zone' sections of the street are seen as an artificial construct, increasingly inappropriate to the 2014-2024 period when employment patterns are fast changing.</p> <p>5.4 RBKC has resisted a planning use class of 'live-work', because of concerns that this form of planning permission can be exploited when applied to specific buildings or floorspace. But to resist the concept of 'live-work' streets in which employment activity sits alongside or below residential accommodation is viewed by the StQW Forum as damaging to sustainable development and as contrary to the principles of the National Planning Policy Framework.</p> <p>5.5 A restrictive policy framework has contributed to the decline of Latimer Road - a decline which may be slowed for a period as the UK economy picks up but which all the evidence suggests will resume once again at subsequent stages of the economic cycle. Businesses and residents want to see change come to Latimer Road, and feel that this part of the Borough has been held has suffered enough from the consequences of planning policies which have not achieved their intended outcomes.</p> <p>5.6. There are existing building owners in the street who have been working with the StQW Forum and who are committed to bringing about change, refurbishing and redeveloping existing buildings, retaining the commercial space that works well, and bringing in a wider range of activities and uses.</p> <p>5.7 While the Issues and Options paper floats policy options which could to an extent alleviate the situation, these are seen as late in the day and insufficiently responsive to market forces. Table 2.1 of the Issues and Options paper, stating in relation to the Freston Road/Latimer Road EZ that 'the office market is tight with high occupancy and high rents' is dangerously misleading as a basis for Core Strategy policy revisions. This statement is drawn from the PBA study but is a highly selective quote given the many other statements (and rental figures) from this same study, as referred to earlier in this consultation response.</p> <p>5.8 'High occupancy and high rents' may be an accurate descriptor for the Freston Road part of the Employment Zone. It is not for Latimer Road. The Council would be on dangerous ground if it formulates 2014-25 Enterprise policies on the basis of such assertions, as opposed to listening to the evidence provided by the local business and residential communities.</p>	
Woofie Ltd (Tanya Sarne)		Given the difficulty I have had in renting out two beautiful units in 329 Latimer Rd, there doesn't seem to be a huge demand for commercial premises in Latimer Road. I've had to accept an extremely low rent which doesn't even cover my expenses.	Noted. The Local Plan considers the relevant policies for the Borough as whole and for areas within it. The Council is satisfied that Latimer Road is a viable office location and as such it is

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			appropriate to protect the stock of busies uses within it.. However, the individual circumstances of a specific policy will be considered as and when a planning application is made.
Chadi Semaan		In general, we should relax commercial uses. The way we shop and use services has changed. There is no reason that we cannot have gyms and crèches and medical services next to convenience stores. A general relaxation of the use classes will lead to us having a more utilized and efficient community with people interacting as services are closer by (something the previous generation had through their use of old grocery stores before the large shopping malls and the internet changed the way we go about daily life and shop)	<p>The Council notes the consultee’s support for a more liberal approach to allow changes of use across the use classes. In practice much of the pressure for development is for changes of use to residential, rather than between the commercial uses.</p> <p>The Local Plan does allow some flexibility within the town centres, though does recognise the importance of maintaining retail uses in these areas. These are the uses which drive our town centres.</p>
DP9 LTD (Hannah Willcock)	DP9 LTD	<p>Our client supports and welcomes the options (Q1.2, Q2.3 and Q2.6) that would allow for greater flexibility to allow for a loss of employment floorspace with no re-provision where the loss is outweighed by other planning benefits, particularly social and community benefits.</p> <p>In addition, the NPPF directs Local Planning Authorities to 'recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites'. Central Government clearly recognise the role that mixed use development can have in creating sustainable communities and we urge that Council take this into account when finalising their policies.</p>	<p>The Council will consider the individual merits of a case as and when an application is made. The role of “enabling development” is one such consideration. The Council strongly supports the creation of new social and community uses, particularly when these may have a national as well as a local role.</p> <p>The Council, and the Local Plan recognise the role that town centres can have in accommodating a range of uses. These include business uses, social and community uses as well as residential.</p>
