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For and on behalf of
Owners and Tenants of Cygnus Business Park, Dalmeyer Rd, Willesden

DRAFT NEW LONDON PLAN

Response to the draft London Plan Consultation

**Cygnus Business Centre,
Dalmeyer Road, Willesden**

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London**

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by DLP Planning Ltd (DLP) on behalf of Solaria Architects Limited representing the owners and tenants of Cygnus Business Centre, Dalmeyer Road, Willesden in response to the Mayor's consultation on the draft new London Plan.
- 1.2 DLP, on behalf of its client welcomes the Mayor's decision to review and update the various elements of the London Plan to provide a comprehensive document that should fully reflect the policies of the National Planning Policy Framework (the Framework), based on the up-to-date, objectively assessed development needs of the Greater London Area in a balanced and sustainable manner as required by central policy.
- 1.3 The London Plan should, overall, be transparent and work symbiotically to provide direction to the Boroughs and for developers, to ensure the housing and employment needs of London is achieved. These representations seek to ensure that policies provide clear direction and support for the redevelopment of underutilised land, such as our clients, promoting appropriate regeneration to meet the needs of local communities.
- 1.4 Cygnus Business Centre is located within the Borough of Brent. It is considered to be an appropriate location for new development, falling within the Wembley Opportunity Area and a Strategic Area for Regeneration as identified by the London Plan; the site is also defined as a Locally Significant Industrial Site (LSIS). It also sits outside, but adjacent to the boundary of the Church End Growth Area; identified in the Brent Core Strategy (2010) as having the potential to provide a significant quantum of residential units in a variety of tenures, mix and sizes with the ability to also provide an equally large proportion of commercial floorspace.
- 1.5 Accordingly, our representations are particularly focused on our client's specific land interest and as such seek to improve the robustness and deliverability of the Plan as it relates to LSIS, particularly highlighting the inefficiencies of Policy E6 (Locally Significant Industrial Sites) and Policy E7 (Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

- 1.6 As demonstrated in these representations, we broadly support the Mayor's encouragement of the redevelopment and regeneration of appropriate areas to maximise the efficient use of land within Greater London. However, we feel that some policies, in their current form lack the flexibility to quickly adapt and respond to an uncertain and dynamic market, relying too heavily on a plan-led delivery of development.
- 1.7 We have also highlighted several policies which we consider provide context, especially as they relate to the need to increase the delivery of housing and which require further consideration to improve the transparency and deliverability of the Plan.

2.0 OVERVIEW

- 2.1 We welcome the Mayor's intention to keep the London Plan updated.
- 2.2 The Inspector who examined the London Plan adopted in March 2016 was concerned with the soundness of the strategy regarding meeting objectively assessed housing need (OAN) in full. He doubted the ability of the Boroughs to identify additional housing land and their ability to increase the density of development without significant, and adverse, socio-environmental impacts. As such he questioned the ability to reach provision of 49,000 dwellings per annum against the assessed land supply of 42,000 dpa. This led to his recommendation for an immediate review.
- 2.3 The Mayor has however subsequently asserted on several occasions that the Boroughs (including the City of London and the two development corporations) would be able to identify additional capacity and meet their own locally assessed OAN. However, to date this has not been the case and, largely, the Boroughs have not identified additional capacity to allow provision above the minimum housing targets.
- 2.4 So far, 19 Boroughs have produced Part 1 Local Plans but overall capacity has not increased significantly. Most Boroughs have only sought to meet the minimum London Plan target and delivery has also continued to lag behind the targets. There has been no impetus or obligation to take an innovative approach to housing provision.
- 2.5 The London Plan Annual Monitoring Report 2015/16 notes 38,553 net completions were achieved that year (including 4,564 non-conventional i.e. C2 use class bedrooms and homes) up from 31,384 the previous year. However, this still lags well behind what is needed and reflects a constrained provision given the strength of the housing market in both those monitoring periods.
- 2.6 One of our main concerns is therefore whether the draft London Plan and its higher OAN figure can deliver a significantly higher housing provision – without the need to look beyond the 'philosophy' of the Plan as mentioned by the last London Plan Inspector. We

see steps in the right direction but little which leads us to expect that ambitious targets can be delivered.

