

Local Plan Partial Review Issues and Options Consultation Schedule

November 2014 Enterprise Issues and Options



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

Question 3: What, if any, spatial policies should the Council adopt in respect of business use?

Name	Company / Organisation Name	Q3.1 Option one: The Council should take a different approach for business uses within town centres than elsewhere.	Q3.2 Option two: The Council should take a different approach to the protection of business floorspace in Earl's Court than that taken elsewhere in the Borough.	Q3.3 Option three: The Council should continue take a different approach to development within the Employment Zones than elsewhere in the Borough.	Q3.4 Option four: Should the Council develop policies tailored to the character of each Employment Zone?	Comment
Town Planning Services (Chris Green)	Town Planning Services	No comment.	No comment.	<p>The NPPF is clear that offices are 'main town centres uses'. New office development should therefore be directed to town centre locations in accordance with the sequential approach.</p> <p>In this context, it should be recognised that existing offices outside existing town centres and in less accessible locations (including those in some Employment Zones), do not accord with the 'town centres first' principle. Accordingly, some existing office buildings may more sustainably be used for residential purposes.</p>	<p>The consultation document accepts that each Employment Zone is different. We would concur with this assessment: there is significant variation in the nature of each and their potential to accommodate change. Moreover, we would suggest that in some cases, there is significant variation within individual Employment Zones.</p> <p>In particular, the development plan treats Latimer Road and Freston Road as a combined area. However, there is a marked difference in these areas. While Freston Road accommodates a number of high profile occupants, this does not translate to Latimer Road. The Westway physically separates the two areas, and Latimer Road is considerably less accessible. It is more remote from other office locations, as well as the services and facilities demanded by tenants. Accordingly, any more finely grained analysis would demonstrate that the occupancy levels and vacancy rates in Latimer Road are quite different. Equally, the rental levels achieved in this area are considerably lower.</p> <p>It is accepted in the consultation document that this area requires further investment if viability is to be ensured (Paragraph 2.26). It is later acknowledged that there are "small</p>	<p>The Council recognises the value of its remaining stock, wherever it may be. As such the loss of offices in less accessible locations will not be supported. Whilst the NPPF does confirm the town centre first approach for new town centre uses (offices included) there is no suggestion that such uses should be lost when not within a town centre. The test is that uses should only be protected when there is a "reasonable prospect" of that unit being used for the allocated use. The Council is satisfied that this is the case across the Borough.</p> <p>The Council has carried out a review of the viability of Latimer Road as an office location to help inform the StQWNP. The inspector at the examination of the StQWNP concurred with the findings of this report – and that Latimer was a viable office location.</p> <p>The individual circumstances of an individual unit will be considered as and when a planning application is made.</p>

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					<p>pockets of the Borough where the market is less robust or where encouragement is needed if further refurbishment is to come forward" and we would suggest that Latimer Road is one such area.</p> <p>In accordance with the NPPF, the Council should regularly review the land allocations, and we consider that the existing Employment Zones should be examined. For the reasons above, we consider that Latimer Road should be excluded from the Employment Zone, or as a minimum, treated entirely separated from Freston Road.</p>	
Earl's Court Society (Malcolm Spalding)	Earl's Court Society	Protect & Enhance offices & Business in Town Centres	No- Protect Enhance Existing EC Business	Yes	Yes	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council concurs with the view that offices in the Earl's Court area should be protected. This approach is supported by the Council's viability report which confirms that there is no reason to suggest that offices in Earl's Court are inherently unviable. The individual circumstances of an individual unit will be considered as and when a planning application is made. This consideration will include the nature of the office market in Earl's Court at the time of the application.</p> <p>The Council concurs with the view that it should continue to take a different approach for development within</p>

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						<p>Employment Zones than that elsewhere in the Borough. This reflects the important function that the Employment Zones have in providing the Borough's stock of business uses and for the local and wider economy. Development within the Employment Zone must be business lead. This is not the case elsewhere within the Borough.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p>
K&C CHAMBER of COMMERCE (SPALDING)	K&C CHAMBER of COMMERCE	Protect all town centre business uses.	No- Protect Enhance Existing EC Business	Agreed Protect Business Uses in Employment zones.	Agreed	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council concurs with the view that offices in the Earl's Court area should be protected. This approach is supported by the Council's viability report which confirms that there is no reason to suggest that offices in Earl's Court are inherently unviable. The individual circumstances of an individual unit will be considered as and when a planning application is made. This consideration will include the nature of the office market in Earl's Court at the time of the application.</p>

