

Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

November 2014 Issues and Options: Enterprise

Qu1: What planning policies should the Council adopt which will help to bring forward new business development?

Name	Company / Organisation Name	Q1.1 Option one: The Council should require business floorspace to be provided as part of new large scale residential developments.	Q1.2 Option two: The Council should support the loss of employment floorspace in one building as long it is being re-provided elsewhere in the Borough.	Q1.3 Option three: The Council should be prescriptive and require the provision of those particular types of unit which would meet the specific demands of the Borough's office sector.	Comment
Mizzi	Latimer Studios	Mixed use is very important to keep RBKC vibrant, business should be encouraged as part of new large scale residential developments	Areas should be mixed use – not ghetto-ised	It is important to be flexible rather than prescriptive	<p>The Council supports the principle of mixed use development across the Borough. It also seeks greater flexibility of unit types, with the amended Local Plan being less prescriptive about the nature of business uses which may be appropriate in different locations.</p> <p>This includes support for the introduction of residential uses within the Employment Zones where the employment offer of the property is significantly improved.</p>
Town Planning Services (Chris Green)	Town Planning Services	No comment.	While the provision of 'replacement' floorspace might appropriately justify the loss of employment elsewhere, any such requirement should be unnecessary, and goes beyond the requirements of the NPPF. For the reasons set out below, we consider that a more flexible and positive approach should be adopted overall.	<p>The NPPF states that the presumption in favour of sustainable development means that (amongst other things), development plans must be sufficiently flexible to adapt to rapid change. We consider that any attempt to require particular types of unit would fail to afford such flexibility.</p> <p>The timescales involved in monitoring supply and demand, and subsequently reviewing and changing development plan policy, will mean that the development plan is unable to keep pace, and adapt to changes in the market.</p>	<p>The Council recognises the importance of its B class business sector and the contribution that it makes to the wider and the local economy. As such it is essential that it has the policies in place which resist the loss of B class uses.</p> <p>The Council does, however, share the consultee's concern about the need for flexibility, and does not intend to be prescriptive about the nature of B class business units which should be provided in a given location. Regard will be had to the impact that a use may have upon traffic generation, but there will not be any "in principle" objection to the location of larger offices outside town centre locations, where the uses can be shown to meet the requirements of the NPPF and its sequential test for town centre uses. This reflects the nature of the Borough and that nowhere is "inaccessible" in real terms.</p>
Earl's Court Society (Malcolm Spalding)	Earl's Court Society	Yes Especially Earl's Court	Case by case basis – maintain balance	Yes - Not Estate Agents or Betting Shops or Pawnbrokers	Noted.

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K&C CHAMBER of COMMERCE (SPALDING)	K&C CHAMBER of COMMERCE	Yes at least 2,500 m2 pa	Yes but only 50% of the loss – 50% retained.	Not policy – but part of pre-application advice.	<p>Noted. The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council does not object to the principle of land use swaps per se. The supporting text to Policy CF5 does however note that where reducing diversity, land uses swaps can be problematic.</p>
Jo Sherrard		No comments	No comments	No comments	Noted.
Wentworth Andersen (Mr Biggin)	Wentworth Andersen	Yes, but small in scale	Yes – providing the flexibility delivers additional benefits relevant to the scale of the off-siting	<p>Yes – though this should have more frequent reviews placed on the analysis of office needs.</p> <p>Current enterprise review has taken a very long time to come forward.</p>	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council endorse greater flexibility in the provision of business units. This must not however result in the net loss of existing B class floorspace or see a reduction on the diversity of that stock within the Borough.</p> <p>The Local Plan does not intend to be prescriptive about the nature of business uses which may be appropriate in different locations. The Council is reluctant to attempt to second guess the needs of the office market.</p>
Gerald Eve LLP (Neil Henderson)	Gerald Eve LLP for Cadogan Estate	<p>Whilst the Estate generally supports proposals which encourage mixed and balance communities, the Estate would not support a policy basis which seeks to set minimum floorspace requirements for specific uses as part of large scale redevelopment proposals.</p> <p>The Estate considers this approach raises a number of significant concerns as follows:</p> <p>a) The vast majority of</p>	<p>Q1.2 Option two: The Council should support the loss of employment floorspace in one building as long it is being re-provided elsewhere in the Borough.</p> <p>Within the supporting text of the Consultation Document, the proposition of this option appears to be concerning the freeing-up of land in a high value area and relocating the use to a lower value area. The document highlights the risk of this approach in reducing the diversity and mix of uses within</p>	<p>Q1.3 Option three: The Council should be prescriptive and require the provision of those particular types of unit which would meet the specific demands of the Borough's office sector.</p> <p>The supporting text within the Consultation Document states that the Council can either rely on the market to provide the right type of premises in the right location or it can be more prescriptive and try to second guess the sector's requirements. It is suggested that a cautious approach should be taken to being prescriptive on the requirements</p>	<p>The Council concurs with the views of the consultee.</p> <p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council endorses greater flexibility in the provision of business units. This must not however result in the net loss of existing B class floorspace or see a reduction of the diversity of that stock within the Borough. It notes that an overly prescriptive approach</p>