- 2.7 The new target is a 53% increase on the current London Plan and will need to be delivered within London's existing urban footprint given the constraints that the Plan is seeking to impose, such as on boundaries of the Green Belt. Whilst we strongly doubt that London can meet a figure of 65,000dpa year on year on its existing footprint commencing in effect from April 2019 (which would require planning permissions to be granted even before the Plan can be examined), in order to stand any reasonable prospect, it will be necessary to significantly rethink how land will be sourced for residential development.
- 2.8 We therefore support in principle the steps set out in the Plan to deliver a higher provision - a relaxation of density policy; the encouragement of mixed-uses; the encouragement of smaller sites - the ability of London to meet all its housing needs over the next ten years primarily through the redevelopment of existing developed land is questionable. It will only have any prospect of being achieved if the Plan makes much clearer that the priority lies with the use of land for housing as a priority; and if it provides a framework sufficient to encourage development to come forward which has reasonable chance of being approved.
- 2.9 We do not, in this regard consider that the policies that we highlight below, whilst welcomed in general, will go far enough in achieving the overall objective. In particular, the relationship between delivery and development plan policies needs to be clarified; and the London Plan needs to make clear that development that accords with its provisions should be supported even if contrary to the Boroughs' development plans as unless this is the case, the delays in further plan making will guarantee that the Mayor's ambitious housing targets cannot be achieved.
- 2.10 Accordingly, where there is a mismatch between the housing requirement and the ability of the Plan to secure delivery, the Plan must be considered *unsound* because it is unjustified and will be ineffective.

3.0 POLICY CONTEXT

3.1 Specific comments that we have on the context and introduction to the Plan are as follows.

Paragraph 0.0.2

3.2 The Mayor states that the draft London Plan will provide the development framework for London for the next 20-25 years, however, the housing targets apply only for the ten-year period 2019-29. We therefore question whether a London Plan that is said to provide a framework for the next 20-25 years can be adopted if the ability to deliver housing land is so uncertain.

3.3 In addition to questioning the ability to upscale delivery to the required 65,000 per annum from April 2019 we also wonder what status the Plan can have after 2029 and suggest that where its ability to determine the provision of housing land expires it must by default cease to be part of the development plan for London.

3.4 As the draft London Plan appears only to be a 10-year Plan, set out in the Plan. This would be consistent with the Government's draft guidance for its standardised assessment of the housing need, as set out in the *Planning for the Right Homes in the Right Places* consultation.

Paragraph 0.0.20

3.5 We do not agree or accept that the Mayor has a mandate to deviate from current national planning policy. We agree that national policy is not prescriptive, and that plan-makers may depart from it where there is good local evidence to justify doing so however in this instance, given London's impact on the rest of the South East, the failure fully to accord with national policy will have a significant adverse effect on the shire Counties surrounding London. Accordingly, we do not believe that departure from national policy is in the wider national public interest.

3.6 There are several aspects to this which are of particular concern:

- Calculating the objective assessment of housing need;
- housing land supply;

- the intention that the London Plan should obviate the need for the Boroughs to prepare their own core strategies – and therefore to test the London Plan’s assumptions;
- removal of the scope to challenge the definition of Green Belt boundaries as a means to deliver the development requirements; and
- A unilateral review of use classes.

3.7 As noted above, we do not believe that it is either appropriate or within the Mayor’s powers to adopt a different approach to national planning policy that is otherwise applicable across England and Wales in its entirety

3.8 National planning policy is intended to provide a consistent approach to planning delivery reflective of the election of national Government. Whilst not prescriptive and allowing plan-makers to depart from it in plan making or determining applications, it does provide an essential framework that all plan-makers should have careful regard to.