DP9 Ltd (Rachel Crick)	DP9 Ltd	<p>4.1 As set out above, our client strongly supports Options 1.2, 2.1, 2.3, 2.4, 2.6, 2.8, 3.3 and 3.4 as these changes would:</p> <ul style="list-style-type: none"> • seek to promote flexibility • deliver high quality business spaces, in an appropriate locations (relocation of uses) • promote sites for redevelopment • drive regeneration in the north of the Borough (in accordance with the Core Strategy) • support the delivery of social and community uses • increase the potential provision of housing and affordable housing • support sustainable mixed use communities <p>4.2 On the other hand we strongly object to proposed Options 1.1, 1.3, 2.2, 2.5 and 3.1, which, if progressed, would be overly prescriptive in relation to delivery of particular types of units and would not provide sufficient flexibility to encourage new employment development to come forward.</p> <p>4.3 Whilst we are encouraged by the Council's review of the existing policy position in relation to enterprise issues, in accordance with the NPPF we urge the Council to reconsider their current resistance towards the loss of any employment uses, as protection of offices cannot be supported for its own sake. Wider opportunities can arise as a result of greater flexibility in relation to the loss of employment uses, and the suitable uses in employment zones, which would provide an overall positive benefit for the borough, and in particular North Kensington.</p>	<p>The Council and the Local Plan do not support the retention of business uses for their own sake. The Council is satisfied that the Borough’s offices play an important contribution to the local and the wider economy. Loss will be driven through a differential in value rather than through any weakness of the business market itself.</p>
Tania Martin		<p>RBKC is a very rich borough, but does not do enough to help employment/regeneration in the North of the borough. Transport access is very limited, which doesn't help the problem – eg; getting to Notting Hill is a complicated and long route. This area is in desperate need of rejuvenation, which would be helped by relaxing Employment Zone restrictions on Latimer Road.</p>	<p>The Council is strongly supporting the creation of a new Crossrail station in Kensal. This will significantly improve public transport accessibility in the area.</p> <p>“Relaxation” of restrictions on Latimer Road will result in the loss of business floorspace - given the differential in value between office and residential uses. Such an approach will not support rejuvenation in the area.</p>

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Laura Michaud		<p>As a local resident for 10 years and part of the younger generation that have chosen to live in RBKC and raise a family here, I find it hard to understand why a borough that has so much about it that is good maintains such backwards thinking when it comes to commercial space.</p> <p>The situation for me seems very clear. The manner in which people go about their shopping has changed from when I was a child. People shop online, the need for local grocers, fishmongers and butchers by the community has nearly completely vanished (unfortunately). But, the situation must be accepted, people aren't going to return to shopping in the way that my parents did.</p> <p>Consequently, we need to adapt our parades of shops to this change in demand. We need shops that people actually use. North Pole Road and St Helen's gardens have commercial premises in their shopping parades that have been empty for years. One of them 20 years. How can we allow this to continue another 20 years? If we don't allow commercial premises that are more frequently used into these units, they will remain let and will remain an eyesore that attracts anti-social behavior. Either allow a gym, crèche, physiotherapist, dentist to use the space, or if there is still no demand for that, allow it to be converted into a flat. We certainly need more housing in London! Parades of shops will shrink... with shopping centres like westfield and even the huge increase in the large supermarkets and online shopping, how can they possible survive to the same extent?</p> <p>Commercial office space in Latimer Road is also underused. This road is ripe for fly tipping and muggings. Why? Because at night time, no one dares go down it. I would never walk down that road after dark, because there isn't anyone on it. No one lives there, so no one goes there after dark. The few employees that work there have no choice of places to go to eat, it is hard to get to in terms of transport links, so people have to drive (which puts a strain on our parking). There are many units that are vacant and many units that attract low quality tenants that offer little to the immediate area (they don't use our local shops for example as they are too far away).</p> <p>If we reduced the amount of commercial space and allowed some of it to be converted to residential, the natural progression that Latimer Road has craved for the last 15 years would happen without any need to manage it. An improvement to the transport links would naturally help the road to feel more "alive" and make it a nicer and indeed safer place to be.</p> <p>At the moment, the cost to the local community of keeping it underused is huge. Fly tipping, muggings, graffiti are all socio/economic costs that are a bi-product of the space being poorly utilised</p>	<p>Whilst the Local Plan has policies which resist the loss of retail units within neighbourhood centres the Council has, and will continue to consider the merit of the loss of a particular unit as and when an application is made. There is no value in refusing the change of use of a unit when there is no realistic prospect of it being used for its last use.</p> <p>The Council does not recognise a position whereby commercial use is "under used" in Latimer Road. The area is a vibrant commercial area with very low vacancy rates. This has been considered by the examiner at the examination into the StQWNP who concluded that Latimer Road is a viable office location.</p>