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		<p>development sites in RBKC are already highly developed and in order to incentivise redevelopment to occur, in the majority of cases, additional floorspace and/or significant additional value through the creation of higher value land uses, would need to be achieved. A requirement to provide a lower value land use, will risk schemes becoming marginal or sterilising sites from coming forward which would otherwise result in the deliver)</p> <p>b) Due to the already significant development densities within the Borough, and the fact that the majority of lot sizes are relatively small, in the majority of cases, it will be difficult to achieve successful mixed use schemes without unacceptably compromising quality of accommodation, efficiencies of floorspace or investment values. Cadogan have significant experience of managing historically mixed use buildings and understand the difficulties they present. Indeed, it is as a result of this experience that the Estate is continually seeking opportunities to rationalise these use through use swaps that create single use buildings y of much needed new homes.</p>	<p>a particular area.</p> <p>The Estate would not support a policy which sought to relocate land uses from one area to another where there was clearly a significant disparity in the value of the relative areas.</p> <p>However, in circumstances where the relocation takes place within the proximity of the site, or to another comparable area of land use value, this can prove highly effective in achieving more efficient use of building stock and better accommodation overall.</p> <p>The Estate has undertaken a number of applications which have resulted in the relocation of employment uses in order to achieve a better rationalisation of land uses. For example, in many buildings, uses have developed over the passage of time which can result in multiple uses within a single building creating unplanned and inefficient use of building stock. If rationalisation of these uses through relocation to other buildings can be achieved and this results in a better disposition of those uses, then this should be supported. However, on the basis that this type of application has already been achieved successfully by the Cadogan Estate, the Estate does not consider there to be any need to amend or promote a revised policy to achieve such an aim.</p>	<p>of any office floorspace as this has significant potential to dis-incentivise Developers from investing in this type of use. The current policy approach seeks to encourage flexible business accommodation that can meet a variety of requirements for small, medium and large offices. The Estate considers this existing policy approach adequately allows for the market to adjust in the future to effectively and efficiently meet market demands as they evolve. It is important that the priority for delivering new employment floorspace is not unintentionally thwarted by dis-incentivising Developers through onerous requirements.</p> <p>The Estate would therefore not support a prescriptive policy approach to the provision of particular types of office unit.</p>	<p>and an attempt to second guess the market is unlikely to prove helpful.</p>
St Quintin and Woodlands Neighbourhood Forum	St Quintin and Woodlands Neighbourhood Forum	No specific comment on Qu 1			Noted.