3.9 While we are aware that the London Plan is not a local plan – something the Mayor has variously stressed regarding the duty to cooperate – the NPPF was considered through previous London Plan examinations. We see no reason why this should not remain the correct approach given that the London Plan seeks to undertake certain key plan-making functions on behalf of the Boroughs. This includes the assessment of housing need and land supply as well as the need for Sustainability Appraisal.

3.10 We do not therefore accept that the Mayor can cherry pick the parts of national planning policy that are the most politically convenient. As such, the statement in paragraph 0.0.20 is unsound because it conflicts with national policy and established practice and *the scale of the Mayor’s election victory* is not in any circumstances an adequate ground to fail to adhere to the national consensus on planning.

3.11 Paragraph 0.0.20 should be deleted from the draft London Plan.

4.0 GENERAL POLICIES

4.1 Our comments on the Plans general policies are as follows.

Policy GG2: Making the best use of land

4.2 The London Plan should seek proactively to drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs in accordance with the third Core Planning Principle of the Framework. The express objective of the Framework is to “*boost significantly the supply of housing*” as clearly set out in Paragraph 3 and 47 of the Framework and now embedded in the National Planning Practice Guidance.

4.3 We welcome the Mayor’s support, in paragraphs 1.2.2, for development which makes the most efficient use of land, encouraging the co-location of different uses to create high density mixed use environments, including the redevelopment of brownfield sites and the intensification of existing uses.

4.4 In particular we strongly support the importance Policy GG2 places on the prioritisation of redevelopment and intensification opportunities on brownfield land and its ability to provide on-going support for London’s growth as espoused in GG2 A) and B). The importance of this is recognised in the Framework’s Core Planning Principles at paragraph 17 and reconfirmed at paragraph 111.

4.5 There is, however, no intrinsic connection in the Plan, even when read holistically, between Policy SD10 and Policy GG2(B) which indicates that the Boroughs should take positive action to ascertain the capacity for intensification of existing uses and especially to plan positively for mixed use redevelopment and regeneration of existing business areas which can both protect the local economy and deliver the housing needed.

4.6 Policy GG2 is therefore unsound as it is not positively prepared. It should be amended to state that:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development ~~must~~ should actively identify and bring forward plans to:

A. *[unchanged]*

~~B. Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach~~ Secure the intensification of land uses in sustainable locations by supporting proposals for the development of new homes and workspaces, redevelop existing areas where it can lead to the creation of mixed uses which will boost the housing stock whilst retaining job opportunities and through applying a design-led approach, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling.

Policy D6: Optimising housing density

4.7 In the spirit of Policy GG2 above, Policy D6 establishes that development proposals should be designed to achieve the optimum density, making the most efficient use of land as appropriate to the site, its accessibility and the capacity of surrounding infrastructure.

4.8 We agree with the objectives of this policy, recognising that growth needs to be accommodated in an efficient and inclusive manner, ensuring housing density is optimised through appropriate redevelopment and design; this is in keeping with the Government's imperative of boosting housing supply as per the fifth bullet point of paragraph 47 of the Framework which encourages Authorities to set their own approach to housing density to reflect local circumstances.

Policy H1: Increasing Housing Supply

4.9 Whilst our view is that the Mayor of London should not restrict the Boroughs only to preparing 'delivery-focused development plans'; i.e. that they are not required to publish

Part 1 strategies, we support the policy insofar as the Boroughs should positively prepare development plans which actively seek to deliver on the objectives of Policy GG2(B) as discussed elsewhere in these representations.

4.10 However, if the Mayor is to achieve the implied necessary step-change in delivery from as early as April 2019, (bearing in mind the progress made by Boroughs with plans based on the current London Plan) it will be necessary to base planning decisions on this London Plan rather than withhold permission for applications based on the expectation that development shall only be brought forward in accordance with local plans.

