

2 March 2018

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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By email only: londonplan@london.gov.uk

Dear Sir, Madam,

Consultation on the draft New London Plan

On behalf of Here East, I write in response to the consultation on the draft new London Plan (December 2017).

Here East is a legacy partner of the London Legacy Development Corporation (LLDC) on the Queen Elizabeth Olympic Park (QEOP) and is a major stakeholder which will play a prominent role in helping to shape the physical, economic and environmental future of the area.

Planning permission was granted for Here East, the redevelopment of the Olympic broadcast complex in March 2014, with construction commencing in late 2014 and the occupation beginning in April 2016. Since then, Here East has made great progress in letting space within the development and is now occupied by Loughborough University, University College London, Studio Wayne McGregor, Ford, BT Sport, Sports Interactive, Hobs Studio and Plexal – a new innovation centre supporting entrepreneurs and corporations alongside each other.

Here East welcomes the opportunity to provide comments on the draft new London Plan. These comments are provided below.

Site allocation – Here East

In the adopted London Plan (2016), Here East falls within the 'Hackney Wick (part)' 'Strategic Industrial Location (SIL) (Industrial Business Park (IBP)). This is considered to sufficiently reflect the uses and objectives of Here East.

The IBP aspect of the allocation has been omitted from the new draft London Plan, leaving just the SIL allocation.

The new draft London Plan describes SILs as being suitable for broad industrial-type activities, and lists the following uses:

- "1) light industrial (Use Class B1c)*
- 2) general industrial uses (Use Class B2)*
- 3) storage and logistics/distribution uses (Use Class B8)*
- 4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets*
- 5) flexible B1c/B2/B8 premises suitable for occupation by SMEs*

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6) small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés"

With the above definition in mind, Here East no longer consider the Hackney Wick SIL allocation as suitable for the uses and activities at Here East. Consideration should therefore be given to an alternative, employment allocation which will more accurately reflect the mix of uses and the objectives of Here East. Given that the detailed boundaries of SILs are determined by boroughs in their Development Plans, any changes here will need to be reflected in the forthcoming new LLDC Local Plan.

It is recognised that the draft London Plan introduces Creative Enterprise Zones (CEZ). These are a positive addition which support the role which creative industries have in contributing to London's economy and its cultural offer.

Here East provides workspace for a range of creative businesses which sit alongside office space for a mixture of start-ups and corporates. Here East also includes provision for managed and affordable workspace within this mix of uses. It may therefore be that a CEZ allocation is more appropriate for Here East than the SIL allocation in the draft new London Plan.

As a new designation, Here East reserves its position to continue discussions with LLDC PPDT and the Greater London Authority (GLA) regarding the objectives and role of the CEZ. These discussions would coincide with, and contribute to, LLDC's review of their Local Plan. Here East understands the intention of LLDC to develop a CEZ for Hackney Wick and Fish Island, which it provides in principle support for.

Proposed amendments / clarifications

The following table identifies relevant sections of the draft new London Plan and Here East's respective comments:

Draft New London Plan section	Comment / amendment
Policy E1: Offices	Here East supports the proposal of Stratford as a future potential reserve location for CAZ-type office functions. However, as a significant employer in the QEOP, Here East considers that mention should instead be given to Stratford and the QEOP.
Policy E2: Low-cost business space	Here East provides workspace for a range of creative businesses which sit alongside office space for a mixture of start-ups and corporates. Here East also includes provision for managed and affordable workspace within this mix of uses.
Policy E3: Affordable workspace	<p>Whilst Here East supports the general principle of providing Affordable Workspace, it considers that the policies should not overly constrain the development of new commercial premises by requiring the protection of low-cost space, or requiring the provision of affordable workspace where it adversely affects the viability of development.</p> <p>Here East considers that Policy E3 in its current draft form could result in unintended consequences for London's economy, such as putting at risk the existing market led regeneration of London, and complexity in how it is delivered.</p> <p>It also suggests that the policy should be subject to a minimum size threshold for practical purposes and an upper time limit for the duration of the planning obligation.</p>

Policy E5: Strategic Industrial Locations (SIL)	Here East does not reflect the new SIL definition, meaning its allocation should be amended to ensure it reflects the provision on site. Reference should be made to the removal of the IBP type of SIL allocation, and there should be a requirement that Local Planning Authorities review designations to ensure that they remain appropriate.
Policy E8: Sector growth opportunities and clusters	<p>Policy E8 relates very strongly to Here East, its sector and what it is working to achieve.</p> <p>Given the extent to which this policy relates to Here East, Here East considers that the policy would benefit from featuring Here East as a positive case study. This may be most suitable under the 'culture and creative industries' point of paragraph 6.8.3.</p>
Policy E10: Visitor infrastructure	Here East supports Policy E10's mention of the need to conserve, enhance and promote major clusters of visitor attractions. This is of relevance to Here East due to the proposed new presence of the V&A, which will also be in close proximity to the Stratford Waterfront site.
Policy SD2: Collaboration in the Wider South East	<p>Here East considers that Policy SD2 should further reference the importance of developing transport links given the inward commuting from the WSE.</p> <p>Here East also considers that Policy SD2 should reference the need and advantages for a stopping Eurostar service at Stratford International.</p>
Policy HC5: Supporting London's culture and creative industries	<p>Here East considers the CEZ allocation to be a more appropriate site allocation for Here East when compared to the existing Strategic Infrastructure Land designation.</p> <p>However, the role of CEZ allocations is not well defined and further information in how these will be delivered needs to be included within the Plan.</p> <p>Indeed, CEZs should not just be limited to supporting small companies and low cost business space – it is important that the opportunity for small businesses to work alongside large companies is also reflected. Policy HC5 needs to incorporate a recognition that creativity and innovation is truly achieved when there is a mix of companies at different scales, able to work together and collaborate.</p>

Summary

Following the publication of the new draft London Plan, Here East now considers the Hackney Wick SIL allocation as inappropriate for the uses and objectives of Here East. It is important that this and other employment site allocations are therefore reviewed to ensure that they remain appropriate, effective and consistent.

The creation of a new CEZ designation requires more detailed analysis and discussion with the GLA to assess opportunities and constraints of such an approach. In the case of Here East, this will be partly shaped by ongoing discussions with the LLDC.

Here East welcomes the opportunity to continue to engage with the Greater London Authority in producing a new London Plan, including a meeting to discuss the future allocation of Here East.

Yours faithfully,

Jeremy Castle
For Deloitte LLP

cc. Gavin Poole – Here East