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(HENRY PETERSON)					
Golborne Forum (Susie Parsons)	Golborne Forum	1) Q.1.1 and Q 1.2 Option one is that the Council should require business floorspace to be provided as part of new large scale residential developments and Option two is that the Council should support the loss of employment floorspace in one building as long as it is being re-provided elsewhere in the Borough. The Forum considers that these options are not mutually exclusive. It is stated that the Council will have to decide if a scheme should make a full contribution to affordable housing or to provide for the needs of the business sector – we see this as a false dichotomy. It is perfectly possible to create schemes which provide both affordable housing and employment.		2) Q.1.3 We are concerned that there seems to be conflation in the 2014 Review of business use and office space, whereas there are a multiplicity of business uses, not just for offices. It is stated that the Council has been taking a light touch to try to encourage the creation of new office floorspace and has rarely been prescriptive as to the nature of new business floorspace. We would suggest that the Council should be more prescriptive and should encourage other forms of business than offices, such as light industrial units, which have the potential to generate employment for local people.	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets. The Council will not, however, resist the provision of B class uses where proposed.</p> <p>The Council notes the view of the consultee that a range of business uses, including light industrial uses, should be protected. Such variety will maximise the potential to generate employment for local people. The Local Plan will, however, take a more pragmatic approach and allow changes of use through the B classes. This reflects the practicalities of the Borough's business market and of long established freedom allowed by planning regulations to change from a light industrial use to an office without planning permission.</p> <p>The emphasis is on maintaining those B class uses that we have – and the contribution that these have to the local and wider economy rather than meeting particular local employment needs. This flexibility should help ensure the retention of B class uses "in the round".</p>
Woofie Ltd (Tanya Sarne)	Woofie Ltd	The Council should require business floorspace to be provided as part of new large scale residential developments	Council should not support the loss of employment floorspace in one building as long it is being re-provided elsewhere in the Borough	The Council should be prescriptive and require the provision of those particular types of unit which would meet the specific demands of the Borough's office sector.	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council endorses greater flexibility in the provision of business units. This must not however result in the net loss of existing B class floorspace or see a reduction on the diversity of that stock within the Borough. It considers that a prescriptive approach and an attempt to second guess the market is unlikely to prove helpful. Flexibility within the B classes is more likely to meet the specific demands of the Borough's office sector.</p>

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Chadi Semaan	N/A	<p>Q1.1 Option one: The Council should require business floorspace to be provided as part of new large scale residential developments.</p> <p>The council should ensure residential floorspace is provided wherever possible. It is needed more than anything else.</p> <p>In particular there are many vacant shops and office units in North Kensington (Latimer Road, North Pole Road & St Helen's Gardens). This gives the area a run down feeling.</p>	<p>Q1.2 Option two: The Council should support the loss of employment floorspace in one building as long it is being re-provided elsewhere in the Borough.</p> <p>Again, the council should initially ensure that we have enough housing to meet the demand. There is little demand for what were once green grocers and post offices. Since these premises have been in decline, nothing has replaced them, and the logical next step would be to allow residential use. The same scenario for large office units that are let to a company with just a couple employees, or not let at all. Latimer Road has seen the areas around it gentrify, but with such poor transport links and services, it will always struggle. This road in particular would benefit hugely from some additional residential space to take over the vacant office space.</p>	<p>Q1.3 Option three: The Council should be prescriptive and require the provision of those particular types of unit which would meet the specific demands of the Borough's office sector.</p> <p>The council should be less prescriptive. This would allow as great a use for the vacant spaces as possible. The area needs life to be brought to it, and its poor transport links already mean that it faces an uphill battle.</p>	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council does not concur with the view that "Latimer Road will always struggle" as a business location. A 2015 survey indicates extremely low vacancy rates, significantly below the level expected for an effective property market. Indeed this very issue was considered by an independent inspector at the examination into the StQWNP. He concluded that, "the viability evidence does not suggest to me that the continuing employment uses in this part of the zone are not viable."</p> <p>The Council endorses greater flexibility in the provision of business units. This must not however result in the net loss of existing B class floorspace or see a reduction on the diversity of that stock within the Borough. It considers that a prescriptive approach and an attempt to second guess the market is unlikely to prove helpful. Flexibility within the B classes is more likely to meet the specific demands of the Borough's office sector.</p> <p>The Local Plan does support a greater diversity of uses within the Latimer Employment Zone. These uses must not, however, be at the expense of the business character of the area. These uses will include some residential as well as a range of A class or other town centre uses.</p>
Clobb Properties Ltd (Richard Ehrman)	Clobb Properties Ltd	No. London is facing a housing crisis, not an office crisis. Housing should be the absolute priority.	No, the priority should be more housing.	Flexibility is the key to economic growth. Official attempts to micromanage businesses have a poor track record	<p>Noted. Whilst the Council recognises that there is a need to provide housing this should not be at the expense of all other uses. The Council is satisfied that it can meet its housing target and has a five year housing supply. That said, the Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments (outside those allocations for the major strategic sites). This approach may undermine the viability of such proposals.</p> <p>The Council concurs with the view that attempting to micromanage business units may prove</p>