4.11 We consider that Boroughs should positively encourage mixed use housing redevelopment and intensification on low density sites in commercial, retail and industrial use in order to deliver the level of housing needed.

4.12 In order to render the Plan justified and effective in the delivery of the growth targets, Policy H1 part B should be amended as per the below, with the inclusion of an additional part G:

B. To ensure that ten-year housing targets are achieved:

1) The granting of permission for development which increases the housing supply and which meets the policies of the London Plan

G. The need for an immediate review of the London Plan triggered by a) failure to meet the target of 65,000dpa in 2019; and b) failure of the trajectories to demonstrate an adequate, deliverable supply of housing land up to 2028 to sustain delivery of 65,000 homes annually.

Policy DF1: Delivery of the Plan and Planning Obligations

4.13 Part A of this policy states that applicants should account for development plan policies when bringing forward proposals for development and that site specific viability testing should be the exception rather than the norm. This is contrary to national policy. The

Framework is clear that planning obligations should be used where they make a development acceptable and not as a means to delay or frustrate it - paragraph 205. Decision-takers are encouraged to approach decision-taking in a positive way at paragraph 186.

- 4.14 This is also reflected in the NPPG at paragraph 006 (Ref ID: 23b-006-20140306) which states that local planning authorities should be flexible in their planning obligations requirements. While we appreciate the theory that land-owners and developers should factor-in the cost of development plans policies national policy is not that decision-takers should adopt by default a stance of inflexibility when determining planning applications.
- 4.15 Whilst *Planning for the Right Homes in the Right Places* has identified this as a potential policy approach it is not appropriate for the Mayor to anticipate national policy or predicate this Plan on his expectation of national policy which may not be applied.
- 4.16 The London Plan and Local Plans should be supported by viability assessments. These can only ever provide a very general view of what might be viable over the plan period. In the case of the draft London Plan this is a 22-year period which covers a very large area with necessarily wide differences occurring or likely to occur by location and time. The *London Plan Viability Study*, December 2017, recognises this, concluding at paragraph 14.3.1 that the diversity of the London market means that viability varies across the City.
- 4.17 To achieve the Mayor's housing targets will require greater not less flexibility, otherwise the Plan risks being wholly self-defeating.
- 4.18 Part A of this policy is therefore unsound because it is contrary to national policy and should therefore be re-worded to read:

A. Applicants should take account of development plan policies when developing proposals and acquiring land. While the priority for planning obligations is affordable housing and contributions to necessary public transport improvements, Boroughs will need to be flexible in the pursuit to other policy objectives and have careful

regard to the viability of schemes especially to ensure that housing targets are achieved.

5.0 PLACE SPECIFIC POLICIES

5.1 The draft London Plan continues to provide a strategic framework for those parts of London where significant development is expected. Those place specific policies, as relevant to our client's land are reviewed in turn below.

Policy SD1: Opportunity areas

5.2 We support the use of this policy to identify areas that have the potential to deliver new homes and employment opportunities; particularly in the Wembley area. The Plan should positively encourage and endorse the delivery of these areas to ensure they realise their full potential, making the best use of land to meet the growing needs of London.

5.3 We agree that development plans and decisions should support development which creates opportunities for new housing and employment; particularly supporting developments that intensify and make better use of Locally Significant Industrial Sites (LSIS).

5.4 Nevertheless, the anticipated housing contribution from the Opportunity Areas (OAs) should not be overestimated. It is only within the Inner London Boroughs where the scope to maintain floorspace but reduce building footprints and reduce yard areas is likely to be achievable to the extent envisaged in Figure 6.3.

5.5 The Mayor's expectations regarding this source of supply should not therefore be overstated, however the corollary of this is that where such opportunities arise to make a meaningful contribution to creating genuine mixed uses this should not be suppressed by restrictive policies that seek to retain employment as an overriding priority.