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Jo Sherrard				Yes	<p>Having looked at the reports contained in the Enterprise Review, I would like to make some comments on the parts that affect my own neighbourhood which is the Lots Road area - one of the three areas of employment in the Borough. As mentioned in the reports the potential for new industrial space here is restricted by physical constraints (railway, river and 2 major roads) and I welcome this comment as the infrastructure here is not capable of supporting major expansion in office/business accommodation as well as the residential development that is already taking place. I also agree that new development of this nature would NOT be attractive to the Lots Road core market. This area attracts small businesses and spaces such as those provided by Worlds End Studios appear to be what is popular.</p> <p>The current mix of residential and commercial, with its plentiful number of small businesses and office accommodation, is welcome but the</p>	<p>The Council concurs with the view that it should continue to take a different approach for development within Employment Zones than that elsewhere in the Borough. This reflects the important function that the Employment Zones have in providing the Borough's stock of business uses and for the local and wider economy. Development within the Employment Zone must be business lead. This is not the case elsewhere within the Borough.</p> <p>The Council is not in a position to change the designation of the Cremorne Wharf as a safeguarded wharf. This is not proposed within the Local Plan.</p> <p>The Council notes the view that the Lots Road Employment Zone is not suitable for significant new development. Whilst the Council does not object to the principle of new development, any such development must have regard to townscape and the amenity of those living in the vicinity.</p>

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					<p>infrastructure is not robust enough to cope with an increase. I note a couple of discrepancies in the reports where, in one section it states there will be no office space in the redeveloped Lots Road Power Station (LRPS) but in another we are told that there will be spaces for offices and small businesses – I believe this second statement is the more accurate. It is also reported the only space with potential is Cremorne Wharf but I was under the impression that this is a safeguarded wharf and as such development of this nature should not take place – I feel it is important to keep this Wharf safeguarded.</p> <p>I like the fact that creative enterprises are encouraged in this area, and here special mention goes to the Furniture Cave – I am all in favour of the furniture/antique businesses in this building but, at the same time, there are also 3 large entertainment businesses – all with late night licences and more of this type of business would not be welcome.</p> <p>In conclusion, whilst there is a healthy mix of residential and commercial here, I believe we are now at capacity, particularly bearing in mind current developments, and I would urge restraint in creating new industrial space and especially should existing building owners apply to increase the height of current buildings.</p>	
Wentworth Andersen (Mr Biggin)	Wentworth Andersen	No – market forces should drive the locations.	no	Yes – they have retained special character that could be capitalised upon with careful blends of use class.	Yes - The areas differ significantly	<p>As a town centre use, the starting point is that new offices should be located within a town centre. The Local Plan recognises that new offices may be appropriate in new locations, including within the Employment Zones, but will be subject to the requirements within the NPPF.</p> <p>The Council concurs with the view that offices in the Earl's Court area should be</p>

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Gerald Eve LLP (Neil Henderson)	Gerald Eve LLP (Cadogan Estate)	<p>This option seeks to apply a "town centre" first approach with regard to employment floorspace. This would equate to a priority for protecting employment floorspace within town centres and ensuring that any new employment floorspace is directed towards a town centre location.</p> <p>With regard to the protection of the existing</p>	The Estate has no property holdings in the Earls Court area and is therefore not qualified to comment on this matter.	This Option is not applicable to the Estate given that they have no land holdings within employment zones.	This Option is not applicable to the Estate given that they have no land holdings within employment zones.	<p>The Local Plan does not attempt to prioritise office floorspace over A class within a town centre. All are "town centre uses" in terms of the NPPF.</p> <p>The Local Plan continues its current approach whereby office uses are generally protected, but not when within a town centre and being replaced by an A1 or social and community use.</p> <p>Support for directing new office floorspace to town centres (subject to the requirements of the sequential test and the provisions of the NPPF) is noted.</p>

