

Tate and Lyle Sugars comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

We welcome the draft London Plan as going a long way to deal with some of the difficult land use issues that we have faced as a London manufacturing business in recent years. In particular, we are pleased that the Plan recognises the importance of Strategic Industrial Land (SIL) to the economy of London and strikes a better balance than existing policy between the interests of good quality jobs and the economy relative to the need for London to build more safe, affordable homes. Both are important objectives that need to be balanced.

Our recent experience with how the planning system handles residential development in an industrial area has been eye-opening. We think it is indicative of the challenges many other businesses face and feel we can provide some learnings and recommendations to feed in to policy. The starkest lesson has been the extent to which business is at a disadvantage relative to property developers. The planning process is expensive, complex, does not mandate proper consultation with industrial neighbours and is perceived not to protect SIL. These challenges need to be addressed to ensure industrial use can happily co-exist alongside the equally important objective of more, better quality and affordable homes for Londoners.

We have made three key recommendations on this issue, which we are pleased to see reflected in the draft Plan. These are:

Firstly, a clear policy signal should be given that SIL is not automatically available for conversion to residential use at any cost. This would help stop the speculative trap that developers get themselves in to of purchasing industrial land at high prices and then being forced in to conflict in order to develop the residential scheme at any cost and recoup their investment.

Secondly, at a minimum, a formal test should be established to verify the assertion from developers that there is no further use for SIL or LSIS land that they wish to develop. At the moment this assertion seems to be made and accepted at face value with little or no testing.

Thirdly, neighbouring industrial users should be part of the planning process right from the start. This should include the pre-planning process, Design Review Panels and the GLA prior to Stage 1 reports. The present system seems to allow developers to go through pre-planning, the Design Review Panel process, and get GLA feedback, before any serious discussion with industrial neighbours has even happened. By this point developers are heavily committed to their plans. Good planning policy should require distance, layout and mitigation to be used in that order to enable co-existence with industrial neighbours. By ignoring industrial neighbours until late in the process only a very limited number of mitigation measures are left to use when it becomes clear that conflict exists.

Please find more detailed comments on the specific policies and sections of draft Plan at the appropriate pages. We remain at your disposal to help in any way that we can with this important policy.

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Section: [N/A](#)

2.1.46 – 5: Royal Docks Opportunity Area Framework

- We broadly support this section. The Royal Docks provides fantastic opportunities to grow businesses and jobs. As members of the Royal Docks Enterprise Zone Advisory Board we think it is essential planning policy directly supports the aim of attracting a wide range of new businesses to the area.
- The draft Royal Docks & Beckton Opportunity Area Framework issued in 2016 by the GLA caused confusion and complications in the area for pre-existing businesses, property developers and local Government. Meticulous and detailed consultation should take place before the final version to ensure the spatial planning matches the reality on the ground

Page: [Thames Estuary](#)

Section: [2.1.48](#)

- The policy rightly recognises “the presence of important existing industry” and we strongly support the statement “The area has significant areas of SIL and recent evidence confirms that there is a continued demand for industrial space in the east of London. The Planning Framework should ensure industrial capacity is managed in ways that reduce overall vacancy rates and support the intensification of industrial, logistics and commercial uses so that they continue to form part of the overall mix of uses in the area.”
- There is significant demand for SIL land in this area and active industrial buyers.

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Section: [2.1.49](#)

- Point 2.1.49 states “The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity.”
- Within Thameside West there remain extremely important and economically vibrant areas of SIL. The proper and thorough protection of these areas, in the context of limited SIL release, is crucial both crucial to maintaining and creating jobs as well other objectives mentioned in the London Plan such as Wharf Consolidation. Given this we suggest the plan should possibly be amended as below. Amends in **bold**
- "The Planning Framework should also set out how to **carefully** manage **retaining important pre-existing industry** alongside the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity."

- We strongly support the principles contained within this policy. It is essential to safeguarding jobs and longstanding businesses, particularly those of an industrial nature. These are often particularly noisy sites that operate 24/7 and therefore prone to conflicts with residents in nearby, newly built buildings. Thorough and proper application of this policy will go a long way to preventing that.

Comments & Suggested Amendments

- It is extremely important this policy is given due prominence by the GLA in current and future discussions with developers as well as any communications activity around the plan – too often similar principles have theoretically applied (e.g. previous London Plan Policy) but are not given due weight in the planning process without extensive representations by the affected industrial business.
- We would suggest adding the following text (in **bold** below) as an additional 1st point to point D12.C
- **Distance from industrial-type activities should be the primary design mitigation principle. It should be the fundamental design measure upon which other mitigations build upon when separating new noise sensitive development from pre-existing businesses**
- We would also suggest the following text (in **bold** below) is added to provide clarity
- **“Agent of Change principles are likely to mean any residential development adjacent to SILs will necessarily be less intensive than elsewhere, in order to allow for appropriate distance and mitigation from industrial activity.”**

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [E4](#)

- We strongly support the principle of “no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.”
- It is essential to safeguarding jobs and longstanding businesses, particularly those of an industrial nature.
- It is extremely important this policy is given due prominence by the GLA in current and future discussions with developers as well as any communications activity around the plan

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [E7](#)

- Overall this section is extremely complex and verbose – a rewrite (and the possibly a re-consultation) should be considered to improve its clarity. The intentions of the policy in certain places are unclear.
- We have no opposition to using SIL more intensively. However we are sceptical that much SIL can be sacrificed for residential uses for through the process of intensification.
- We are concerned policy E7 could be interpreted as maintaining incentives for property speculators to continue to purchase SIL land in the hope of eventual residential development. We believe that the London Plan should seek to regularise the SIL market and remove “hope value” from it.

- The tests for “no reasonable prospect” are an excellent addition. However we would suggest that bullet 2 of 6.7.4 is strengthened as follows (amends in **bold**) “the site should have been marketed with appropriate lease terms **at locally benchmarked industrial market rents**, and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users”

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [E5](#)

- We strongly support the principle of “no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS.”
- We very strongly support policy E5.5

Comments & Suggested Amendments

- However we think E.5.5 could be improved by emphasising the importance of distance as the primary design mitigation principle followed by others listed below
- Therefore we would suggest the following amend (amend in **bold**) “Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities are not compromised or curtailed. **Distance from industrial-type activities should be the primary design mitigation principle. Following this** particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.”
- It should be made clear that any residential development adjacent to SILs will necessarily be less intensive than elsewhere, in order to allow for appropriate distance and mitigation.