Policy SD10: Strategic and local regeneration

5.6 In principle we support Policy SD10 in relation to the identification of Strategic Areas for Regeneration within the draft London Plan. The wording of Policy SD10 however currently lacks the necessary emphasis on the deliverability, monitoring and review of

these areas to ensure that development of an appropriate nature and especially scale actually comes forward within the plan period.

- 5.7 We are concerned that scant detail is provided regarding the purpose and form of the Strategic and Local Areas of Regeneration and that no mention is made of the relationship with the Plan's albeit extremely limited proposals for estate regeneration in Policy H10. Given that most of these areas will include housing estates this would appear to be a major weakness with the London Plan. It is hard to ascertain to what extent these areas have been assumed by the Mayor to contribute to the housing land supply.
- 5.8 Moreover, with regard to the Church End Regeneration Area there is nothing in the Plan which sets out a mechanism under which regeneration can actually be assured or effective.
- 5.9 Therefore, it is hard to ascertain to what extent these areas have been assumed by the Mayor to contribute to the housing land supply and the London Plan should set out which areas are expected to contribute to meeting the housing targets.
- 5.10 A prime example of the potential ineffectiveness of this policy is demonstrated by policies in the current development plan for Brent relating to the Church End Growth Area. This growth area was established within Policy CP10 of the Core Strategy, adopted in July 2010. Since the time of its designation however, this growth area has consistently underperformed (according to the Council's Annual Monitoring Report) and will not achieve the desired outcome in terms of housing.
- 5.11 In this instance, land comprising the Cygnus Business Park at Dalmeyer Road, falls between the edge of the Church End Growth Area and existing residential development to the east. It currently comprising an area of established Class B1 uses principally used for B1(a) and B1(c) purposes. Our clients consider that the site is capable of redevelopment to provide mixed uses, retaining and enhancing employment accommodation on the premises to suit current users and current market needs whilst facilitating the conversion/redevelopment of parts of the site to provide much needed residential accommodation (including affordable housing).

5.12 The site is well located, deliverable and available for such redevelopment. As such it represents a logical extension to the Church End Growth Area and provides an opportunity to deliver additional residential development, assisting Brent in delivering its regeneration objectives and contributing towards the Mayor's housing targets in an appropriate location whilst retaining jobs and improving the quality of the present employment offer.

5.13 In light of the above and the national imperative to boost the supply of housing, it is suggested that the following wording be included within Policy SD10 to ensure Strategic and Local Growth Areas are achievable and deliverable; ingrained with the flexibility to meet the shifting needs of a growing community. Part H of this policy should be updated to reflect the below:

H. Boroughs, through Development Plans and decisions, should:

- 1) *identify Strategic Areas for Regeneration (see Figure 2.19) ~~in Local Plans~~ based on a thorough understanding of the area and the demographics of communities and their needs*
- 2) *seek to identify Local Areas for Regeneration taking into account local circumstances*
- 3) *Clearly set out the deliverable housing, employment and community objectives of each Strategic or Local Area of Regeneration, encouraging mixed use developments that make the most efficient use of land*
- 4) *Establish how they will encourage and deliver the growth potential of these areas*
- 5) *Monitor and review the progress of each Strategic or Local Area of Regeneration to ensure they are meeting their established targets, taking action where necessary to overcome any barriers, including reviews of designation boundaries (and associated policies) and the encouragement of*

other appropriate windfall sites not identified in the Development Plan (in line with Policy H1 Increasing housing supply).

- 5.14 Regeneration proposals at both a strategic and local scale provide an opportunity to re-think how land and buildings are used, leading to a more efficient use of land which can, if delivered appropriately, assist Boroughs in achieving high quality development whilst meeting the Mayor's housing and employment targets. The current wording of his policy is unsound because it is ineffective, suggested changes in line with the above would help ensure the effectiveness and deliverability of the Plan.

