



Hello London Plan people. Please accept the following:

New Draft London Plan

Comments from Vital OKR

2nd March 2018

We wish to take part in the Examination in Public.

We would welcome the opportunity to submit further explanation and evidence to expand on these comments, and to enter into dialogue about these comments.

Vital OKR is an association, with somewhat over 300 members, that has emerged over the past couple of years to give a stronger voice to the businesses in the Old Kent Road area of Southwark. In our chunk of that borough there is a diverse economy driven forward by close to 1,000 businesses who provide work for around 10,000 people. We have strong industrial enterprises, most of them focused on serving inner and central London's just-in-time supply, servicing and production needs, we have a fast expanding cluster of creative enterprises, niche and craft producers, many builders merchants, vehicle repair and hire garages, diverse retail, several thriving high street settings and a dynamic faith community.

Notable amongst the challenges facing the economic life of our area is the constricting supply of suitable accommodation. While our enterprises are vital, there is not enough space for them to grow, and for others to be welcomed. The problem has become worse since the relevant local planning authority signalled potential for large scale residential focused redevelopment right across the area, and has commenced a process of intense dialogue with larger land owners and potential developers, already resulting in 6 major policy violating planning applications. Alongside this process has come intense land trading, much uncertainty, rent escalations, and plummeting lease lengths. We fear the expulsion of hundreds of our businesses and the loss of several thousand jobs.

The London Plan can help to secure a good future for the Old Kent Road, and for many other equivalent parts of London. We need the London Plan to recognise the accommodation requirements of London's economic and civic

life, and to steer boroughs towards understanding and providing for those requirements, to focus on achieving welcome and avoiding expulsion. We also need the London Plan to promote a fair, inclusive and dialogue rich exercise of the planning system. Our comments focus on these broad matters, together with comments on the sections of the London Plan that offer guidance on the Old Kent Road Opportunity Area and the adjoining New Cross / Lewisham / Catford Opportunity Area.

I am Mark Brearley, member of Vital OKR, proprietor of Kaymet (a manufacturer of trays and trolleys since 1947 whose factory is located within the OKR Opportunity Area), professor of urbanism at the Cass, London Metropolitan University, and former Head of Design for London at the GLA.

Comments as follows:

Chapter 1, Planning London's Future (Good Growth Policies)

We suggest addition of an additional Good Growth policy encouraging fair, open and democratic process. We believe that this would support the spirit of the plan and resolve a significant deficiency. Reference, for example, to the application of public sector equalities duties, and Gunning Principles, to the planning system, would be helpful, arguably essential.

para 1.1.5 should be reviewed as currently it gives the impression that engagement with local people is a nice-to-have, rather than an obligation. Local people could be better defined, making clear that this includes all those who sustain local economic and civic life, and all parties who are potentially affected by change.

Policy GG1 regarding building strong and inclusive communities could helpfully have wording added to point A to clarify that the scope of this policy includes ensuring that there is sufficient and suitable accommodation available in the right places, and to point C to require that those involved in planning and development Promoted, protect and plan for crucial role town centres have (thus recognising that loss of high street setting accommodation for which there is a need should be guarded against).

An additional GG policy, perhaps part G of Policy GG1, should give policy status to the requirements mentioned in para 1.1.5, about engagement and consultation. Policy could describe a requirement to **plan collaboratively, to follow legal obligations** (Gunning, equalities duties, etc), **to seek to ameliorate democratic deficiencies in relation to the planning system** (most notably the resident focus and lack of voice for businesses), **and to be open, to consult, to sustain a strong knowledge / evidence base, and to refrain from taking ad-hoc planning decisions in violation of planning policy and thus by-pass proper scrutiny and undermine fairness.**

We challenge para 1.2.6 regarding the Mayor's Good Growth by Design programme as it seems to endorse an increase in behind-closed-doors pre-application and during plan formation discussions, and further exclusion of the public / potentially affected parties. This is not inclusive nor fair and is not compatible with such as para 1.1.5 and 2.0.7.