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					counterproductive. Flexibility is important if the market is to provide the units in demand at a given time.
Kerry Davis-Head		Not necessarily.	No. This may encourage conversion to residential to the detriment of the local area. The mix of residential and small business makes this (lots village) a vibrant area in which to live and it must be the same elsewhere in the borough	yes. And to be specific and sensitive to the particular areas/zones	The Local Plan will resist the loss of B class uses as such uses are seen as vital to both the local and wider economy as well as helping contribute to the diversity and the character of the Borough. Swaps may only be appropriate where diversity of uses is not harmed. Diversity of uses, including that within a specific area, is a central ambition of the Local Plan.
Cremorne Residents' Association of Lots Village (Davis-Head)	Cremorne Residents' Association of Lots Village	Q1.1 Option one: The Council should require business floorspace to be provided as part of new large scale residential developments. We would be opposed to the loss of any further employment floorspace in LREZ. Relocation of small enterprises to elsewhere in the Borough would undermine the viability of the existing cluster on businesses in LREZ, the existing mix works well and the unique units along Lots Road, for instance, form a link between Chelsea Design Quarter and Chelsea Harbour Design Centre	The council should seek to understand better the accommodation needs of the existing business cluster in the LREZ, and recognise that encouraging the refurbishment of existing business premises can play a role in meeting such business needs without the disruption of creating entirely new buildings, particularly when the older buildings have more charm. Additional workspace can often be provided for smaller business by reconfiguring the building This refurbishment route is the one we would favour now that Lots Village Conservation Area has been established. Only very high quality new schemes/ new facades etc should be considered	No comment	The Local Plan will resist the loss of B class uses as such uses are seen as vital to both the local and wider economy as well as helping contribute to the diversity and the character of the borough. Non-business uses may be appropriate within an Employment Zone but not when these are to the detriment of the business function of these areas. Residential uses will only be appropriate where allowing a significant uplift in business floorspace. Some flexibility will, however, be appropriate. Reconfiguration can allow the ongoing future of business premises.
333 Latimer Road (Corrett)	333 Latimer Road	Homes would be a better use of the space	You might end up with a lot of offices in poor locations	Demands change. Unlikely the Council could second guess the market	The Council is satisfied that none of the Borough is inherently unsuitable for offices. However, the Council does concur with the view of the consultee that it would not be appropriate to require offices to be provided as part of large retail proposals. Such an approach could ham the deliverability of housing schemes and may harm the Council's ability to meet its housing targets. The Council concurs with the view that attempting to micromanage business units may prove counterproductive. Flexibility is important if the market it to provide the units in demand at a given time.

