

Local Plan Partial Review Issues and Options Consultation Schedule



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

November 2014 Enterprise Issues and Options

Question 2: What planning policies should be adopted which will protect the premises used by the business sector and improve the nature of the premises available?

(Questions 2.1 to 2.5)

Name	Company / Organisation Name	Q2.1 Option One: flexible approach to changes of use between the B class uses.	Q2.2 Option two: protect warehousing within the Borough.	Q2.3 Option three: support a loss of business floorspace on a site where that which remains is of a better quality, or of a nature better suited to the local market.	2.4 Option four: The Council should promote the creation of new districts If so, where would they be most appropriate and what policies could enable them?	Q2.5 Option five: resist the replacement of floorspace in basements.	Comments
Mizzi	Latimer studios	Yes, the council should take a flexible approach to classes A to D	Warehousing doesn't seem relevant in the Borough	Case by case basis	Keen to attract innovative creative and growing businesses, but this should be a general policy – business rate's cut/tax breaks would help, but not keen on districts – this should be organic	It is important to keep ground floor business units rather than replace in basements	<p>The Local Plan will 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. In reality, relatively few "true" light industrial units remain, with many former B1(c) uses now used as hybrid uses, with differing parts of the premises used for design, for sales and for manufacture. The emphasis within the draft Local Plan is in protecting B class business uses in the round rather than any specific B class uses. All B class uses have value.</p> <p>The exception will be when the B1(c) use in question is a car repair garage. Such a use has a particular function, akin to a social and community function, and where possible the loss of such a use will be resisted, even where this change of use is to an alternative B class uses. The Council does recognise that such changes of use would not ordinarily be a form of development which would require planning permission.</p> <p>The consultees views on the benefits of warehousing are noted. The amended Local Plan does not seek to protect B8 uses when being lost to an alternative B class business use. It does, however, afford protection to higher value uses such as residential.</p>

							<p>The Council intends to promote the existing Employment Zones as centres for “innovation”.</p> <p>The Council concurs with the consultee’s view that the relocation of existing business floorspace into basements may not be appropriate and should generally be resisted. Basement offices are generally less desirable than offices which benefit from natural light. Such a move may result in a degradation of the Borough’s stock of office accommodation.</p>
Town Planning Services (Chris Green)	Town Planning Services	<p>The presumption in favour of sustainable development requires that development plans be sufficiently flexible to adapt to rapid change, unless the impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.</p> <p>In our view, it may be appropriate to consider the scope for greater flexibility between the various employment uses.</p>	No comment	In the absence of any greater flexibility (discussed below), we would agree that this approach might have merit. Overall however, the Council’s existing policies remain unduly onerous and fail to reflect the presumption in favour of sustainable development.	No comment	No comment	<p>The Local Plan will 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. In reality, relatively few “true” light industrial units remain, with many former B1(c) uses now used as hybrid uses, with differing parts of the premises used for design, for sales and for manufacture. The emphasis within the draft Local Plan is in protecting B class business uses in the round rather than any specific B class uses. All B class uses have value.</p> <p>The exception will be when the B1(c) use in question is a car repair garage. Such a use has a particular function, akin to a social and community function, and where possible the loss of such a use will be resisted, even where this change of use is to an alternative B class uses. The Council does recognise that such changes of use would not ordinarily be a form of development which would require planning permission.</p>
Earl’s Court Society (Malcolm Spalding)	Earl’s Court Society	Yes on a case by case basis			Protect and enhance existing.		<p>Noted. The Local Plan supports changes of use within the B classes. Ordinarily such changes of uses do not require planning permission. The Council does however particularly value car repair garages, a B class use which can be akin to a social and community use.</p> <p>The Council intends to promote the existing Employment Zones as centres for “innovation”.</p>
K&C CHAMBER of COMMERCE (SPALDING)	K&C CHAMBER of COMMERCE	Q2.1 Option One: The Council should take a flexible approach and allow changes of use between the B class uses.					<p>Noted. The Local Plan supports changes of use within the B classes. Ordinarily such changes of uses do not require planning permission. The Council does however particularly value car repair garages, a B class use which can be akin to a social and community use.</p>