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		<p>employment floorspace, the Council's current core strategy policy CF5, allows for the loss of office use if it is:</p> <p>"within a town centre and is being replaced by a shop or shop floorspace, by a social and community use which predominantly serves, or which provides significant benefits to Borough residents; or by another (not residential) town centre use where this allows the expansion of an adjoining premises;"</p> <p>The Borough is extremely dense in nature and there are many competing land uses which need to be catered for. In addition to the provision of offices and employment floorspace, the creation of new retail floorspace is of critical importance to ensure that the Borough maintains its reputation as a world class shopping destination. The Borough is facing increasing competition from competing retail centres from outside the Borough and it is critical that existing planning policy maximises the flexibility for new high quality retail floorspace to be achieved.</p>				

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		<p>Although it is acknowledged that there are clear benefits in locating offices within a town centre and close to transport hubs, there are equally as many benefits for prioritising the creation of new retail floorspace over the loss of employment floorspace. The consequence of not maintaining the current flexible approach in planning policy would be to put additional pressure on new retail accommodation forcing it outside of town centres. In addition, it would make it more difficult for existing retail accommodation to evolve and adapt and would dilute the existing critical mass of retail within the town centre. Given the choice, placing a priority of protection on employment floorspace over retail floorspace within a town centre would create significantly more problems than the current policy approach.</p> <p>As a result, the Cadogan Estate would not support a policy basis which creates a priority protection for employment floorspace within town centres.</p> <p>With regard to new</p>				

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		employment floorspace, the supporting text to this option suggests that there would be a preference for new large scale employment floorspace to be located within town centres. This is in fact already the basis of national legislation in the application of the sequential approach. Provided an emerging policy was consistent with the national policy approach, the Estate would support the basis of this as a consideration for any new town centre uses.				
St Quintin and Woodlands Neighbourhood Forum (HENRY PETERSON)	St Quintin and Woodlands Neighbourhood Forum				<p>Employment Zones</p> <p>3.1 The Borough has three designated Employment Zones (Lots Road, Kensal, and Freston/Latimer). A review of the Enterprise chapter of the Core Strategy should take the opportunity to review these designations. Do the original reasons for the designation of these zones remain valid? Are their boundaries appropriate? What has been the impact of the Core Strategy policies which have been applied to these Zones, as compared with the rest of the Borough? Does the concept of an EZ still have validity, when applied to a central London borough where residential and business uses and activities have always been mixed (a characteristic welcomed as creating 'vitality' in other parts of the RBKC Core Strategy?)</p> <p>3.2 The St Quintin and Woodlands Draft Neighbourhood Plan looks in detail at what has happened in the</p>	<p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The Council notes that the StQWNP, when 'made', will form part of the Borough's development plan. This includes a series of detailed and specific policies which relates to the northern part of the Latimer/Freston Employment Zone. As the NP will form part of the Borough's development plan it would not be appropriate to repeat them within the Local Plan Policy. The Local Plan does, however, include reference to the StQWNP.</p>

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					<p>Latimer Road part of the combined Freston Road/Latimer Road Employment Zone, and demonstrates why UDP and Core Strategy policies (applied since the late 1990s) have not proved successful.</p> <p>3.3 The original case for the creation of this combined Zone is unclear. Until a borough boundary change in 1996 the west side of the road lay in LBHF and formed part of the Wood Lane Employment Zone. Light industrial/warehouse uses were encouraged by the LBHF policies at that time, leading to the construction of Units 1-14 in what was then termed the 'Latimer Industrial Estate'. The east side of the road in RBKC was not part of an Employment Zone, and contained mixed uses with workshops, light industry, offices and housing.</p> <p>3.4 Subsequently a combined Freston Road/Latimer Road Employment Zone was designated, with a boundary line drawn round 4 separate sections of properties in Latimer Road. The Westway had already created a physical separation between Freston Road and Latimer Road, with no vehicular access between the two parts of the combined EZ. Did such an 'Employment Zone' ever make much sense?</p>	
Golborne Forum (Susie Parsons)	Golborne Forum	No comments				Noted.
Woofie Ltd (Tanya Sarne)	Woofie Ltd	All business space is best developed in town centres. Town centres are where the council should be promoting offices, rather than trying to preserve them wherever they happen to be	YES. It must seek to preserve the business floorspace, not waste money pulling down what is historic and serviceable.	I believe it should NOT take a different approach	I feel that Latimer Road is often unfairly tied in with Freston Road, when they are hardly very close to each other. It makes no sense and should be dropped. The Neighbourhood Plan I have been consulted on does show the best policies that should be used in Latimer Road.	The Council recognises the value of its remaining stock, wherever it may be. As such the loss of offices outside of town centres will not be supported. Whilst the NPPF does confirm the town centre first approach for new town centre uses (offices included) there is no suggestion that such uses should be lost when not within a town centre. The test is that uses