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DP9 LTD (Hannah Willcock)	DP9 LTD (For Royal Brompton NHS Trust)	<p>Whilst we can recognise the Council's intention in Option one by "requiring business floor space to be provided as part of new large scale residential developments" each scheme should be looked at on its own merits. In most instances, and where viable, developers will look to provide a mix of uses in order to provide for a stronger neighbourhood character and a sense of place. Therefore, it would seem unnecessary to prescribe the provision of business floorspace as part of all large scale residential developments within policy, particularly as the Council recognises that it may impact upon the overall viability of the scheme.</p>	<p>Q1.2 Option two states that 'the Council should support the loss of employment floorspace in one building as long as it is being re-provided elsewhere in the Borough' encourages the provision of additional high quality employment floorspace in locations that are deemed to be more suitable. Further opportunities available for potential purchasers or vendors elsewhere in the Borough could unlock potential office development opportunities in areas that are better suited and are in greater need of employment floorspace. However, in some circumstances the Borough should provide 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>As previously outlined, the redevelopment of parts of the Chelsea Masterplan sites for residential will generate a significant uplift in value. This then enables the Trust to increase the proportion of social and community floorspace on the Hospital site, which will lead to an increase in floorspace and additional job opportunities. For example, the loss of employment floorspace at 250 Kings Road will not necessarily mean there will displacement of jobs, and may in fact, create further job opportunities at the hospital than already provided at 250 Kings Road.</p>	<p>Q1.3 Option three proposes that the Council should provide "particular types of units to meet the specific demands of the Borough's office sector." We do not support this approach and, similar to option one, think it is too prescriptive and could lead to a negative impact on the office market. The demand for a particular office space will be dependent on the market needs at that time. If the demand for a particular type of unit is high, then the Council should be able rely on the market trends to provide the right type of premises in the right location. Option three would be contrary to NPPF paragraph 21 which outlines that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.</p>	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council does not resist all business land uses swaps per se. However, swaps will be resisted where the overall diversity of the business floor space offer would be harmed. This could be both in terms of location as well as quantum.</p> <p>The Council supports both the protection and promotion of social and community uses. A pragmatic approach is taken where an existing office will be lost to a social and community use. The acceptability of such a proposal will be related to the nature of the social and community use. A specific policy supporting changes of use of office to social and community uses may have unintended consequences. It may encourage such proposals – rather than support those which come forward in their own right.</p>
DP9 Ltd (Rachel Crick)	DP9 Ltd for 60 SA Ltd	We object to Option One which states that 'The Council should require business floorspace to be provided as part of new large	3.4 We strongly support Option Two, which states that 'the Council should support the loss of employment floorspace in one	We do not support Option Three which proposes that the Council take a prescriptive approach that requires 'the provision of those particular types of	The Council concurs with the view that attempting to micromanage business units may prove counterproductive. Flexibility is important if the market it to provide the units in demand at a given time.

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		<p>scale residential developments' as we consider that it is not appropriate in all circumstances to provide a mix of uses within large residential developments, as in many cases it may not be viable to provide a mix of residential and business floorspace within one building.</p> <p>3.3 A requirement to deliver employment floorspace as part of a residential scheme would be likely to adversely impact on the scheme's ability to support affordable housing provision. In addition, providing a mix of residential and employment uses can result in the fragmentation of ownership of the site and often require different management structures for separate uses. In addition, mixed use schemes often make inefficient use of space as a result of the requirement for two separate entrances, cores and servicing areas, resulting from two separate uses in the building.</p>	<p>building as long as it is being re-provided elsewhere in the Borough'. We consider that this would encourage the provision of better quality employment floorspace in suitable locations, such as in the north of the Borough, which requires significant investment over the plan period. The PBA report identifies that the main hindrance to economic growth is the lack of opportunities in the borough for significant office development, and we consider that a more flexible approach to re-provision of office space elsewhere in the borough would unlock potential office development opportunities in areas such as employment zones.</p> <p>3.5 We consider that areas such as South Kensington which are not strategically important employment areas, as recognized by PBA who consider that the South Kensington area is 'mainly an upmarket retail and residential location, in which offices are not a primary function. There are no significant office buildings in the area' (paragraph 4.144), it would provide a positive policy position to support the loss of employment floorspace if it were to be re-provided elsewhere.</p> <p>3.6 The Council should remove the current protection of all light industrial uses in the borough, including within employment zones. PBA have identified that within previously industrial spaces in RBKC (eg. in employment zones in the north of the Borough), these spaces are now predominantly used as studios and offices by the creative industries, rather than the strict definition of B1c uses. The</p>	<p>units to meet the specific demands of the Borough's office sector'. We consider this would have a negative impact on the office market, as the types of units provided should be driven by the market to meet local needs arising. This approach would be contrary to NPPF Paragraph 22 which supports applications for alternative uses of land/buildings to be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</p>	<p>The Council does not resist all business land uses swaps per se. However, swaps will be resisted where the overall diversity of the business floor space offer would be harmed. This could be both in terms of location as well as quantum. The Council is of the view that South Kensington is a suitable office location.</p> <p>The Local Plan will take a more pragmatic approach and allow changes of use through the B classes. This reflects the practicalities of the Borough's business market and of long established freedom allowed by planning regulations to change from a light industrial use to an office without planning permission.</p>