Maeda Friederike		<p>Due to the basic character of our borough (densely populated , mostly residential) it is clear that the possibilities for introducing new manufacturing industries is virtually nil . Where light industry is introduced (in the borough's development areas ; former brownfield sites ?) great care must be taken to ensure that local residents do not suffer detrimental health effects and/or loss of quality of life .</p> <p>While it may be very desirable to create additional job opportunities , the benefit of this must be fairly judged against the possible risks to residential areas close by , be they privately owned dwellings or social housing .The way forward seems to lie with various branches of the service industries , be they office spaces of varying sizes , hotels or retail enterprises . Even with those care must be taken , not to further increase disruption or loss of quality of life for existing residents .</p> <p>In this context I should like to mention the impending addition to the NPPF , which will advise local councils , to give serious consideration to any projects that would bring about increased vehicular traffic against the background of already largely very poor air quality.</p> <p>Re office or retail spaces that are claimed to be non-viable , perhaps some deal could be done with NPOs to let start-up businesses or community projects make use of them .</p>	<p>The Council recognises that the creation of new industrial uses can have the potential to conflict with those living within the Borough. Any such application will be considered using all the polices within the Local Plan. This includes those concerning noise and nuisance.</p> <p>The Council concurs with the view of the consultee that existing office uses should be protected.</p> <p>It is beyond the remit of the planning system to broker deals, however beneficial that may be.</p>

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		RBKC should make a righteous effort to continue to resist change of use from office to residential . Obviously from a commercial point of view , residential space pays considerably more than office space . Therefore there is a great temptation to try and and pursue the creation of residential dwellings by almost any means.	
Golborne Forum		<p>Overall, the Forum supported in 2012 and continues to support in 2014 the broad thrust of the Enterprise Core Strategy Review to make the Borough more business friendly. The Forum welcomes the opportunity to comment on the issues raised in the Enterprise Core Strategy Review from the perspective of how they will affect people living and working in Golborne.</p> <p>We note that Golborne is the joint most disadvantaged ward in London with a high rate of unemployment, particularly among youth and high levels of poverty. Our comments need to be seen in that context as the priority so far as Golborne is concerned is to create jobs for local people and enable residents to benefit from improvements to the local economy and increased prosperity. Alongside this there is a need to provide high quality life-long education and training, which will help to increase the economic prosperity and well-being of local residents.</p> <p>5, We welcomed the recognition in the 2012 report of Kensal as the Borough's biggest employment zone and the Borough's support for employment zones such as Kensal. We also support the creation of more potential employment as a result of the gasworks site redevelopment. We do have some concerns, however, about whether or not the main industries in the area provide many jobs for local people. Although we have no hard evidence either way there are indications that many workers come from outside the area – as seen by the significant number of people alighting from the underground stations at Ladbroke Grove and Westbourne Park in the mornings and heading into Golborne from Ladbroke Grove or over the footbridge from Tavistock Crescent.</p> <p>We believe that, as a part of future developments, efforts should be made to address this. We therefore welcomed the suggestion in 2012 that the Borough should promote employment opportunities for local people particularly those currently unemployed. This could be achieved in two ways, helping local residents gain the skill sets required by existing local businesses and encouraging the development of new businesses that more closely match the existing skills of local residents. We believe that one potential way forward might be a joint working party involving the Borough, local employers, residents, schools and Kensington and Chelsea College to address these issues and help local people to gain the skills required via training, apprenticeships and personalised employment support. The creation of a new Academy in North Kensington with a focus on enterprise and which takes some students from Golborne is a very helpful development in this context.</p> <p>We note the wide variety of local workspaces in the area and also, with the exception of the gasworks site, that there are few opportunities for expansion. We also note that some premises whilst let at local market rents (for example Westbourne Studios) may still be beyond the means of many small start-ups, micro businesses or businesses in industries with low profit margins. In order to try and address these two issues, availability and affordability, we propose that consideration be given to developments of unused or under-used car parking under residential buildings as was done with Baseline Studios in Notting Barns ward. In Golborne, Holmfield House, Trellick Tower and 36 Oxford Gardens are examples that potentially would seem to offer the possibility for this type of development at a relatively modest cost which would be reflected in lower rents. The recent establishment of the Goldfinger Factory at the base of Trellick Tower offers a splendid example of social enterprise.