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						<p>should only be protected when there is a "reasonable prospect" of that unit being used for the allocated use. The Council is satisfied that this is the case across the Borough.</p> <p>The Council concurs with the view that offices in the Earl's Court area should be protected. This approach is supported by the Council's viability report which confirms that there is no reason to suggest that offices in Earl's Court are inherently unviable. The individual circumstances of an individual unit will be considered as and when a planning application is made. This consideration will include the nature of the office market in Earl's Court at the time of the application.</p> <p>The Council takes the view that distinct policies are needed if the business function and character of the Borough's Employment Zones are to be maintained.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The Council notes that the StQWNP, when 'made', forms part of the Borough's development plan. This includes a series of detailed and specific policies which relates to the northern part of the Latimer/Freston Employment Zone. As the NP will form part of the Borough's development plan it would not be appropriate to repeat them within the Local Plan Policy. The Local Plan does, however, include reference to the StQWNP.</p>
N/A (Chadi Semaan)	N/A	Town centres are the logical place for businesses to succeed.	The employment zones in the borough are incomparable. Earl's Court is wildly different	The employment zones are too restrictive. There is a natural progression that will encourage	If they are define appropriately, yes. But, the problem is that historically these areas have been poorly defined,	The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship

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		They are easy to get to and employees and clients are happy to work/visit these areas.	from Kings road, Freston road, and Latimer road. They are all completely different from one another and consequently attract different tenants and have different problems.	growth. Quiet areas will remain quiet and busy areas with excellent transport links will remain attractive to businesses.	leading to the problems we see in North Kensington today.	<p>between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses. The Council notes that neither Earl's Court nor the King's Road are Employment Zones.</p> <p>The Council notes that Employment Zones will continue to grow organically. Specific policies are however necessary if they are to retain their function as centres for businesses.</p>
Clobb Properties Ltd (Richard Ehrman)	Clobb Properties Ltd	Yes. Town centres are obviously better suited to business, because they have the amenities and transport employers are looking for.	Why only Earls Court? The St Quintin and Woodland draft Neighbourhood Plan has produced detailed proposals to revive Latimer Road. These should be taken seriously.	The borough is anyway very restrictive in its approach to business use. The extra restrictions in the Enterprise Zones, by discouraging A and D uses, risk making the zones unattractive and sterile, and are if anything counter productive.	Yes, and especially for Latimer and Freston Roads which are very different in character and not even geographically contiguous. They should not be part of the same Enterprise Zone, but have policies tailored to their separate needs.	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The StQWNP, when 'made', will form part of the Borough's development plan. As such the detailed policies relating to the</p>

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						<p>northern part of the Employment Zone will be considered when determining a planning application.</p> <p>The Council notes that Employment Zones will continue to grow organically. Specific policies are however necessary if they are to retain their function as centres for businesses.</p>
Kerry Davis-Head		Yes. Each area should be looked at individually	yes. Earls court is one whole new area now	each area should be considered separately. And policy changes made to take account of changes within the area, ie new and future developments. Transport changes. Conservation status.	yes. Definitely	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council concurs with the view that offices in the Earl's Court area should be protected. This approach is supported by the Council's viability report which confirms that there is no reason to suggest that offices in Earl's Court are inherently unviable. The individual circumstances of an individual unit will be considered as and when a planning application is made. This consideration will include the nature of the office market in Earl's Court at the time of the application. The Council also notes that the areas is likely to change in character as the development within the Earl's Court Opportunity Area takes place.</p> <p>The Council concurs with the view that it should continue to take a different approach for development within Employment Zones than that elsewhere in the Borough. This reflects the important function that the Employment Zones have in providing the Borough's stock of</p>

