**ENTERPRISE CORE STRATEGY REVIEW – ISSUES AND OPTIONS**

**RESPONSE FROM ST HELENS RESIDENTS ASSOCIATION**

**The Association’s interest in this Review is in how RBKC policies will in future be implemented in relation to the Latimer Road part of the Freston Road/Latimer Road Employment Zone.**

This existing pocket of employment lies on the periphery of the Borough and appears to have received little attention from the council over many years. It is now included in the area proposed for the St Quintin and Woodlands Neighbourhood Plan, and the revival and regeneration of this small employment area forms one of the Plan’s main ambitions.

This association (as the ‘relevant body’ seeking designation of the neighbourhood forum and plan area) seeks to ensure that the current Enterprise Review leads to borough-wide policies with sufficient room to allow a neighbourhood planning process to have some real impact.

We would welcome an updated set of employment and enterprise policies which:

* **are flexible enough** to take account of a fast-changing evidence base, continuously updated. While the overall prospects for the economy look relatively healthy compared with other parts of London, no one can predict with certainty where the Borough’s housing and office market will be in 5 years time.
* **reflect rapid changes** in how people wish to live and work, including the growth of part-time and ‘portfolio’ careers and increased levels of working from home across a range of professions (including those in the creative industries which feature strongly in the Borough’s thinking).
* **operate at a fine spatial grain**, are not ‘one size fits all’ across the Borough, and acknowledge that the characteristics of housing and employment in the borough can change literally from street to street.
* help to ensure that longstanding residents and their families have at least a chance of remaining in a part of London now the subject of market forces which are global rather than national
* help to foster the mixed communities which any city needs for long-term sustainability.

The views set out below reflect discussions held by the association with local businesses and landlords in the Latimer Road area and in its two shopping parades (St Helens Gardens and North Pole Road). These views have also been tested with local residents at our regular four monthly open meetings (attendance ranging from 50 to over 100) which have been held since the association’s formation in 2008.

The slide set presented at our November 2012 meeting, on Latimer Road, is attached for information.

The history of Latimer Road (see slides) is that it has always included a mix of residential and commercial business uses (notably laundries in the 19th c). The introduction of single storey industrial units in the 1980s, on the western side of the road, broke up the original built form of the street.

In terms of its connection to and integration within the neighbouring residential area of the St Quintin Estate, Latimer Road area has suffered from these earlier planning decisions. It has lost the vitality that it once had, as shown by a comparison of photographs from 1900 to the present day. Many of the purpose-built industrial units are now used for storage or purposes which create no footfall.

This is turn has led to the disappearance of local shops in the road, conversion of the former Latimer Arms pub to housing association use, recent loss of the North Pole pub to a Tesco Metro, and a current application for change of use of the former Volunteer pub/Ariadne Nektar pub/restaurant to a single family dwelling (which this association is resisting).

One small Thai restaurant, and a fish and chip shop on the corner of North pole Road, survive. Employers in the road (Designers Guild and others) have been forced to provide their own facilities for staff to eat and have a cup of coffee, meaning that employees do not leave the premises during the day. Hence footfall diminishes further, in a self-reinforcing cycle, making the street nearly deserted during the day and with sections of it feeling relatively unsafe at weekends and during the evening.

The proposed pedestrian/cycle link from the Imperial West site to Latimer Road should restore a level of footfall at the southern end of the road. But this link looks unlikely to be constructed for some years yet.

**In the meantime the area continues to decline and it is urgent that the council signals a change of planning policy towards the area, with scope to encourage a wider mix of uses including some D1 (crèches, day nurseries, art and photographic galleries) and D2 (gyms, pilates studios, recreation).**

**A1 uses (shops and retail outlets) may become viable if a critical mass of more specialist businesses can be encouraged to locate in the area, with a focus around e.g. design, architecture, photography, crafts, music, film post production, music recording, and digital media. There are already some of the above uses in the area. Such uses would play into the councils wider ambitions to attract and retain creative industries. They are similar to those which the council hopes to encourage within the Kensal area, and the two neighbourhoods could become mutually reinforcing.**

In terms of built form, local residents are interested in the street reverting back towards a more 19th century version of mixed employment and residential use, with horizontal separation of uses on the same site (workshops, studios and creative industries on the ground floor, offices above, and residential above that).