		Yes, Whilst protecting B1 Space					
Jo Sherrard		No comments					Noted.
Wentworth Andersen (Mr Biggin)	Wentworth Andersen	The Council should take a flexible approach and allow changes of use between the B class uses.	Warehousing seems unlikely to survive market pressures. It adds little in employment or local benefit and is currently misused	No.	There are few opportunities within the borough that are not already defined. Best adjust the controls on the existing designations	- Dependent on quality of existing and quality of proposed. - basement level provision can be of excellent quality.	<p>Noted. The Local Plan supports changes of use within the B classes. Ordinarily such changes of uses do not require planning permission. The Council does however particularly value car repair garages, a B class use which can be akin to a social and community use.</p> <p>The consultee's views on the benefits of warehousing are noted. The amended Local Plan does not seek to protect B8 uses when being lost to an alternative B class business use. It does, however, afford protection to a higher value uses such as residential.</p> <p>The Council seeks to protect B class uses across the Borough, although does recognise there may be some circumstances where a small element could be lost if it helps enable the ongoing future of what remains.</p> <p>The Council intends to promote the existing Employment Zones as centres for "innovation"</p> <p>Basement offices are generally less desirable than offices which benefit from natural light. Such reconfiguration of space may result in a degradation of the Borough's stock of office accommodation, and as such be resisted. The Council will, however, treat any application on its merits and make an assessment as to the quality of any replacement floorspace. It notes that basement floorspace with adequate daylight can be of a high quality.</p>
Gerald Eve LLP (Neil Henderson)	Gerald Eve LLP (Cadagon Estate)	The Estate considers it sensible to allow for a flexible approach to the change of use between the different B Use Classes but to ensure that there is a policy basis that will be sufficiently robust to resist such changes of use where they are likely to have an unacceptable impact upon the amenity of neighbouring properties	The Estate understands the Councils concerns that there appears to be a loophole allowing the change of use from B1 to B8 without the need for planning permission and thereafter achieve planning permission for a change of use to residential (as	Although the Estate supports the retention of employment floorspace generally, there are clearly circumstances where its loss may be justified. The supporting text within the Consultation Document to this option correctly states that, "for an owner of a commercial property to spend the money necessary to refurbish the property to a modern standard	The Estate has no experience of the creative industry sector and therefore is not qualified to comment on this matter	The Estate would support a policy basis which seeks to require the replacement of business floorspace to be of an equal quality to that which is being replaced. Where the quality of the floorspace being replaced is better than the existing accommodation, it may be appropriate for there to be reasonable flexibility on the precise	<p>Noted. The Local Plan supports changes of use within the B classes. Ordinarily such changes of uses do not require planning permission. The Council does however particularly value car repair garages, a B class use which can be akin to a social and community use.</p> <p>Whilst existing Policy CF5 does allow the Council to protect B8 uses, the Council recognises that the position is not as explicit as it could be. The amended Policy CF5 will specifically refer to warehouse uses. Loss will only be permitted when to an alternative B class use, and not when a change to residential is sought. This will ensure that the overall stock of B class uses is not eroded.</p> <p>Viability is, and will continue to be, capable of being a material consideration when considering any</p>

			<p>there is no policy that resists the loss of B8 Uses). The Estate is keen to ensure that employment floorspace is not lost through divisive measures which avoid the rigour of planning consideration. As a result, the Estate would support measures which would allow the Council to control the loss of warehousing (Use Class B8) to residential and allow the merits of each case to be considered carefully.</p>	<p>suitable for the tenant market, the return on capital employed must be such that it is worthwhile."</p> <p>The Estate therefore considers it is highly relevant for "viability" to be a material consideration in the determination of any application where an element of employment floorspace is lost in order to "enable" the delivery of better quality employment accommodation. See also response to Q 1.1 Option 1.</p> <p>The Estate would also support a policy approach which sought to acknowledge the balance of other planning benefits being brought forward by a scheme which might outweigh any relative harm caused through the loss of employment floorspace. See also response to Q 2.8 Option 8</p>		<p>quantum of floorspace re-provided i.e. a reduced quantum.</p>	<p>proposals which include the provision/ retention of B class floorspace. The Council commissioned Frost Meadowcroft to consider viability on a Borough-wide basis and this concluded that the entire Borough was a "viable" office location and that the returns associated with a refurbishment are more than enough to make the refurbishment worthwhile. However, the Council recognises that such a Borough-wide study is relatively coarsely grained. The circumstances/ conditions of a particular property would be assessed when considering an application.</p> <p>The Local Plan seeks to ensure that the quality of the Borough's office floorspace is not eroded through reconfiguration and relocations into unlit basements and other poorer quality locations.</p>
<p>St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)</p>	<p>St Quintin and Woodlands Neighbourhood Forum</p>	<p>General comment on Qu 2. The Royal Borough is not an island</p> <p>2.1 A second flaw in the Issues and Options paper is the lack of attention paid to what is happening in the employment markets beyond the borough boundaries. In particular, no mention is made of proposals for the</p>					<p>The Council recognises that there is significant business development expected outside the Borough's boundaries. However, this development is unlikely to have a detrimental impact upon the demand of office space in this Borough. Indeed the triangulated projection model uses to inform the LOPR suggests that office development creates its own need. It is entirely possible that the office campus at Imperial West, a development which only lies a few metres from the Latimer/ Freston Road Employment Zone, may increase office need over the long term. The Council will keep this under review and have regard to ongoing office need projections.</p>