Policy GG2 regarding making the best use of land could usefully have its point C re-drafted to make clear that its scope goes wider than built fabric, that it also includes aspects of economic and civic life. We suggest amendments as follows, or similar (grey is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

C

Understand what is **already present and** valued about existing places, **both built fabric and activities, including economic and civic life**, and use this as a catalyst for growth and place-~~shaping~~ **making**, strengthening London's distinct and varied character **and its capacity to welcome.**

Linking to this, we suggest the following paragraph text amendment:

Para 1.2.7

London's distinctive character and heritage, **and its diverse economic and civic life**, is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, **and the activities that take place on land and buildings**, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

Policy GG5 regarding growing a good economy could usefully be tweaked and added to in order to emphasise the requirement for engagement and dialogue, and to broaden the call to plan for sufficiency of accommodation for the economy to include high street settings, including the urgent priority of extending town centre designation to cover all high streets and the use of town centre policy to manage the supply of space. We suggest a new point to Policy GG5, perhaps point F, that could describe a requirement to **plan for sufficient and diverse accommodation in high street settings to support growth, through inclusive designation of the town centre network and secure appropriate development within it.**

Chapter 2, Spatial Development Patterns

In the paragraph about the CAZ and town centres it should be made clearer that these settings have a primary civic role, complementing their commercial role, and that the housing growth that it is right to promote must not happen at the expense of the accommodation required by vibrant economic and civic life. We suggest amendments as follows, or similar (great is existing text, red indicates suggested additional text):

para 2.0.6

London's Central Activities Zone (CAZ) and town centres are the primary locations for commercial **and civic** activity in the capital. These are complex parts of London, with a wide mix of uses and unique local character. The CAZ and the town centre network have a crucial role to play in supporting London's growth, and the London Plan sets out how this growth should be managed and planned for. Many town centres and the surrounding areas have potential to accommodate significant quantities of new housing, making the most of walking, cycling and public transport connectivity and complementing their commercial **and civic** role, **while ensuring that diverse non-residential accommodation needs are met.**

Our comments on para 2.0.6 relate to our comments about Policy GG5 regarding growing a good economy, and Policy SD6 regarding town centres, see later.

In paragraph 2.0.7 regarding the benefits of growth and change it should be made clearer that the wrong sort of growth can damage business communities, not just residential communities, and that all localities have many communities who should be worked with. We suggest amendments as follows, or similar (great is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

para 2.0.7

Growth and change have not always benefited Londoners equally. In some cases, the wrong sort of growth has led to established communities **and businesses** finding themselves priced out of the area they call home. Some parts of the city have not benefited from the advantages the growth of London provides, with too many areas in London still experiencing deprivation despite the wider success of the capital. To address this, it is important that there is a strong focus on sustainable and inclusive regeneration in these areas, with boroughs, the Mayor and other partners working closely with ~~the all~~ local **communities community** to bring about the right sort of change and investment. Where significant development is planned in these areas, it is crucial that it benefits local communities, provides employment and genuinely affordable housing, and is properly integrated into the area.

Policy SD1 regarding Opportunity Areas could have a useful additional emphasis in section A point 1 by mentioning **inclusive and** collaborative preparation and implementation of planning frameworks.

Policy SD1 section A point 5 could be adjusted to make clear that the scope includes economic life, so it could read: Ensure that Opportunity Areas maximise the delivery of affordable housing, ~~and~~ create mixed and inclusive communities, **and can welcome a vibrant and diverse economy**. Likewise point 7 could be amended to read: Monitor progress in delivering homes, **accommodation for the economy**, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery.

Policy SD1 section B point 5 could be refined to make clear that the requirement for sufficient industrial accommodation is not confined to current industrial land, rather it is about total capacity and the meeting of needs. We suggest amendments as follows, or similar (grey is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

5)
Support and sustain Strategic Industrial Locations (SIL) and other industrial capacity, ~~by considering and~~ **consider** opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), 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. **Plan for new industrial accommodation, in areas beyond current industrial land, including in mixed-use developments, where there is need.**

Policy SD1 section B point 5 could be added to, making clear the scope of required consultation and that processes should include all in dialogue:

9)
Ensure planning frameworks, **masterplans and major development proposals** are subject to public and stakeholder consultation, **and are prepared through a process that includes dialogue with potentially affected parties.**