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			reprovision of 'light industrial' floorspace to office floorspace should therefore be supported within employment zones. Frost Meadowcroft also recommend that an opportunity exists to seek additional office space from conversion of existing warehousing and light industrial premises, as these sites tend to have relatively low levels of existing floorspace relative to site area and have the potential to accommodate larger massed buildings allowing greater floor areas and mixed uses (paragraph 7.1.7). RBKC should consider this more flexible approach to loss of industrial uses within employment zones.		
Tania Martin		Mixed use is very important to keep RBKC vibrant, business should be encouraged as part of new large scale residential developments	Areas should be mixed use – not ghetto-ised	It is important to be flexible rather than prescriptive	<p>The Council supports the principle of mixed use development across the Borough. It also seeks greater flexibility of unit types, with the amended Local Plan being less prescriptive about the nature of business uses which may be appropriate in different locations.</p> <p>This includes support for the introduction of residential uses within the Employment Zones where the employment offer of the property is significantly improved.</p>
N/A (Laura Michaud)	N/A	The council should prioritise the London housing crisis, if business floorspace is sought after, it should be encouraged in areas that have excellent services and transport links	The housing crisis and demand for rapidly escalating property prices is the true issue to the next generation.	The council should be as flexible as possible and allow as many mixed uses as it can. This will help to limit the vast amount of vacant and underused office space we have	<p>Whilst the Council recognises that there is a need to provide housing this should not be at the expense of all other uses. The Council is satisfied that it can meet its housing target and has a five year housing supply. That said, the Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments (outside those allocations for the major strategic sites). This approach may undermine the viability of such proposals.</p> <p>The Local Plan offers flexibility in terms of appropriate locations for new office floorspace. As a “town centre use” the preference will be that it be located in a town centre or other accessible location. However, the Council is also of the view that offices may be appropriate elsewhere, subject to the NPPG and the requirement of a sequential test for all town centre</p>

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					<p>uses. This reflects the fact that nowhere in the Borough is truly "inaccessible".</p> <p>The Council endorses flexibility and recognises that attempting to micromanage business units in particular may prove counterproductive. Flexibility is important if the market it to provide the units in demand at a given time.</p> <p>There is not "a vast amount of vacant and under used office space" in the Borough. The availability rate of less than 2% is significantly under the 8% benchmark set out within the GLA's LOPR (2012) as being necessary to avoid significant upward pressure in rental values.</p>
Kensington Society (Michael Bach)	Kensington Society	3.5/3.7: So far this has only been used in an attempt to retain offices in a redevelopment for housing (205 Holland Park Avenue) The issue of cross-subsidy would end up in competition with affordable housing. There may be cases where the inclusion of offices may be realistic – usually basement and ground floor space that is less attractive for housing. In Employment Zones it may be possible to get both more business floorspace and additional housing as part of an intensification	This does not sound promising – the incentive for relocation let alone to produce more or better space can only be done at the expense of location. Moving office blocks to the Freston Road area has proved difficult as a result of greatly reduced accessibility. This tends to create ghettos of luxury housing rather than mixed-use development.	The Borough already has locational criteria in terms of locating in town centres and areas of high public transport accessibility levels and in "preferred locations", such as preferred office locations. This is covered by existing Policy CF5 and by site allocations	<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p> <p>The Council concurs with the consultee that the introduction of residential uses into an Employment Zone may be appropriate as part of intensification, where it allows a significant uplift in both the quality and the quantity of B class floorspace.</p> <p>The Council does not resist all business land uses swaps per se. However, swaps will be resisted where the overall diversity of the business floor space offer would be harmed. This could be both in terms of location as well as quantum.</p> <p>The proposed Local Plan offers flexibility in terms of appropriate locations for new office floorspace. As a "town centre use" the preference will be that it be located in a town centre or other accessible location. However, the Council is also of the view that offices may be appropriate elsewhere, subject to the NPPG and the requirement of a sequential test for all town centre uses. This reflects the fact that nowhere in the Borough is truly "inaccessible".</p>
Cllr Marshall		We need to be careful not to allow too much 'netting' of office space (assuming we can protect it at all), ie where smaller spaces are lost but replaced with larger floor			The Council endorses flexibility and recognises that attempting to micromanage business units in particular may prove counterproductive. Flexibility is important if the market it to provide the units in demand at a given time. Currently the market is

