

Dear Sir / Madam

Please see the initial representations below to key Policies E5 and H6 submitted on behalf of clients of Shaw Corporation Limited. We reserve the right to submit further comments on additional policies at latter stages of consultation and appear at EiP.

- **Policy E5 Strategic Industrial Locations (SIL)** – We support the approach to SIL set out in part D of Policy E5, which allows for the strategically coordinated process of SIL consolidation through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough. Notably, we support the consolidation of SIL at Old Kent Road to facilitate the regeneration of the Old Kent Road as set out in the emerging Old Kent Road Area Action Plan.
- **Policy H6 Threshold approach to applications** – Draft Policy H6 states that the threshold level of affordable housing is initially set at 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses. We do not consider a higher threshold of 50% to be appropriate in these circumstances, as it does not automatically follow that land values will be significantly increased because of a change of use to, or introduction of residential uses, particularly where part of mixed use schemes that retain employment.
- Supporting text should clarify that Policy H6 does not require developments on Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release to achieve 50% affordable housing, but rather a viability assessment will be required if the application does not propose 50% affordable housing.
- Referring to paragraph 4.6.12, we do not consider that “late stage” reviews are required for all schemes where an early stage review has not been triggered – as per representations to the Viability SPG, we maintain that **if construction has commenced within a set period following grant of planning permission, there should not normally be a requirement for a near end review**. This will have the effect of incentivising the early delivery of developments where the affordable housing viability has only recently been agreed.

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