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Cremorne Residents' Association of Lots Village (Davis-Head)	Cremorne Residents' Association of Lots Village	Yes	Yes	yes	<p>The LREZ should be treated as sui generis as it is not a town centre but a recognisable cluster which is "very well occupied, useful and financially viable".</p> <p>This area is very popular and once people have office space here they tend to stay here therefore spaces seldom come on the market The Council's existing approach (3.47) remains entirely valid, although the LRPS development will radically alter the balance between commercial and residential uses within the Lots Village area (there are discrepancies in the various reports regarding Lots Road Power Station, one report states there is no office content, another says there is, according to the last planning application there is office content). The principle conclusion must be that no more residential development should be contemplated because the LRPS development will at least double the residential population of the area while providing only a modest amount of business space. Strict conditions regarding hours and noise should be imposed on both town centres and non-town centres, with perhaps a slightly more lenient approach to the 'high street'</p>	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council notes the consultee's view that a different approach should be taken for Earl's Court than the rest of the Borough. However, no further details have been given. The Council is of the view that the office sector within Earl's Court does continue to play an important role. Similarly, the Council has evidence which confirms that Earl's Court is a viable office location.</p> <p>The Lots Road Employment Zone cannot be considered, in planning terms, to be a sui generis use. It is made up of a series of properties all will their own uses. The majority of these will lie within a specific class within the use classer order.</p>

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					<p>Specific to lots village. Small creative businesses should be encouraged and large corporate offices discouraged. The small businesses keep the two pubs viable at lunchtimes and Friday nights. They keep places like lots larder and the kitchen and the cave busy at lunchtimes. Worlds end studios try hard to integrate with the residents and work with them, this type of office should be encouraged We are part of the chain that links the Chelsea design quarter and Chelsea Harbour design centre. Hours should perhaps be controlled to prevent evening and weekend working by large numbers should that ever occur. Especially if the offices overlook residential buildings (thankfully very few) And meter parking should be available for the businesses. The warehouse type businesses need assessing for noise/congestion We have a small garage that's an asset and causes no problem even though it's within a residential street, because it is small. A school of 1000 pupils causes more noise and traffic and disruption than the existing businesses put together.</p>	<p>The Council does propose allowing the introduction of some residential floorspace where this supports the business function of the area. Whilst this residential floorspace will put pressure upon existing infrastructure, this should be mitigated against by the associated CIL payment, or through s106 contributions as appropriate.</p> <p>The Council does support Lots Road Employment Zone as a location for small and medium businesses. However, it does not preclude the provision of larger offices as well. This diversity is important to maintain growth in the office sector.</p>
333 Latimer road (Corrett)	333 Latimer road	Yes	RBKC should take a different approach to Latimer Road which has languished for over a decade	No, and in particular Latimer Road should not be an employment zone. It should be mixed use.	Definitely. It is time RBKC addressed the problems in Latimer Road	<p>The Council concurs with the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre. Large offices outside these locations may also be appropriate but will be subject to the requirements of the sequential test.</p> <p>The Council concurs with the view that it should continue to take a different</p>

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						<p>approach for development within Employment Zones than that elsewhere in the Borough. This reflect the important function that the Employment Zone have in providing the Borough's stock of business uses and for the local and wider economy. Development within the Employment Zone must be business lead. This is not the case elsewhere within the borough.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The StQWNP, when 'made', will form part of the Borough's development plan. As such the detailed policies relating to the northern part of the Freston/Latimer Road Employment Zone will be considered as such when determining a planning application.</p>
DP9 LTD (Hannah Willcock)	DP9 LTD (BH NHS Trust)	Option one states that 'the Council should take a different approach for business uses within town centres than elsewhere.' We understand that office developments are usually concentrated within larger town centres, however we do not agree that a single approach towards town centres should be taken. As Frost Meadowcroft outline within paragraph 3.6.6 of their report demand can be building led. They use the example that there are very few large	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.	This option is not relevant to the Chelsea Masterplan development proposals and we have no comments.	<p>The Council is of the view that town centres are appropriate office locations. There is a symbiotic relationship between town centres and office uses. The Local Plan is not, however, prescriptive about the type of offices which will be appropriate within a town centre.</p> <p>Similarly the Local Plan offers some flexibility and will allow the loss of some office floorspace when to an alternative town centre use.</p> <p>The particular circumstances associated with the Royal Brompton Hospital are recognised. The draft Brompton Hospital SPG recognises the benefits associated with "enabling" development, to allow the bringing forward of development to secure long term future of the Brompton Hospital.</p>