		Opportunity Areas to the west in Hammersmith and Fulham, where an unprecedented increase in office space is planned for White City East and Old Oak. Parts of this (as at Imperial West) are already approved and under construction. Plans for 55,000 new jobs at Old Oak (London Plan Further Alterations 2014) are at an earlier stage. Updated RBKC policies for enterprise in the north of the Borough need to be developed in this wider context.					In essence, the key question for the Local Plan is whether Latimer /Freston Road is currently a suitable office location. If the Council takes the view that it is – this leads to policies which seek to maintain business uses in this location and supports this area for additional growth. This was explicitly considered at the examination into the StQW NP where the inspector was of the view that Latimer/Freston Road is a viable office location.
Golborne Forum (Susie Parsons)	Golborne Forum	No comment					Noted.
Woofie Ltd (Tanya Sarne)	Woofie Ltd	The Council should take a flexible approach and allow changes of use between the B class uses. YES	No. Warehousing uses up valuable space	YES	I don't believe this is appropriate in Latimer Rd. There is some scope for development in FRESTON RD. However new districts may not be necessary as the borough has many varied districts and new ones may not be appropriate.	NO	The Local Plan will allow changes of use through the B classes. This reflects the practicalities of the Borough's business market and of long established freedoms allowed by planning regulations to change from a light industrial use to an office without planning permission. In reality, relatively few "true" light industrial units remain, with many former B1(c) uses now used as hybrid uses, with differing parts of the premises used for design, for sales and for manufacture. The emphasis within the draft Local Plan is in protecting B class business uses in the round rather than any specific B class uses. All B class uses have value. The exception will be when the B1(c) use in question is a car repair garage. Such a use has a particular function, akin to a social and community function, and where possible the loss of such a use will be resisted, even were this change of use is to an alternative B class uses. The Council does recognise that such changes of use would not ordinarily be a form of development which would require planning permission. The Council intends to promote the existing Employment Zones as centres for "innovation"

N/A (Chadi Semaan)	N/A	The council should allow all changes to suit demand, including residential and/ or all commercial use classes. Anything is better than vacant and underused space	I don't think RBKC is suitable for warehousing space anywhere	Unsure	Flexibility would allow a natural scope for change	think basement areas can be used efficiently and provide valuable space to support the floorspace above both in residential and commercial premises	<p>Whilst the Local Plan does allow changes of use within the B classes, it does not endorse the loss to residential uses. This reflects the value that B class uses have upon the local and the wider economy. It also reflects the low level of vacancy rates in the Borough's office market – a level which strongly suggests that the Council is only protecting land when there is a realistic prospect of that land continuing to be used as such in the future.</p> <p>The Council is of the view that warehousing can have some value in its own right. However, the Council also recognises that use as an alternative B class use may also be appropriate. As such the proposed Local Plan allows the loss of B8 uses to other B class uses but not the loss to residential.</p> <p>The Local Plan seeks to ensure that the quality of the Borough's office floorspace is not eroded through reconfiguration and relocations into unlit basements and other poorer quality locations. However, any proposal will be considered on its merits and the Council does recognise that well designed basement floorspace, with good natural light, can prove a useful function.</p>
Clobb Properties Ltd (Richard Ehrman)	Clobb Properties Ltd	Such flexibility is already largely permitted by national rules. More flexibility between B classes and A and D classes would help.	No. The borough is not well suited to being a warehousing location.	Yes, this makes senses.	No. Businesses clusters have to be organic to work. Attempts to micromanage them are likely to be self defeating.	This should be considered on a case by case basis. Basements are not always sub optimal	<p>The Local Plan will 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 Local Plan does allow some changes of use from B class to A1 uses within town centres. However, a free for all for changes of use to the A classes will not be appropriate. It may result in the loss of valued B class uses, see the degradation of the function of the Employment Zones and may run counter to the retail policies within the NPPF. The unplanned expansion of A class uses could have a detrimental impact upon the vitality of existing town centres. Individual cases can be considered on their merits.</p> <p>The same can be said for changes of use from B to D class uses. Such a use may be appropriate, but a specific policy allowing such a use may have undesired consequences. Suitability will depend of the nature of the B class use and of the proposed D class use.</p> <p>The Council is of the view that warehousing can have some value in its own right. However, the Council also recognises that use as alternative B class uses may also be appropriate. As such the</p>

