



**RBKC Core Strategy EIP: Post Submission Changes
Further Representations to Matter 7: Fostering Vitality (Policy CF5 and supporting
text)**

On behalf of Chelsfield (179625) September 2010

1.0 Chelsfield's representations

- 1.1 This Written Statement is submitted by Chelsfield and follows the representations made in respect of policy CF5 in July 2010 and the subsequent Statement of Common Ground agreed between Chelsfield and the Royal Borough of Kensington and Chelsea (RBKC) on 26th July 2010.
- 1.2 Both these documents were discussed at the Examination in Public at Matter 7 on 27th July 2010, where the Inspector invited further comments from participants in respect of the rolling changes issued by RBKC.
- 1.3 These representations do not seek to repeat those made initially in July 2010. However, a summary of the key points raised at that stage, which led to the agreement of the Statement of Common Ground, are set out below for ease of reference.
- 1.4 The representations stated that Chelsfield were concerned that as drafted within the Submission Version of the Core Strategy, Policy CF5 was unsound as it was not justified, flexible nor consistent with national policy. This was considered for the following reasons:

Justified

- That the restriction against the delivery of residential floorspace on sites currently in office use had not been a clear objective throughout the Core Strategy process
- That the evidence base did not clearly indicate that large scale offices outside of town centres should be explicitly protected;
- That the assumptions made within the Core Strategy in respect of projections were inconsistent and windfall sites for new office development were extremely unrealistic based on the historic delivery of office floorspace across the Borough through windfall sites.

Flexible

- The draft policy prevented sites in office use from changing to other uses even where they might perform little beneficial economic role or may even be subject to long term vacancies;
- On the basis that the identified need for new office floorspace would easily be met, and exceeded, by forecast supply it was considered



essential that the wording of the policy be amended to allow reasonable flexibility for some elements of existing office floorspace and sites to be lost where it could be demonstrated that these were unviable in the long term and the replacement use would meet the other objectives of the Core Strategy;

- There are a few existing large office buildings which currently exist in scattered and isolated locations elsewhere in the Borough. Further details of these were submitted;
- The quantum of office property affected by the emerging policy which falls outside of the Town Centre and Employment Zones and their immediate environs is around 4% of the Borough's total stock of large offices outside of defined Higher Order Town Centres;
- The suggested change to the wording of the policy, and also the agreed change with RBKC, by removing the protection to large offices in accessible areas outside of the town centres, would not undermine the Core Strategy and would assist in the delivery of the Strategic Objectives.
- Added flexibility would also deliver other plan objectives, including the delivery of new housing across the Royal Borough and historically RBKC had struggled to meet their housing targets on a year on year basis and there was a heavy reliance on windfall sites coming forward.

National Policy

- Policy EC5, and elsewhere within the document, places the emphasis on town centre uses first being located within a town centre, followed by an edge of centre location and finally out of centre locations with good public transport accessibility.
- The Core Strategy seeks to protect all existing large offices with good public transport accessibility. Given its position close to Central London, the vast majority of the Royal Borough has 'good' public transport accessibility. However, this alone does not make for a successful office location. Other important factors will include, for instance, the presence nearby of other commercial and supporting uses. The existing policy is therefore not consistent with the objectives of PPS4.

1.5 As a result of the representations to the Core Strategy the changes to the policy was discussed and agreed with the RBKC through the Statement of Common dated 26th July 2010. These amendments allow for the change of use of existing large offices, in accessible locations, where they are located more than two minutes walk from defined frontages to other uses in order to deliver other Core Strategy objectives.

1.6 These changes were discussed further at the Examination in Public on 27th July.



- 1.7 Following this discussion Chelsfield would like to add the following key points to their representations to the wording of Policy CF5 within the Submission Core Strategy and support for the amendments scheduled in the post submission changes document.
- 1.8 The background to these changes being agreed with RBKC focussed on the **flexibility** of the existing policy on the ability to deliver other, primarily housing, Core Strategy policy objectives and the limited impact that the agreed change would have on the Boroughs total large office stock; some of which are in extremely isolated locations, in terms of a functional connection to the existing town centre frontages or boundary, as relevant, or are separated from the centre by physical barriers such as main routes through the Borough.
- 1.9 Within the initial representations the draft report prepared by Jones Lang Lasalle looked at the number of large offices outside of the Higher Order Town Centres. The amendments to Policy CF5, as set out within the Statement of Common Ground, refer to town centres rather than Higher Order town centres which would reduce further the impact of the policy change on the existing large office stock within the Borough.
- 1.10 The function of Planning Policy Statement 4 (2009) is to support sustainable economic growth with the focus on town centres. However, as outlined above and detailed within the full representations it is considered that RBKC will have more sufficient supply of office floorspace to provide for the identified demand across the plan period. Therefore there is a limited requirement to call on PPS4 for the protection of economic growth within the Royal Borough.
- 1.11 Whilst PPS4 does state that for the purpose of a sequential assessment for offices locations within 500m of a public transport interchange should be considered as edge of centre locations, PPS4 does also state that such locations should be well connected to the centre by means of easy pedestrian access (EC15.1c) and that out of centre sites should have a higher likelihood of forming links with the centre (Policy EC5.5c).
- 1.12 Notwithstanding this, it should be noted that 500m distance relates to proposals for new office developments and PPS4 does not state at any point that this should be taken into account in considering proposals for the loss of an existing office. Furthermore, in accordance with the sequential approach sites which are located within a town centre should be assessed before any edge of centre site. It should also be noted that the clear preference within the emerging Core Strategy is for very small and small offices and there is the highly likely potential within the Royal Borough that sequentially preferable sites for such uses would be available within the defined frontages.
- 1.13 In terms of the 'two minute' walk as identified within the proposed changes; it is



considered that this is relevant to the character of the Royal Borough and indeed this was put initially forward by RBKC. This is considered to be a sufficient distance from the defined frontages – noting that the Borough does not have defined town centre boundaries – and other neighbouring centres by which to define a change in character of the centres.

- 1.14 In summary the changes agreed with RBKC through the Statement of Common Ground are strongly supported and it is considered essential that these changes are carried through to the final version of the Core Strategy to ensure that the policy is sufficiently flexible and therefore sound.