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		<p>floorplates or larger headquarters in west London, and when space becomes available occupiers will consider these opportunities on availability rather than prioritised by location or pricing. The same will apply for town centres, the uses within the town centre are likely to be based on the type of space available to them.</p> <p>The borough should cater for flexibility where the loss of a business floorspace to residential or other uses where the wider benefit is greater. As outlined above, to ensure that a correct balance is struck, applicants should demonstrate the significance of the public benefit.</p>				
DP9 Ltd (Rachel Crick)	DP9 Ltd (60 SA Ltd)	<p>3.28 We do not support Option One which states that 'the Council should take a different approach for business uses within town centres than elsewhere', as we consider that different town centres have different characteristics in relation to business uses, and warrant different levels of protection, if any. Accordingly we do not consider that a single approach towards town centres would be successful and effective.</p>	<p>3.30 The Council should therefore take a different approach for business uses within individual town centres, as well as elsewhere, such as in employment zones (or within new districts, should these be created as per Question 2 Option Four above). Flexibility for the market to direct where new office development should come forward in the borough should be encouraged, as this will regenerate the north of the borough and free up town centre sites for mixed retail, leisure and residential uses.</p>	<p>3.31 We support Option Three which states that 'the Council should continue to take a different approach to development within Employment Zones than elsewhere in the Borough'. The current Core Strategy is too restrictive in relation to employment zones and resists non-business uses, however as identified above housing could be delivered in Employment Zones without adversely impacting on the operation of the existing creative industries which are located there. PBA conclude in the Commercial Property Study that in employment zones 'there is potential to increase the provision of</p>	<p>3.33 Option Four explores the opportunity to 'develop policies tailored to the character of each Employment Zone'. We support the introduction of further flexibility within Employment Zones, for example the promotion of a range of supporting uses, such as cafes, shops, gyms etc to support local businesses and create new communities in the Kensal Employment Zone, would still provide job creation. We consider that the Council should support a mix of uses, where the primary use remains enterprise, but ensuring that such developments are served by adequate facilities. This would accord with NPPF and London Plan policies which both seek to promote mixed use</p>	<p>The Council seeks to protect office uses across the Borough. However, the Local Plan is clear in supporting the town centre first approach for new town centre uses. As such a range of office types are considered to be appropriate within a town centre.</p> <p>There is a symbiotic relationship between town centres and office uses. A business will benefit from the services offered by a town centre as well as from the ease of access. In turn the office use supports the ongoing viability of the centre. An office use, and its employees will help maintain the diversity of uses within the centre and directly contribute to those visiting, and using, the centre.</p>

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		<p>3.29 PBA do not make a clear recommendation to the Council in relation to whether offices in higher order town centres should continue to be protected. They advise that the possible case for on-going protection would rest on two arguments: a) all town centres house office-based services for local residents, though sometimes on a very modest scale; and b) that large centres (specifically Notting Hill Gate and the Kings Road) contribute to creative clusters and these clusters could be threatened (paragraph 5.7). No strong rationale is provided by PBA to justify the continued protection of offices in other centres such as South Kensington. Indeed, South Kensington is not identified by PBA as providing a significant 'creative cluster'.</p>		<p>supporting services such as cafes and small shops to meet every day needs. This may help reduce the feeling of isolation many firms have reported' (paragraph 5.10), which supports the case for mixed use developments across the borough.</p> <p>3.32 Adopting such an approach would assist in creating sustainable communities, encourage investment in employment zones, improve the sense of security and surveillance and help to create a better sense of space. A range of employment generating uses should be supported in employment zones to meet demand, and this should not be restricted to the delivery of small and very small offices (in accordance with the current Core Strategy).</p>	<p>developments to encourage multiple benefits from the use of the land.</p>	<p>As such, the Local Plan seeks to protect offices across the Borough, both within town centre and across the Borough.</p>
Tania Martin		<p>Yes, but I am not sure where RBKC town centre is?</p>		<p>Employment Zones are important, but do not seem to work as the zoning does not allow for businesses to flourish, as they cannot develop organically to suit the needs of the employees (cafes/gyms/shops etc). Mixed use, flexibility on A&D use and Residential as laid out in the S T Quintin & Woodland draft Neighbourhood Plan</p>	<p>Yes, as each Employment Zone serves very different parts of RBKC community.</p>	<p>The Local Plan sets out where the Borough's town centres are.</p> <p>The Council concurs with the view that it should continue to take a different approach for development within Employment Zones than that elsewhere in the borough. This reflect the important function that the Employment Zone have in providing the Borough's stock of business uses and for the local and wider economy. Development within the Employment Zone must be business lead.</p>

