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Here are the comments from Business for London.

“Best use of land”. The concept of “making the best use of land”, is put forward as an overarching objective. This supersedes previous requirements to “maximise” or “optimise” the use of land, and is likely to cause plenty of debate about what constitutes the ‘best’ use of land. Given the state of the current property market, and the imperative to provide more housing, the inevitable pressure will tend to favour housing, at the expense of employment creating developments and existing employment areas.

“Design-led”. The plan advocates a ‘design-led’ approach to determine the scale, density and form of development. While design is a relevant consideration, the Plan should be clear that these design reviews should not override key land use, including workspace, policies and should not be overly cumbersome or delay development.

Balance between Housing and Economy. The Plan rightly gives a lot of attention to the provision of new housing, and especially affordable housing. However, it does not give the same detailed attention to the provision of employment space, and affordable work space. For example, GG 4 says the Plan will “identify and allocate” land for housing but GG5 is much vaguer, vis “plan for *sufficient* employment and industrial space...” Also tables 4.1 and 4.2 list specific targets for the number of houses to be built each year in each Borough but the nearest equivalent (Table 6.2) for industrial space limits itself to one of 3 non-specific options (limit release, or retain capacity or provide capacity).

Location of development and new infrastructure. The plan recognises the role of infrastructure projects as major catalysts for growth. The Plan identifies 9 more Opportunity Areas and gives appropriate weight to development in London’s many town centres. Many OAs overlap with Strategic Areas for Regeneration (those areas in greatest socio-economic need), which have the potential to promote inclusive growth to tackle social inequality and increase opportunities for Londoners. However, Table 6.1 expects almost 60% of office employment growth to take place in the CAZ/NIOD. Investment in transport infrastructure to the OAs, Areas of Regeneration and town centres should be prioritised to ensure that proportionately more development and jobs are located outside the CAZ/NIOD. London’s transport infrastructure is already stretched in getting people in and out of the CAZ/NIOD while many of London’s residents of deprived areas fail to gain access to the majority of jobs created in the CAZ/NIOD.

Town centres. Town centres' role is changing. Policies need to change to ensure they remain attractive places for residents and to a wider range of businesses, and not just retailing. The Plan introduces some interesting policies that should ensure that town centres continue to be at the centre of community life in London in the future. The focus on purely retail uses needs to be diminished to allow a wider range of businesses (including many more that are customer facing) to locate in town centres, especially in secondary and tertiary shopping streets.

Industrial land. The draft plan provides greater protection Industrial Locations (SIL and LSIL). Policy E4 seeks no net loss of industrial capacity across London. This is likely to prove difficult to implement on a site by site basis, particularly as Policy E7 facilitates the intensification and co-location of industrial land which could result in some land being lost to residential use. The amount of industrial floorspace will need to be retained through the more intensive use of sites, e.g. multi-storey warehouses. Such developments are currently quite limited and may well need positive intervention by the Mayor and others to show how this can be successfully realised.

Affordable workspace. E2 and E3 provide much needed support for the provision and protection of affordable workspace. Additionally E3 states that in mixed use schemes affordable workplaces should be operational before any residential elements are occupied. Achieving these policy objectives, while supported, will be extremely difficult to achieve in practice, due to the negative impact on the economics of commercial and residential developments. This will be especially difficult to achieve in more deprived areas, where such workspace is particularly valuable.

An effective and consistent definition of 'affordable' workspace is required. Different developers and different London Boroughs use varying definitions. In particular, the level of affordable rent should be set in the context of the rent levels being achieved in the immediate locality.

Creative Enterprise Zones. The introduction of CEZs is an interesting development. CEZs can enhance the local economy and provide facilities and workspace for the creative industries, one of London's key growth sectors. They have the potential to make a valuable contribution to the future of London in a similar way to Business Improvement Districts (BIDs). The Mayor should encourage the cross-fertilisation of ideas and good practice from BIDs to CEZs.

Workspace should be available to social enterprises, I cannot see any other specific support being encouraged in the London Plan to help them. Social enterprises are operating across most sectors and industries and play a significant role in most of the other areas of the plan ie Social Infrastructure, Green Infrastructure and Sustainable Infrastructure.

Inclusion of the further specific support of social enterprises in borough development plans, possibly in the recognition of social enterprise place status or support programmes would go some way to recognise the importance these enterprises have in ensuring an inclusive and fairer London.

The Funding Gap. The Plan recognises that there is a funding gap and will not be implemented without the need for more funding. There are also concerns that private sector investment will not be sufficient to achieve all of the Plan's policies. This needs to be addressed in the final London Plan as it needs to be robust and deliverable under a variety of different market conditions. Failure to make sure the Plan is deliverable will mean that London's World City status could be threatened.

Mike
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- North and East London: **Enterprise Enfield and London Business Partnership**
- Central London: **Centa**
- South London: **South East Enterprise and Start-up Croydon**
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We have achieved long-standing success through consistently and carefully working with the ever-changing needs of our clients. The membership is growing and each organisation has excellent links within its local community along with solid working relationships with local authorities, funding bodies and other support organisations in London.

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