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Kerry Davis-Head		<p>Not necessarily. Any charge to industrial use for example would be unwelcome in a residential area 2 yes if it prevents conversion to residential or vast increases of office workers to an area, thereby increasing congestion 3. I'm not sure of the wording</p>			<p>Lots road employment zone should be renamed/rebranded to bring it up to date. Artisan and small scale usage should be encouraged</p>	<p>basements could free up space if they were strictly controlled for storage use only. Or for car parking/bike on new developments</p>	<p>The Council recognises that given the differential in and values changes of use from B1 to B2 are extremely unlikely in this Borough. Any such application would be assessed using the suite of policies within the Local Plan – including those concerning the amenity of a local area.</p> <p>A change of use from a B1(a) office – to a B1(c) light industrial uses would not, ordinarily require planning permission. The Council notes that the definition of light industrial uses is an industrial use which is “neighbourly”.</p> <p>The Local Plan supports the Employment Zones as locations for smaller business uses. It does not however, intend to be prescriptive and will allow larger floorplate offices if these met the requirements of the sequential test. The Council notes that the market is providing smaller office units within larger “created” office spaces.</p> <p>The Council recognises the value that basements can have in ancillary business uses, uses such as bike storage, meeting rooms or for services. The Local Plan does, however, note that such reconfiguration does have the potential to degrade the quality of the Borough's office floorspace.</p>
Cremerne Residents' Association of Lots Village (Davis-Head)	Cremerne Residents' Association of Lots Village	<p>LREZ does not have many warehousing /light industrial units, there seems no need for the Council to take a flexible approach and allow changes of use between B class uses in this zone, any proposed changes should go through the normal process that is required for domestic changes, with full consultation.</p> <p>There should</p>	<p>In so far as the auction houses in Lots Road may be deemed to be warehousing, the Council should seek to protect any other business space in the zone from conversion B1 businesses to such B8 use. The council should seek to amend the Core Strategy to put in place an</p>	<p>In view of the loss of business space across inner London and yet the continued growth in the working age population the Council should not allow the loss of any more floor space even when the loss is to social or community uses. it is only high end residential developments and not new office space provision which can</p>	<p>Although LREZ is already a notable cluster it needs further promotion and enhancement. New business clusters elsewhere in the borough should ideally be self contained and not "mixed in" with residential and leisure uses, it is hard to recreate the natural evolution of the Lots Village mix in a brand new development With a few exceptions, Lots</p>	<p>We agree that the replacement of existing business floor space with "suboptimal" floor space is not usually appropriate. But if lower ground areas can supplement commercial space and prevent higher level development it could be welcome. So often office windows reveal clutter and overflowing storage,</p>	<p>Changes of use within the B1 uses (and to and from B8 uses) do not, ordinarily, require planning permission. Where planning permission is required, the Council does support flexibility – as long as there is no loss to residential. The public will be consulted on any such application in the normal way.</p> <p>The Council concurs with the consultee's view that the presumption against the loss of B class floorspace should remain. This reflects the value that such uses have to the local and wider economy.</p> <p>The Local Plan has been amended to protect warehousing unless to an alternative B class use. The value of the Borough's auction houses has</p>

		certainly remain a presumption against the loss of any B1 floorspace, although the economic health and requirements of the existing interior design cluster should be regularly monitored, so that investment in the refurbishment of existing floor space can be stimulated and the creative hub maintained.	explicit policy to resist the change of use from B8 warehousing to residential	begin to generate worthwhile community gains, although the Council itself could use existing land holdings to improve the public realm and/or local infra structure. For example, in Lots Village the car pound could be used to supplement sports facilities (in door) for the Chelsea Academy and the local community. But measures need to be put in place always to ensure the use is for the local community who can walk there and not to encourage facilities where people drive in from other boroughs etc	Village is the design hub of Chelsea, other types of hubs could be created elsewhere in the borough but not in Lots Village	if basements can be used to free up above ground space then one level down might be appropriate. Although seemingly unpopular with offices, ground floor units are preferable for residents as higher level units may compromise privacy in facing bedrooms.	been reflected by including these within the definition of an Arts and Cultural use. The Local Plan supports the growth and enhancement of the existing Employment Zones, Lots Road included. The Council recognises the value that basements can have in ancillary business uses, uses such as bike storage, meeting rooms or for services. The Local Plan does, however, note that such reconfiguration does have the potential to degrade the quality of the Borough's office floorspace.
333 Latimer road (Corrett)	333 Latimer Road	This is already allowed.	No comment	This could help the problems of Latimer Road	The Council might not get it right, see Q1.3.	No comment	The Council notes that movement within the B1 (and the B8) classes does not normally require planning permission. However, the Local Plan has been amended to reflect this flexibility, which explicitly resisting the loss of any B class use to residential. The Council intends to promote the existing Employment Zones as centres for "innovation".
DP9 LTD (Hannah Willcock)	DP9 LTD (for BH NHS)	We welcome the opportunity for a more flexible approach between the B class uses as outlined in Option one, however this is unlikely to be particularly relevant to our development proposals. The Core Strategy looks ahead to 2028 and in the lifetime of this plan the extent and demand of different employment industries could change significantly	This option is not relevant to the Chelsea Masterplan development proposals and we have no comments	Option three states that "the Council should support a loss of business floorspace on a site where that which remains is of a better quality, or of a nature better suited to the local market." In the Frost Meadowcroft report, 41 properties have been considered across the borough, all of which are in varying sizes and types to provide an overview of general viability of	This option is not relevant to the Chelsea Masterplan development proposals and we have no comments.	This option is not relevant to the Chelsea Masterplan development proposals and we have no comments.	Support for flexibility between the B class uses noted. The Council recognises that there may be circumstances where the loss of some B class floorspace may be appropriate where this allows the long term future of that which remains. Such a situation will be considered as part of the merit of a particular case rather than within a specific policy. A specific policy may have the undesired affect as of encouraging the loss of business floorspace.