Policy E4: Land for industry, logistics and services to support London's economic function

- 5.15 Whilst we support the high-level objectives of this Policy and recognise the importance of ensuring a sufficient supply of industrial land is retained within the Greater London Area, it is considered that alternative sources of industrial land should be identified in the Plan, with priority given to meeting the substantial housing need and maximising the opportunity presented by the scope for redevelopment of existing, less effectively used employment areas.
- 5.16 Our concerns relate to the impact of the proposed employment policies on the future supply of land for residential development. This is primarily a consequence of the aim of no net loss of industrial floorspace capacity in the SIL and the LSIS (paragraph 6.4.3 refers to the volume of the land in these categories). While we understand concern about the rate at which industrial land has been lost in the past (primarily to residential) as described at paragraph 6.4.4, the fact is that if this supply is now to be significantly reduced at a time when housing supply needs to double, then alternative sources of land must be identified by the draft London Plan.
- 5.17 Furthermore, given the growth in demand for commercial floorspace, and in particular logistics, it is in our view, very unlikely that opportunities for mixed use will come forward on anything like the scale envisaged in the Plan. Indeed, the logistics sector is

increasingly looking at multi storey provision on its existing sites in order to accommodate demand arising from the absence of new sites.

- 5.18 In relation to the proposed policy wording, we question the robustness of the current provisions, which only allow for the release of industrial land to manage issues of long term vacancy. This wording is overly restrictive and does not consider the varying market or locational circumstances/pressures which may necessitate the redevelopment of an industrial site (for example if an existing industrial site becomes an undesirable/unsuitable location for industry due to local redevelopment or regeneration).
- 5.19 It is, in terms contrary to Framework paragraph 22 which requires that employment land does not continue to be protected where there is no reasonable prospect of it being used for such purpose.
- 5.20 The policy, in its current state, is unsound as it is ineffective and contrary to national policy. To address these concerns, additional flexibility should be introduced into part C of the policy by way of the following amendments:

C. The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land ~~in order to manage issues of long term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure,~~ should be facilitated through the processes of industrial intensification, colocation and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

Policy E6: Locally significant industrial sites

- 5.21 Whilst we broadly agree that Locally Significant Industrial Sites (LSIS) be identified within the development plan, we contend that such designations are often wrongly applied to

other employment or sui generis uses or underperforming industrial areas with the policy being overly restrictive, hampering re-development proposals which may make a better and more efficient use of land and counter to the objective of encouraging mixed uses.

5.22 We appreciate the importance of safeguarding Locally Significant Industrial Sites (LSIS) in London. We have no doubt that such sites are coming under increasing pressure for re-development for residential use. However, it is clear that some of the Boroughs have allowed LSIS sites for residential development – as set out at paragraph 2.57 of the SHLAA 2017 – albeit it is unclear how many LSIS sites have been exempted as the SHLAA does not provide this detail.

5.23 We consider that the question of whether an LSIS site should be allocated for redevelopment (mixed use where feasible or for pure residential) is properly a matter for the local authority in question and they should be able to explore this question through a local plan. As local designations it is more appropriate that decisions over the future of such sites should be made by the Boroughs.

5.24 Policy E6 should therefore encourage the Boroughs to consider the necessity of retaining individual LSIS and should encourage them to consider whether the objectives of the London Plan would be better served by either full or partial redevelopment for housing where the latter enables employment to be retained but making more efficient use of the land. The Boroughs should be allowed discretion to decide whether it is appropriate for these sites to be kept as industrial sites.