This association and other local residents have fought very hard to keep the open skyline to the west of the Oxford Gardens/St Quintin CA, and to resist increased building heights along Latimer Road. But that battle looks to have been lost (comprehensively) in relation to the southern part of Latimer Road. The Imperial West development immediately across the railway embankment will involve building heights of 12-16 storeys and a 35 storey tower.

The area will have to adjust to this new reality, and it makes sense to start rethinking the long-term future western side of Latimer Road (currently made up of 3-4 storey office buildings at the southern end, and single storey industrial units in the central section). Increased building heights could be considered on the western section of the road backing on the Imperial West site (although increased heights would continue to be resisted elsewhere in the road).

**Separation of Freston Road and Latimer Road as two distinct zones**

**As discussed at the Enterprise Review workshop held on 21.11.12, we would argue strongly for the Latimer Road employment area to be separated from Freston Road in future revisions to the Local Plan.** The two areas have developed very differently in the decades since they were physically separated by Westway in the 1970s. They have different PTAL levels which have adversely affected employment levels in Latimer Road. They now need different forms of intervention and planning policy in order to achieve the council’s objective of ‘Fostering Vitality’.

We would question whether it is helpful to continue to designate Freston Road as an ‘Employment Zone’ given that employment uses feature only in sections of the street (mainly on the western side of the road) and with the remainder having remained as terraced housing. Some alternative label such as ‘mixed use area’ would reflect more accurately the present composition of uses.

**Comments on text of the consultation document**

**Para 1.3 and 1.4** we share the view that levels of home-based working in the borough are high and increasing, and suspect that the figures quoted are an under-estimate. Is the council able to capture data on the many residents who are registered with HMRC as self-employed and who work from home, but do not run a home-based business or company as such?

**Para 1.10** we share the Kensington Society view that ‘Cultural Placemaking’ is a term that means little to the public. It is not clear in what sense this concept is different from concentrations of creative industries and businesses. We share the council’s view that the borough’s future economic strengths lie very much in these fields, and that planning policies should build on this.

**Para 1.15 and 1.16** The evidence supplied by businesses and landlords with whom we are working in Latimer Road, and the evidence of our own eyes, does not suggest that *‘there is very little vacant property in the employment zones’.* Our shopping parades also suffer from high vacancy levels, and problems in attracting viable A1 uses.

**Para 1.17** This refers to the Imperial West ‘campus’ and could usefully also mention that the provision of subsidised high quality business units on this site will further threaten the commercial viability of Latimer Road. The proposed Helical Bar development in Wood Lane is also offering the prospect of subsidised retail units for the initial years after completion.

**Para 1.18 and 1.19** availability of broadband has for many years now made the concept of the ‘office’ redundant for many single-person professional service-providers or consultancies. Demand for the smaller end of office units in the Latimer Road area has dropped off as a result.

**Para 5.8** We notethe ominous reference to the fact that property agents have referred to *‘opportunities for further landmark buildings to be developed’* in the Freston Road/Latimer Road area. The term ‘landmark building’ has become routine developer/planner speak for very tall buildings, and is disingenuous. RBKC should be honest and clear in the vocabulary it uses. No doubt developers do see such opportunities, but as far as local residents are concerned we already have more than enough ‘landmarks’ and ‘wayfinders’ in the form of the Imperial West tower and the threatened Helical Bar tower

**Para 5.9** We are surprised that the survey for the Enterprise review found examples of a ‘sizeable minority’ of companies with concerns about having residential neighbours as a result of noise. The concern about resident’s cars blocking access is understandable, but can be relatively easily controlled.

**Responses to consultation questions**

In terms of the specific questions posed in the Enterprise Review consultation document, we have answered only those which we see as relevant to this part of the borough and to our initial thinking on a neighbourhood plan. Our comments do not relate to policies applicable to the main Town Centres or to other Employment Zones.