		<p>and therefore taking a flexible approach seems the most appropriate.</p>		<p>offices in their continued use. This report (paragraph 6.1.5) supports the approach taken in option one as it recognises that 'if the viability of redeveloping or refurbishing office space proceed to be uneconomical, the strong residential values may allow for the opportunity to introduce mixed use schemes to enable the development's viability and provide a sufficient level of profit to support the improvement and viability of existing office space in mixed use developments.'</p> <p>We support the approach being taken in Option three. In our experience there is a significant amount of employment :floorspace that fails to meet the needs of the current occupier or general market requirements and could be more efficiently provided in a more efficient floor plate, but still provide the same level of jobs and cater for the same needs. These areas of underutilised space can be used more effectively for other non-business uses. In some instances the perceived negative that is attributed to the loss of employment :floorspace can be</p>			
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				outweighed by the better quality accommodation created, particularly where other parts of the accommodation could benefit from investment.			
DP9 Ltd (Rachel Crick)	DP9 Ltd For SA 60 Ltd	<p>This approach provides significant benefits by encouraging flexibility between B class uses which would enable planning policy to keep up with market demand in relation to the changing employment sectors in the borough, for example the extent of the creative industries in employment zones, where a flexible approach to B class uses would have a positive impact on encouraging a variety of employment uses within Employment Zones.</p> <p>3.10 It is interesting that PBA note that traditional industrial and warehouse industries is mostly absent in employment zones, although it notes that there are a few exceptions such as Travis Perkins at Freston Road and the Laundry Site at Kensal Road (paragraph 3.16). This is inaccurate as the Laundry Site is currently vacant, and the Council has accepted the loss of the former laundry facility through the consent of an</p>	<p>Option Two states that 'the Council should seek to protect warehousing within the Borough'. We object to this proposed policy as it has been demonstrated in the PBA report that industrial warehousing in RBKC is mainly occupied by studios and creative industries, and therefore the market for more traditional warehouse units appears to be diminishing. This is reflected in the limited GLA forecasts for industrial land demand (paragraph 2.13). Although the GLA in the Land for Industry and Transport SPG identify that RBKC should be a 'restricted transfer' borough in relation to industrial land, we note that the GLA advise that 'this should not preclude the possibility of smaller scale</p>	<p>Option Three 'the Council should support a loss of business floorspace on a site where that which remains is of a better quality, or of a nature better suited to the local market'. This approach is supported by the Frost Meadowcroft Report which includes a viability assessment for the continued use of 41 office buildings in the borough (assessment of the investment required to keep the building in its existing use). Frost Meadowcroft acknowledge that 'if the viability of redeveloping and refurbishing existing office space is proved to be uneconomical, the strong residential values may allow for the opportunity to introduce mixed use schemes to enable the development's viability and provide a sufficient level of profit to support the improvement and viability of existing office space in mixed use developments' (paragraph 6.1.5).</p> <p>3.15 The Frost Meadowcroft viability assessment uses an</p>	<p>Option Four 'the Council should promote the creation of new districts – to attract innovative, creative and growing businesses. If so, where would they be most appropriate and what policies could enable them'. We consider that the Council should promote new mixed use areas or districts for enterprise within the north of the Borough, which would accord with the overarching principles of the Core Strategy. Within such districts a more flexible approach towards employment uses, and supporting uses (such as retail, leisure and residential) should be supported in order to create exciting environments to work and live. This would seek to address concerns of existing businesses identified in the PBA report that areas such as Kensal and Freston Road about the general environment in these areas (including a lack of local amenities and lunch spots, safety and security during the evenings, burglary and general unattractiveness).</p> <p>3.19 The PBA business survey also identifies that the only 26% of</p>	<p>Option Five states that 'the Council should normally resist the replacement of floorspace in basements and other sub-optimal areas'. Our client strongly objects to this policy proposal, as it would not meet the needs of the market. We consider that there are a number of examples where basement office accommodation can provide useful space. For example, in schemes where basement employment space is provided as part of a larger office scheme, such spaces can be imaginatively designed to maximise space and provide storage solutions, accommodate IT equipment and server rooms, or meeting rooms. We therefore object to this proposed policy, as it would be overly restrictive to office occupiers.</p>	<p>The Local Plan supports greater of flexibility of uses within the B class uses, whilst protecting the loss of a B class use to residential.</p> <p>The Council recognises the changing character of the Employment Zones, and that the reduction in the emphasis as a source of employment for local people. The protection within the B class uses rather than resisting changes within it reflects this position.</p> <p>The Council supports the consultee's position that it is appropriate to allow the release of warehousing land to offices. The loss of warehousing to residential uses will however be explicitly resisted within the Local Plan.</p> <p>The Council recognises that there may be circumstances where it may be appropriate to see the loss of some B class floorspace where this helps ensure the long term future of that which remains and improves its quality/suitability. This can be considered as and when an application is submitted. The Council is concerned that a specific policy may have unintended consequences and undermine the over-arching ambition to maintain a diversity of business uses and to maintain the stock of such uses.</p> <p>The Council recognises the value that basements can have in ancillary business uses, uses such as bike storage, meeting rooms or for services. This will particularly be the case in larger office buildings. The Local Plan does, however, note that such reconfiguration does have the potential to degrade the quality of the Borough's office floorspace. The nature of the basement floorspace being provided is important when determining the appropriateness of an application.</p>