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		<p>plate offices. For many locals wishing to set up a business in the Borough, it is the shortage of smaller spaces that is the problem. Often those that are available are poor quality. I would be keen our policy ensured that small / self-employed businesses, which are more likely to have a strong local connection, are protected and prioritised over the larger floor plate offices typically favoured by commuting workers who might have limited local connections and contribute relatively less to the vitality of the Borough</p>			<p>providing for new small units as part of larger business centres, and the Council will continue to support such provision.</p> <p>The Council recognises that it can rarely control the amalgamation of smaller business units to the larger. This is not normally development which requires planning permission.</p>
Mr Perryman		<p>While we are all for mixed usage areas, we also recognise the need for more affordable homes. This could reduce the number of homes to create business space in areas where it is not needed or wanted. So flexibility is needed. In some cases, for example, it may be to everyone's advantage for it to work the other way around. We invested significantly in business premises in Latimer Road precisely because of the opportunity for a diversity of uses. Having more people living in the road rather than empty office space would, however, make it feel more loved and less isolated which would in turn be of benefit to our business.</p>	<p>One of the reason an office in the borough attracted us was that they tend not to be like offices elsewhere - that is, surrounded by other offices. This option may result in offices being clustered together in the wrong places.</p>		<p>The Council concurs with the consultee that the introduction of residential uses into an Employment Zone may be appropriate as part of intensification, where it allows a significant uplift in both the quality and the quantity of B class floorspace It can add to the "life" of the area.</p> <p>However, the Council does not concur with the view that there is a significant amount of un-needed empty office floorspace. Vacancy rates are at a historic low level, significantly below the 8% "bench mark" set out within the GLA's LOPR (2012). With availability below the 8% level, the sector is likely to see significant upward pressure on rental levels.</p>
GVA (Tom Edmunds)	Notting Hill Gate KCS Ltd	<p>Q1.1 Option one: The Council should require business floorspace to be provided as part of new large scale residential developments. There should not be a requirement for larger-scale developments to be, as a starting position, mixed use. The supporting text to this option clearly sets out the risks and</p>			<p>The Local Plan will not require the provision of new B class floorspace as part of new large scale residential developments as this approach may undermine the viability of such proposals. In addition such an approach would be likely to have a significant impact on the Borough's ability to meet its housing targets.</p>

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		<p>disadvantages to such an approach, whereby the planning system should not place demands on development to render it unviable. There may be some circumstances where business uses are not appropriate alongside large residential developments.</p> <p>It is not clear how this policy would be drafted, and how the council "could choose" the level of commercial floorspace that would be required relative to the residential floorspace being provided. Viability, deliverability, and the wider policy objectives of the Development Plan have the potential to be adversely affected by placing unnecessary burdens on development.</p> <p>This impact on viability is not limited simply to a reduction in like-for-like residential floorspace, but the viability of a scheme will be further compounded by site constraints and practical limitations of a site, having regard to the need to create high quality mixed use development. The interaction between commercial and residential uses will necessitate additional entrances, additional cores, and a development that is inefficient in its use of the site.</p> <p>Such a policy approach would also have an impact on other benefits being brought forward by any given residential scheme, such as (for example) S106 contributions, public open space, community uses, and affordable housing. There is a risk that too many competing demands are</p>			

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		being asked of residential development, which in turn would risk stymieing development in the Borough, frustrating the deliverability of the wider policy objectives and vision of the Core Strategy.			