

KENSINGTON SOCIETY RESPONSES TO RBKC/26, RBKC/31 & RBKC/35:

RBKC/26: Statement of Common Ground RBKC & Chelsfield

The issue was “the extent to which it is necessary to protect all large offices within accessible areas (PTAL4 or greater) or whether some flexibility should be afforded to these uses”.

The Society considers that:

- this policy for preferred locations for large-scale office developments **and** for their retention should be restricted to PTALs 5-6, which constitute highly-accessible areas, as defined by the London Plan for monitoring policy compliance;
- in accord with para 2.4 of the agreement, “large offices are not considered to be appropriate uses within Employment Zones” – compare this with the Council’s simultaneous attempt to reverse policy CF5 (k);
- the proposed rewrite of Policy CF5 (a) should not be accepted and instead propose:
 - “a. protect:
 - very small and small offices throughout the Borough, especially on the upper floors in town centres and primarily commercial mews;
 - medium-sized offices within the Employment Zones, Higher-Order Town Centres, and highly-accessible areas; and
 - large offices within, or close to Higher-Order Town Centres and other highly-accessible areas, except where: ...”

The Society **objects** to the proposed changes in para 2.7 relating to para 31.3.33 and, in particular, the proposed new para after para 31.3.33, which refers to 160m and a two-minute walk because;

- this are arbitrary – based on “popping out of the office to get a sandwich at lunchtime” – an invented concept;
- it is specifically designed to exclude a specific site (205 Holland Park Avenue) which is PTAL 6 – a preferred location for offices;
- it is just over the road from Shepherds Bush town centre in Hammersmith and Fulham.

The Society considers the proposed changes should be rejected.

RBKC/31: Council's Response to Kensington Society's Representations on the Quantum of Offices

The Society rejects the Council's insistence on using 14.7sqm(net) floorspace/worker for new offices because:

- it relates to the existing stock and the past usage of space – it should relate to new stock produced in the next 20 years and the use of new working practices.
- the evidence of the London Office Policy Review (2009) suggest that changes in office planning and work practices suggests that new offices were using less floorspace/worker or workstation (as an example the Society quoted the current Space Programme changes in Kensington Town Hall, where floorspace (net)/worker was already less than 10sqm. (See note in Annex 1 of the Society's final Issues paper

The Council forecasts that the existing pipeline will be sufficient to meet office demand to 2017 (para 1.15). The remaining need for the second half of the plan period (2018- 2028) is calculated to be a further 23,000sqm.

The Society considers that all the data needs recalibrating to relate to the situation for the period 2008-2028. References, such as those in para 1.5 to 4,700 additional office jobs 1.6, to 69,200sqm of space both being required in 2004-2028 need to be adjusted. Para 1.13 of the paper seeks to clarify the evident confusion of time periods, scale of the pipeline and the residual requirement.

The Society considers that it would be appropriate to phase the development of new office space as proposed in PPS4.

RBKC/35: Large-scale Office Developments in Employment Zones

The Society objects to this proposed change to Policy CF5 (k) because:

- the original policy, to resist large-scale office developments in Employment Zones was in accord with PPG13 and PPS4 and in general conformity with the London Plan in that high trip-generating uses should be in town centres or close to public transport interchange – none of the Employment Zones have high public transport accessibility.
- The “new” policy has been brought forward to enable “business centres” to be developed, but no evidence has been brought forward on the requirement for units over 300sqm within such centres.

The inclusion of medium-sized units is not justified.