		<p>application for the mixed use redevelopment of the site for office and student housing (application reference PP/13/06196). The site was recently sold to facilitate its development.</p> <p>3.11 PBA conclude that the qualitative rationale for originally safeguarding employment zones 'was partly that they provided jobs for residents of local disadvantaged communities. We suspect this is no longer the case, because there are few employers of non-specialist workers remaining in the zones. However the creative industries that have replaced them are likely to employ more highly qualified works, sourced from a wide catchment area and fostering these jobs are a GLA priority' (paragraph 5.5).</p> <p>3.12 This demonstrates that the Borough's employment zones no longer provide distinctive light industrial uses, and there is clear demand in these locations for more flexible office space for creative industries. This would also accord with the direction of national planning policy which supports flexibility</p>	<p>release where boroughs have made adequate provision for industrial land...in particular for waste management, logistics and SMEs'. We consider that the release of former warehousing building to alternative employment uses, such as offices, studios or creative industries should be supported, and this would not be viable with a protectionist stance to all warehousing in the Borough.</p>	<p>'investment value appraisal', which measures the effects of refurbishment of an existing office to bring it up to modern occupier standards. The report concludes that 'in all the properties assessed, the property benefitted from a net increase in asset value after allowance for associated costs'. However, the assessment fails to take account of situations where further works are required to secure a tenant, for example the requirement to subdivide existing space to appeal to market demand for smaller units.</p> <p>3.16 Frost Meadowcroft do not rule out the potential for mixed use developments to take place where viability of refurbishment is in question, where the proposals would provide replacement commercial space of high quality design (eg. natural light, ceiling heights and restricting basement accommodation) (section 6.6). They conclude that in such instances this would result in office rents rising and an improvement in the quality of the office stock (paragraph 7.1.4).</p> <p>3.17 Overall, we</p>	<p>businesses currently have residential neighbours, and that of those who have neighbours only 25% consider that residents are a problem, whilst the vast majority of those who do not have residential neighbours (90%) did not consider that this would cause problems if allowed. This indicates that existing businesses would be content to mix with residential neighbours. PBA conclude that this reflects the fact that Employment Zones are dominated by office and studio space, which is generally compatible with residential uses.</p>		
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		between B class uses.		consider that in instances where the viability of refurbishment of existing stock is in question, the loss of office floorspace may provide an opportunity to create better quality accommodation either on the site, or on an alternative development site which would benefit from investment. Therefore our client supports this option which seeks to enable the delivery quality employment space which is lettable and meets market demand.			
Tania Martin		Yes, the council should take a flexible approach to classes A to D	Warehousing doesn't seem relevant in the Borough	Case by case basis	Keen to attract innovative creative and growing businesses, but this should be a general policy – business rate's cut/tax breaks would help, but not keen on districts – this should be organic	It is important to keep ground floor business units rather than replace in basements	<p>The Local Plan will 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. In reality, relatively few "true" light industrial units remain, with many former B1(c) uses now used as hybrid uses, with differing parts of the premises used for design, for sales and for manufacture. The emphasise within the draft Local Plan is in protecting B class business uses in the round rather than any specific B class uses. All B class uses have value.</p> <p>The exception will be when the B1(c) use in question is a car repair garage. Such a use has a particular function, akin to a social and community function, and where possible the loss of such a use will be resisted, even were this change of use is to an alternative B class use. The Council does recognise that such changes of use would not ordinarily be a form of development which would require planning permission.</p> <p>The consultee's views on the benefits of warehousing are noted. The amended Local Plan does not seek to protect B8 uses when being lost to an alternative B class business use. It does, however, afford protection from loss to higher value uses such as residential.</p>