</p>	<p>Support for protection of the Employment Zones noted. The Council concurs with the view of the consultee that these areas, and indeed the rest of the Golborne area play a significant contribution to the Borough's economy.</p> <p>The Council notes that the consultee wishes to try to increase the employment opportunities for those living in the local area. Maintaining a variety of unit types may assist in this aim, although the Council is of the view that not limiting the size of units may bring forward more new development, to the benefit of the economy. New business development rarely comes forward unbidden – a reflexion in the differential value between residential and any other land use. Further restrictions as to the types of new business units may compound this problem further.</p> <p>New large development in this part of the Borough does provide assistance, be this through payments or work placements, to construction training for local people.</p> <p>The Council owns and runs two business centres intended to support businesses. This is managed by the Council's regeneration team.</p>
Jane Heffron		<p>Business Uses There is a difference between 'mom-and-pop' shops and handy stores, such as small grocers or tailors and such, that neighbourhoods need and want, and those businesses not related to a neighbourhood which could be located anywhere.</p> <p>I think a key point that relates to all of your questions about Business Uses is that residents and businesses use neighbourhoods differently. A residential neighbourhood with a business component is livelier and can be fun and vibrant. But it has to be managed to preserves the quality of residential life. Businesses close up and go home at</p>	<p>The Council recognises that businesses and residents can be in conflict with one another. However, without the businesses the Borough will become a residential-only area, lacking the very facilities which make the Borough the place that it is.</p> <p>The Council recognises that there is an acute need for new housing. However, it is satisfied that it is meeting its housing</p>

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		<p>night. Residents return and remain. Thus, businesses care less about litter, rubbish, security, noise, clutter, visual pollution such as signs, all the triggers that can upset residents who expect quiet enjoyment of their homes. London is a tourism mecca in part because of the way it LOOKS. Unless you want to lose that, it has to be protected.</p> <p>Here is an example: on the west side of a street called Ashburn Gardens is a cute little hotel called the Villa Kensington. It sits in a row of beautiful London houses now mostly broken into flats, but some done over. For reasons I do not know, the Villa Kensington was allowed to replace period doors with glass doors, and to light itself up with a neon sign. Anyplace else, this would look cute. It is cute...but it does not look like Kensington in London. It could be anywhere. And that is the point. It has lost identity as an example of what is London and of the environment that people swarm to London to see.</p> <p>Businesses and the issue of housing demand: the fact that people who work in London want to live in London is a good thing. You do not want dead environments at night as businesses shutter up for the day and leave the streets empty. But the demand for closer-in housing seems hindered by the amount of housing held off of the market because of business use (or hotels). I live in a street where a good supply of fine family houses is going to waste because some have businesses on the ground floors that cannot get permission to convert to residential. That seems unfortunate.</p> <p>Comment: It feels as though we are inundated with hotels and all the problems associated with them. I think the Council does not realize how angry residents are becoming with the litter, the rubbish, the idling taxis, the too-big buses on residential streets, the loss of greenery, the tart cards, not to mention the bad architecture. People are really angry. They see their environments degrading on a daily basis. Who wants to walk their children every morning and night past phone boxes plastered with tart cards? Tourism interests seem to be pushing deeper into town, into otherwise residential neighbourhoods. Perhaps it is inadequate cleaning or a lack of enforcement, but there seems to be a degradation of residential areas.</p> <p>Short lets (illegal ones) are an example: these are businesses that take needed housing off the market. A key point that gets missed is this: the revenue from short lets goes to an absentee owner while the risk associated with short lets falls on neighbours. It is not just the noise, the extra or wrongly-handled rubbish, litter, the rolling in and out of suitcases, the lack of security, lack of regulation, it is the risk that somebody unsavoury or something dangerous or unsocial might take place. Resident neighbours are exposed to all of that risk and inconvenience. There is an economic issue here: the unreimbursed cost to neighbours of having to put up with unlawful short let properties. If short lets cannot be stopped, then owners should be required to pay compensation to neighbours for the misery and risk to which they are being subjected.</p>	<p>target, and as such it would not be appropriate to see the widespread release of business accommodation.</p> <p>The Council notes the concerns about litter, traffic etc.</p> <p>The Local Plan resists the loss of any permanent residential accommodation to short term lets. However, under the Deregulation Act of 2015, the Council has less control over such uses than it once did.</p>