The current wording of this policy is unsound as it is ineffective. To ensure these LSIS designations remain up-to-date and reflective of the changing market it is recommended that an additional clause be added to this policy. We suggest that Policy E6 is re-drafted to include a new clause at the beginning (Part A 1) and at the End (Part A 4 and 5) that reads:

A. ~~In their Development Plans,~~ Through their development plans, Boroughs should:

- 1) explore as part of their assessment of their housing and employment land supply needs whether LSIS sites should still be retained for industry. This judgement should be based on local considerations including the demand for such sites for employment, the context of the site, the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) and the contribution that housing would make to local need;
- 2) *define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function)*
- 3) *make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and the co-location of residential and other uses (and distinguish these from local employment areas that can accommodate a wider range of business uses.*
- 4) Monitor and review the appropriateness of these boundaries and associated policy to ensure land remains in its most efficient use and reflects changing market signals.
- 5) In the absence of an up-to-date development plan, permission should be granted for appropriate mixed-use re-development which meets the policies of the London Plan and increases the housing supply.

Policy E7: Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

5.25 We support the objectives of this policy and its endorsement of the proactive identification and encouragement of the intensification of uses; particularly where

development supports the growing need for residential and other uses such as social infrastructure. We do however question the:

- a. application of this policy to sites outside of use class B1(c), B2 and B8 but within LSIS designations;
- b. reliance on plan-led LSIS intensification and co-location;
- c. effectiveness of this policy in securing intensification on LSIS.

5.26 Part C of Policy E7 relates to intensification and/or co-location with residential and other uses in designated LSIS. As highlighted at para 3.11 above, LSIS designations often contain a variety of uses outside of the B1(c), B2 and B8 uses such as B1(a) and (b), Class A and sui generis uses. This policy needs to be reflective of the diverse nature of these areas, providing greater clarity as to how this policy applies to uses outside of B1(c), B2 and B8, ensuring it does not unduly inhibit the development potential or intensification of these sites.

5.27 The wording of part C of this policy is exceptionally prohibitive, discouraging and restricting proactive developers and inhibiting potential growth and intensification opportunities within LSIS. To make the most efficient use of this land through the intensification and co-location of uses, this policy needs to acknowledge and support appropriate development-led projects, which are often faster to respond to market signals and changes. Considering the above, it is suggested that an alternative approach be applied, encouraging developers to optimise the use of industrial land, through the preparation of appropriate masterplans and design codes (in line with Policy D2: Delivering good design) demonstrating the appropriateness of the site and its compliance with part E of the policy.

5.28 The policy in its current form is unsound because it is ineffective. To address this and the concerns raised above, the following alterations are suggested in respects to part C of Policy E7:

- C. *Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and co-located uses (outside of B1(c), B2 and B8) in selected parts of LSIS could be intensified and/or co-located with residential*

and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. Boroughs, through their Development Plan, should ensure that proposals for industrial intensification and/or co-location, be accompanied by a masterplan and design code, clearly demonstrating compliance with part E below and integration with the existing community. Alternatively, such sites may be ~~This approach should only be considered as part of plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.~~

5.29 We also question the appropriateness of using floorspace as the sole measure of intensification in the context of mixed use industrial redevelopment. As stated in paragraph 1.2.1 of the draft Plan, employment in London is expected to increase on average by 49,000 jobs each year, with a projected growth of 6.9 million jobs by 2041; requiring economic diversification and the most efficient use of land. Given the above, and the Mayor's imperative to meet these employment requirements, it is recommended that part E this be altered to take into account the existing and potential employment capacity or such sites.

E. The processes set out in Parts B, C and D above must ensure that:

- 1) *the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of employment capacity industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing. Where this cannot justifiably be provided, it must be demonstrated that the re-development will result in a cumulative uplift of employee capacity on the site.*

5.30 As is the case at our client's land at Cygnus Business Park any potential redevelopment and co-location of residential, industrial and commercial elements is unlikely to be able to achieve a net increase in industrial floorspace. It does however present the opportunity to optimise employment growth (in terms of job numbers), whilst retaining B1(a) and B1(c) uses and contributing towards housing needs of Brent and the Greater

London Area. The scope for redevelopment of this site is therefore, on balance, considered to make a significantly more efficient use of land, as compared to its current use.

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