							<p>The Council intends to promote the existing Employment Zones as centres for “innovation”</p> <p>The Council concurs with the consultee’s view that the relocation of existing business floorspace into basements may not be appropriate and should generally be resisted. Basement offices are generally less desirable than offices which benefit from natural light. Such a move may result in a degradation of the Borough’s stock of office accommodation.</p>
N/A (Laura Michaud)	N/A	<p>The council should be flexible to all use classes to ensure units are always occupied (rather have a coffee shop or even a betting shop than a derelict office/shop)</p>	<p>Most warehousing has moved out of prime central London, and I think eg. Park Royal would be a better solution to position a business' warehouse if one is required</p>	<p>Broadly agree. If the office space is encouraging life and energy into the area, it is a good thing. It is the rarely used spaces that are uneconomical and bad for the area</p>	<p>A relaxation of permitted uses for mixed use buildings would help this natural progression</p>	<p>Basement floorspace can be a valuable addition to the area, they are not always negative</p>	<p>The Council supports flexibility within and between the B class uses but would not support a policy which allows total freedom. This would result in the loss of a significant amount of the Borough’s B class sector.</p> <p>The Council will always consider a range of material considerations when considering any planning application. Long term vacancy is capable of being one such consideration.</p> <p>The consultee’s views on the benefits of warehousing are noted. The amended Local Plan does not seek to protect B8 uses when being lost to an alternative B class business use. It does, however, afford protection to a higher value uses such as residential.</p> <p>The Local Plan supports the creation of mixed uses (including residential uses) within Employment Zones, where the residential use can support a significant uplift in both the quality and quantity of the business floorspace.</p> <p>The Council recognises that basement floorspace can have value – when well designed and well lit. In many cases this is not the position, and the Local Plan will try to seek to ensure that the quality of the Borough’s office stock is not degraded.</p>
Kensington Society (Michael Bach)	Kensington Society	<p>The key area of flexibility should be in the area of affordable small workspace uses, which could be used flexibly, such as the studio/hybrid space referred to in 3.18.</p> <p>The Society considers that retention of B1 floorspace is essential.</p>	<p>The Society strongly supports this proposal, especially since certain applicants have been trying to use this as an exit strategy from offices to housing to circumvent the policy (eg 19 South End).</p>	<p>The Society does not support this strategy – the market is very tight and there is every prospect that rents will rise sufficiently for the use as offices/business use to remain viable. This approach is unnecessary and should not be specifically encouraged.</p>	No comment	<p>The Society strongly agrees for three reasons:</p> <p>i. it has been used as a mechanism for expunging commercial space (eg the loss of retail space at 4 and 5 Victoria Grove) leaving the above ground space free to become additional housing.</p>	<p>The Local Plan will 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. There is, however, a clear presumption against the loss of B class floorspace overall.</p> <p>Support for explicit protection of B8 uses noted. The Local Plan has been amended to explicitly protect B8 uses unless to an alternative B class use.</p>