Port of London Authority		<p>During the early 1990's, the PLA became aware that a disproportionate number of operational wharves in London were being redeveloped for alternative, higher value uses. Research undertaken by the PLA indicated that between 1987 and 1994, over 20 operational wharves had been redeveloped with a resultant and permanent loss in cargo handling capacity.</p> <p>The PLA and the London Planning Advisory Committee (LPAC) were instructed by Government to prepare a list of wharves for protection. This work was presented to the River Thames Working Group and ultimately resulted in the publication, in February 1997, of Regional Planning Guidance Note 38/98 (Strategic Planning Guidance for the River Thames). This Guidance refers to the need for wharf protection on the River Thames in London at Paragraph 3.52, which states that:-</p> <p>"Many sites for freight transport and other river-related uses are under development pressure or have been lost within recent years: they are a diminishing and finite resource."</p> <p>The strategic policy context underpinning the principle of safeguarding riparian wharves in London was provided at paragraph 3.53, which states that: -</p>	<p>The Council recognises that Cremorne Wharf has a "safeguarded status". This is noted in the relevant place chapter. Any future de-designation will be a process separate from that of the Local Plan Partial Review.</p>

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		<p>"The Secretary of State therefore considers it is important in the broader strategic interest that some sites which are currently, or could potentially be, used for the transshipment of freight, including waste and aggregates, and for river related activities, should be retained and safeguarded against development that could preclude their future use for these purposes ."</p> <p>To accompany RPG3B/9B the Secretary of State for the Environment identified 32 wharves suitable for cargo handling that should be safeguarded. Directions were served to Local Planning Authorities under Section 12 (7A) of the Town and Country Planning Act 1990 (which required authorities to have regard to the maintenance of specified wharves in formulating their development plans) and under the Town and Country Planning (General Development Procedure) Order 1995 (SI 1995/419) concerning the handling of any planning applications received for these sites.</p> <p>On assumption of his planning powers in July 2000 through the Town and Country Planning (Mayor of London) Order 2000, (SI 2000/1493) (now replaced by the Town and Country Planning (Mayor of London) Order 2008), the Mayor was required to be consulted on planning applications affecting any part of a safeguarded wharf. The Mayor was also given power to direct local planning authorities to refuse planning applications affecting any part of a safeguarded wharf. New directions, reflecting these statutory changes, were served on relevant local planning authorities.</p> <p>The Directions play an important role in protecting lesser value uses - enabling the wharves to be retained for the purpose for which they are protected: waterborne cargo handling uses. Once a wharf is lost, it is lost forever. The Mayor of London indicated in Towards the London Plan, published in 2001, that the status of both the extant and other wharves proposed for safeguarding would be reviewed periodically.</p> <p>The London Plan Implementation Report: Safeguarded Wharves on the River Thames was published in January 2005, and submitted to the First Secretary of State for his consideration. The report recommended that of the 28 wharves safeguarded at the time, 25 wharves, should retain their status. A further 25 wharves , principally located downstream of the Thames Barrier were also recommended for safeguarding.</p> <p>It was confirmed, in June 2005 , that the First Secretary of State concurred with the Mayor of London's recommendations contained within the Implementation Report, and accordingly issued new directions where appropriate so as to formally safeguard a total of 50 wharves.</p> <p>In accordance with commitments made within the published (2011) London Plan the Mayor, together with his project partners, commenced a review of all the safeguarded wharves within London and to consider whether it is appropriate to safeguard facilities on the canal network. A consultation document was subsequently produced in October 2011 entitled Safeguarded Wharves Review 201112012. As a result of consultee comments and to provide clarification and updates in terms of national policy, a second more limited consultation was undertaken in 2012 . The resultant document, Safeguarded Wharves Review Final Recommendation- March 2013 is now with the Secretary of State for approval. Nine safeguarded wharves are recommended for release and one additional wharf is proposed for safeguarding.</p> <p>London Plan policy 7.26 protects safeguarded wharves for waterborne freight handling uses only; supports proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves currently not handling freight by water and; requires developments adjacent or opposite safeguarded wharves to be designed to minimise the potential for conflicts of use and disturbance.</p>	