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						<p>This is not the case elsewhere within the Borough.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The StQWNP, when ‘made’, will form part of the Borough’s development plan. As such the detailed policies relating to the northern part of the Freston/Latimer Road Employment Zone will be considered as such when determining a planning application.</p>
Laura Michaud	N/A	Town centres and areas with good transport links should house most of our businesses, leaving the quieter residential streets to enjoy the tranquility.	The employment zones within RBKC should be segregated. The areas in Freston Road and Latimer Road differ hugely. The kinds of tenants that occupy these premises differ wildly (new innovation, media, fashion vs storage and low use units).	If that is the case, the zones need urgent redefining. Freston road has excellent tube, overground and bus links. Latimer Road and North Pole Road falls quite far behind that and shouldn't be defined in the same manner	I am unsure whether trying to manage each employment zone individually is beneficial. A very natural progression catering for demand would be created if uses were relaxed	<p>The Council recognises that town centres and other accessible areas are appropriate locations for new business uses. However, the Local Plan also recognises that other areas may also be suitable, subject to the other policies within the Local Plan. This will include the impact on a new business use on the “tranquillity” of a residential area.</p> <p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The Local Plan supports a greater diversity of uses within an Employment Zone as long as the business function of these areas is supported.</p>
Kensington Society (Michael Bach)	Kensington Society	Q3 What, if any spatial policies should the Council adopt in respect of business use?	The Society does not consider that a different approach is needed. A growing shortage of office space elsewhere in the Borough may change the	The Society supports the objectives for Employment Zones to retain commercial uses through maintaining the supply of affordable workspace.	The Society, whilst wishing to support the continued designation of Employment Zones, considers that policies tailored to each Employment Zone should be explored.	The Council concurs with the views of the consultee that it is appropriate to protect offices across the Borough. These add to the diversity of uses within the Borough

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		<p>The Society strongly supports the retention of office/business uses as proposed in Core Strategy Policy CF5 namely:</p> <ul style="list-style-type: none"> • very small and small offices throughout the Borough • medium-sized offices in Employment Zones, higher-order town centres, other accessible areas and primarily commercial mews; • large offices in higher order town centres and locations with a PTAL of 5 or greater. (NB: This is slightly tighter than the Core Strategy) <p>And to guide new office development into the same locations.</p> <p>The reason for this is to secure a more sustainable pattern of development. In line with the NPPF (paras 24 (town centre first), 34 (choice of locations which minimise the need to travel and maximise the use of sustainable transport modes) and the Glossary definition of Edge of Centre for office development – locations within 500 metres of a public transport interchange.</p> <p>Q3.1 Option 1: The Council should take a</p>	<p>vacancy rate and the yields in Earl's Court.</p>	<p>The Society, however, considers that there may in some areas where the Council could explore the opportunities for mixed-use development which maintains or even increases business floorspace by allowing some additional housing to cross-subsidise the supply of modernised affordable workspace.</p> <p>In particular, the Society supports the need for smaller business space units and, as mentioned above, would resist the introduction of large business/office developments.</p>		<p>and contribute to the local and the wider economy.</p> <p>The Local Plan endorses the town centre first approach for new offices, directing new large offices to town centres and to other accessible areas. However, it also recognises that other areas may also be suitable, subject to the requirements of the sequential test for new business uses. This includes the Employment Zones.</p> <p>The Council is concerned that an approach whereby larger offices will be resisted outside of a town centre will result in a reduction in new office development coming forward. This would be regrettable given that few parts of the Borough are inherently unsuitable for office development.</p> <p>The Council does not intend to amend the definition of “accessible” in terms of public transport accessibility. This is a definition which reflects that of the GLA.</p>