		<p>It should be noted that since some applicants have failed to get change of use to housing they have decided to upgrade the property before reletting, for example 10 Ansdell Street – once the hope value of housing disappeared the offices are being upgraded for the new tenant – due to its location. The use as offices is a viable use of the premises.</p>				<p>This has also been attempted in order to expunge office use in mews by putting the offices into a new basement floor, after which the next step will be to seek change of use to housing because the basement space cannot be let.</p> <p>ii. the Lancer Square application is the ultimate abuse of this wheeze, where the amount of offices is "retained" by relegating most of the floorspace underground in a deep floor plan with only skylights for natural lighting the office floorspace – this expunges above ground offices with the basement offices having poor working conditions.</p> <p>iii. consents have been granted for changes in mews buildings where the office content is relegated to unsuitable basement areas and then surprise surprise does not let. RBKC need to find a way to stop this. They need to take account of the suitability of any space to the use described.</p> <p>The Society supports the</p>	<p>Whilst the Council supports the retention of all B class uses it does recognise that there may be circumstances that a modest loss can help support the long term future of that which remains. The Council does, however, concur with the consultee's view that a specific policy supporting such an approach may be counterproductive and have unintended consequences.</p> <p>The Council concurs with the consultee's view that the relocation of existing business floorspace into basements may not be appropriate and should generally be resisted. Basement offices are generally less desirable than offices which benefit from natural light. Such a move may result in a degradation of the Borough's stock of office accommodation.</p>
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						rejection of this option (and objects to the word "normally" in any policy!)	
Tate				Yes			Noted
Mr Perryman			Warehouse spaces generally have the greatest potential for creative businesses. While often not in the best locations, significant investment from such companies can help lift these areas, not to mention provide employment. It would be a shame to limit this opportunity for improvement.	Agree. It is important to retain the flexibility to be able to do what is best for a particular site.	The most innovative businesses create things themselves! They don't necessarily want to be surrounded by similar companies - there is often more inspiration in diversity. If hubs do develop organically, they are likely to be more appealing.	This seems unnecessarily restrictive? For example, the workplace is increasingly recognised as an appropriate setting for promoting physical activity, and basements are great places for gyms	<p>The Council supports the consultee's position that it is appropriate to allow the release of warehousing land to offices. The Council recognises that former warehousing buildings may be well suited for businesses operating within the creative sector. The loss of warehousing to residential uses will however be explicitly resisted within the Local Plan.</p> <p>The Council recognises that there may be circumstances where it may be appropriate to see the loss of some B class floorspace where this helps ensure the long term future of that which remains and improves its quality/suitability. This can be considered as and when an application is submitted. The Council is concerned that a specific policy may have unintended consequences and undermine the overarching ambition to maintain a diversity of business uses and to maintain the stock of such uses.</p> <p>The Council intends to promote the existing Employment Zones as centres for "innovation". This organic growth is likely to be more successful than any attempt to create new innovation districts from scratch.</p> <p>The Council recognises that commercial basements can have value. They can provide ancillary space for larger offices, or as the consultee suggests, suitable locations for gyms. However, it should be noted that a gym is a class D1 use rather than an office. This element is concerned with the relocation of B1 uses.</p>
Jane Heffron		Q2.1 Not necessarily. If a business is in a residential area, residents should be allowed some control over what types of businesses can operate there – this is for many reasons from child safety to issues of noise, rubbish, appearance.					The Council recognises that not all industrial uses will be appropriate in all areas. Whilst the differential in land value would suggest that the creation of any new B2 (general industrial uses) would be extremely unlikely, any applications that do occur would be assessed against the range of policies within the Local Plan. This includes policies which consider the amenity of the local areas, appearance, waste and the like. It should be noted that, by its very definition within the use classes order, a B1(c) light industrial use is "neighbourly", although the details of the actual proposal will be important when considering its suitability.

GVA (Tom Edmunds)	Notting Hill Gate KCS Ltd			<p>The government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. The National Planning Policy Framework states that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'.</p> <p>There is a clear emphasis in Government planning policy to assist the delivery of development and ensure that it is not unnecessarily restricted. We support policies that are flexible and allow for the change of use from employment uses in appropriate circumstances and having regard to local context, including the suitability of the existing building for continued business use, market demand and whether alternative uses may be preferable to deliver other strategic priorities and wider planning objectives.</p> <p>We support the trade off on use in return for the provision of up to date office provision fit for current market needs. There will be</p>			<p>The Council recognises that there may be circumstances where it may be appropriate to see the loss of some B class floorspace where this helps ensure the long term future of that which remains and improves its quality/suitability. This can be considered as and when an application is submitted. The Council is concerned that a specific policy may have unintended consequences and undermine the overarching ambition to maintain a diversity of business uses and to maintain the stock of such uses.</p>
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			<p>instances in the Borough where existing physical conditions are harming the ability for the Borough to serve modern business needs.</p> <p>It would promote the re-provision of high quality, modern and fit for purpose business floorspace that would encourage businesses to locate or retain their interest in the Borough's town centers.</p> <p>This approach would also facilitate the delivery of planning or community benefits, for example new public open space or community uses (see response to Q2.6 below).</p> <p>There is clear national guidance in relation to avoiding the unnecessary long term protection of employment sites. The market for employment sites is driven by many factors including the quality of the floorspace that is offered. There are instances where it is not viable or desirable to re-provide updated employment space in a town centre location on the basis of viability and site specific constraints. In these instances and in connection with the responses</p>			
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				above, the Borough should include flexibility where there would be a loss of employment floorspace.			
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