**Q1 Should the Council continue to protect premises and floorspace for business uses, or should the policy be more relaxed? Please explain your thinking.**

The association supports the broad principle behind Local Plan policy CF5, subject to it making clear in future that a policy of resistance to loss of small offices will not fly in the face of economic reality as demonstrated by hard evidence of longstanding office vacancy rates.

An amendment to Policy C5(a)i could for example include additional wording to offer some controlled flexibility on change of use, as shown in bold below:

***a****. protect very small and small offices (when either stand alone or as part of a larger business premises) throughout the Borough……*

*except where:*

***i****. the office is within an employment zone and is being replaced by a light industrial use, workshop or other use which directly supports the character and function of the zone****, including alternative uses reflected in a Supplementary Planning Document or Neighbourhood Plan for the area in question.***

**Q6: Are there any physical interventions like environmental improvements, refurbishment or re-development that would make the town centres more attractive to business?**

Insofar as this question relates to Employment Zones as well as Town Centres, environmental improvements can make a significant difference and are badly needed in the Latimer Road area. A neighbourhood forum and plan provides a potentially valuable means for ensuring that the trade-offs involved in negotiating such improvements as part of S106 agreements lead on to benefits that are genuinely valued by local people and have a real impact on the area. .

**Q8: What sort of places do we want our employment areas to be and what types of employers should we try to attract (i.e. should they be high-rent offices or low-rent activities)?**

Updated planning policies should be flexible and sufficiently sensitive to individual ‘place’ and neighbourhood to allow for both. There will always be a need and demand for low-rent activities, and a vibrant global city needs to find ways of accommodating these. For RBKC this requires robust policies to resist constant pressure for change of use to upmarket residential.

**We believe the best route to this goal to be a combination of well designed Core Strategy policies, sitting above area-based AAP/SDP or neighbourhood plan policies that commanding strong popular support.**

**Q10: Would it be desirable to introduce some mixed-use development (residential and employment uses in the same building) in our employment areas?**

Yes – as explained above we believe that this should happen and that where there is hard evidence of longstanding vacant employment floorspace, forms of alternative residential use should be considered.

**Q11: Are there any cultural facilities that would attract creative businesses, if so what are they?**

Through working at the very local or neighbourhood level, this may prove possible (e.g. art or photography galleries attract media studios, graphic designers).

**Q12: Would the employment areas work better with some associated facilities like restaurants and cafes?**

Yes, without these employment areas such as Latimer Road will continue to lose out to town centres. Even in a recession, many of London’s professional and creative employees can be discriminating about their work location and will give preference to areas that provide these and other facilities (pubs and bars to meet after work, conveniently located gyms, childcare options).

**Q13: Are there interventions that could make employment areas function better (e.g. a local business forum, neighbourhood plan or Business Improvement District)**

As set out in this response, we believe that a neighbourhood plan could have a significant impact on an area such as Latimer Road. We also believe that local businesses, landowners, and shop-keepers are ready and willing to make an input to the neighbourhood planning process.

**Q14: Are there any physical interventions, such as environments, refurbishment or redevelopment, that would make the employment areas more attractive to business?**

This is certainly the case for the Latimer Road area, as set out in the first section of this response.

**Q18: Are there any barriers to conducting business that could removed or lessened?**

Yes, the development of Borough-wide planning policies, for Local Plan purposes that are not so inflexible or ‘one size fits all’ that they prove in practice to inhibit or obstruct planning decisions at the spatial level of neighbourhoods.

**Q19: In future how should the Council engage with and act on the views of**

**businesses?**

It would help if the council could find better ways of capturing, storing and applying the evidence and data that businesses can provide, on the changing nature of the local economy. Change on the ground often outpaces a statutory planning framework that can react only slowly. Increased reliance on place-based SDPs/AAPs, coupled with encouragement of neighbourhood planning, could help to overcome this problem.

St Helens Residents Association

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