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		<p>different approach for business uses within town centres than elsewhere</p> <p>The Society supports the Core Strategy policy, but would like to increase the focus on town centres in line with the NPPF and the preferred locations defined in the Saved UDP policy - within 400m of named major public transport interchanges.</p> <p>The Society considers that in the past too many large office developments have not been in accord with these definitions – such as major offices in Freston Road which are in areas with PTALs 2 or 3.</p> <p>3.43: The Society considers that the Core Strategy's definition of "accessible" needs to be tightened to PTAL 5 or greater to avoid locations with relatively poor accessibility (2 or 3) or merely "good" (4). The Society therefore considers that the highest trip-generating uses should be directed to higher order town centres or within 400m of major public transport interchanges as in UDP Policy E1 (d) and para 6 xiv.</p>				

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		Note that this does not run counter to the market – the market has chosen out of centre locations because the Council has failed to operate national and Borough policy and developers have made a windfall profit from these departures.				
Tate		Q 3.1 asks whether the Council should differentiate between business space in town centres and elsewhere, which at the moment it does not? My answer to this is that town centres are where RBKC should be promoting offices, rather than trying to preserve them wherever they happen to be		No	Q 3.4 asks whether the Council should develop policies tailored to the character of each Enterprise Zone. Continuing to put Latimer Road in with Freston Road, when they are not even very close to each other, makes no sense and should be dropped.	<p>The Local Plan supports a town centre first approach to new office development, although recognises that other less accessible locations may also be suitable.</p> <p>The protection of offices across the Borough is appropriate as it ensures that the contribution that offices play to the local and wider economy is maintained. The Council is satisfied that nowhere within the Borough is inherently unsuitable for offices. The individual circumstances of individual properties will be assessed as and when a planning application is made.</p> <p>The StQWNP, when 'made', will form part of the Borough's development plan. As such the detailed policies relating to the northern part of the Freston/Latimer Road Employment Zone will be considered as such when determining a planning application.</p>
Mr Perryman					Yes, policies should be tailored to each particular zone - the needs of Latimer Rd and Freston Rd, for example, would seem quite different	<p>The Council recognises the different character of the three Employment Zones. This is reflected within the relevant place chapters. However, a single policy is considered appropriate as the principal function of the Employment Zones is identical for all three – as centres for business uses.</p> <p>The StQWNP, when 'made', will form part of the Borough's development plan. As such the detailed policies relating to the</p>

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						northern part of the Freston/Latimer Road Employment Zone will be considered as such when determining a planning application.
Jane Heffron			You mention a different treatment of Earl's Court in your papers and given the new development there it might be an idea to consolidate purpose-built business premises there to free up housing elsewhere in the borough and eliminate some of these problems. That would solve two issues at once: make more housing available and make for easier preservation of existing neighbourhoods where people can live.			Noted. The Earls' Court Strategic Site does include the provision of 10,000 sq m of office floorspace. However, there is a need for additional office floorspace over and above this figure. As such it would not be appropriate to release employment land elsewhere in Earl's Court.
GVA (Tom Edmunds)	Notting Hill Gate KCS Ltd			We support the need for a range of employment sites and employment land in the Borough, offering flexibility and diversity across the Borough's stock of such sites and floorspace, and ensuring that an overconcentration or overreliance on any single type of floorspace or type of location is avoided. Maintaining the Borough's employment zones will offer flexibility across the Borough, which will enable the development of area-specific policies – policies relating to town centres for example – to not be unduly restrictive or limited in their scope.		The Council concurs with the consultee's view that it should be seeking to support a diverse range of office types across the Borough. Support for maintaining the business function of the Borough's Employment Zones is also noted.
Mougin					The current policy has not worked for the Latimer Road area. This road needs more energy and the planning policy needs to be relaxed to allow for more varieties and to allow for a much needed revival of Latimer Road.	The StQWNP, when 'made', will form part of the Borough's development plan. As such the detailed policies relating to the northern part of the Freston/Latimer Road Employment Zone will be considered when determining a planning application.

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					Latimer Road also needs to be split from Freston Road	<p>This includes support for a greater range of uses within the northern part of the Employment Zone.</p> <p>The Local Plan also supports the introduction of residential uses across the Employment Zone as long as this is associated with an uplift in the quality and quantity of business uses.</p> <p>The northern part of the Employment Zone is currently in a healthy position with very low vacancy rates. Its suitability as an office location has been supported by the Inspector at the examination into the StQWNP.</p>