On the same tack, regarding growth corridors and opportunity areas, the process for OAPF preparation could be steered with greater clarity towards fairness by addition to para 2.1.4. We suggest addition as follows, or similar (grey is existing text, red indicates suggested additional text):

para 2.1.4
Opportunity Area Planning Frameworks (OAPFs) can represent the first stage in a plan-led approach to providing significant quantities of additional jobs and homes, improvements to transport and other infrastructure, and better access to local services. The Mayor recognises that there are different models for taking these forward depending on the circumstances and development needs of each Opportunity Area, and for translating these frameworks into policy in Development Plan documents and Supplementary Planning Documents. Whatever model is used, frameworks must be prepared in a collaborative way with local communities and stakeholders, **and should go through a staged and fair process that includes careful consultation and independent scrutiny.**

Old Kent Road OA

The expectations for the Old Kent Road OA could be better stated; making clear in the two paragraphs that the area includes a substantial area of LSIS, not just SIL; clarifying how existing industrial accommodation (against which nil loss can be measured) should be measured; broadening the scope of expectation for new industrial accommodation; recognising that niche manufacturing and service and repair activities are vulnerable in much the same way as creative industries (indeed the categories overlap) should accommodation they rely on be lost; making clear that while town centre extents should be tightly drawn, they should include areas around the main spine of the Old Kent Road (and a few adjoining spines) where it is realistic and desirable to strengthen and nurture high street settings; and to make clear that some of the future public open space needs of the area could be achieved by giving designation protection (not currently in place) to existing open spaces that could be adjusted to allow fuller public use. We suggest amendments as follows, or similar (grey is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

para 2.1.14

Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining **substantial scale industrial areas** ~~significant areas of Strategic Industrial Locations~~ that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should plan for no net loss of industrial floorspace capacity (**measured to include yards**) and set out how industrial land can be intensified and **how development can** provide space for businesses that need to relocate from **industrial accommodation any SIL identified for non-industrial or mixed development**. Areas that are released from SIL **and LSIS, and sufficient other identified areas**, should **be used-~~seek~~** to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing **and future** creative industries, **niche manufacturing, service and repair activities**, should also be protected and supported.

New Cross / Lewisham / Catford OA

The expectations for the New Cross / Lewisham / Catford OA could be better stated, making clear in the three paragraphs that the area can play a significant role in providing workspace, including light industrial that is in high demand in the area, and is crucial if change in the adjoining Old Kent Road and Deptford Creek / Greenwich Opportunity Areas is not to result in economic damage due to lack of space for displaced business (as well as incoming and new business) to settle in. We suggest amendments to two of the paragraphs as follows, or similar (grey is existing text, red indicates suggested additional text):

para 2.1.16

There remain significant opportunities for redevelopment especially around stations, which should complement the existing education, leisure, employment and retail offer in New Cross as well as provide additional housing **and workspace, including light industrial accommodation to help meet needs in the wider area**, alongside public realm and highways improvements. The proposal for an extension of the Bakerloo Line at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London and the emerging artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across the traffic dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.

para 2.1.18

Catford has potential for significant urban renewal. Large-scale redevelopment of five key sites - Catford Shopping Centre and Milford Towers, Laurence House, Town Hall and Civic Centre, Plassy Island, Wickes and Halfords - will help to transform the town centre by 2026. There is scope to restore the fractured town centre and to re-invigorate it by boosting the existing civic and cultural facilities and by providing an improved retail, office and leisure offer, **together with studio and light industrial accommodation to help meet needs in the wider area**. To support the area, approximately 2,700 new homes can be accommodated in the heart of the town centre. In the longer term, the potential routing of the Bakerloo Line Extension Phase 2 through Catford could unlock further development potential elsewhere in the town centre and beyond.

Deptford Creek / Greenwich Riverside OA

We would welcome addition of a section with policy paragraph about the Deptford Creek / Greenwich Riverside OA in which it could be made clear that the area can play a significant role in providing workspace, including light industrial, that is in high demand in the area, and is crucial if change in the adjoining Old Kent Road Opportunity Area is not to result in economic damage due to lack of space for displaced business to settle in (temporary or permanent displacement, as well as incoming and new business). It would be helpful to make clear that there should be no net loss of industrial floorspace (measured including yards) in this area, and that additional space should be planned for.

Town Centres

Drafting of comments on town centre policies was last on our list, and by the time we got to them time had nearly run out before the 5pm on 2nd March deadline to make a submission (in fact there were just 20 minutes to go). Therefore we only offer here a brief observation on a matter that is fundamental to the plan and urgently in need of review. We believe that town centre policy is the weakest aspect of the draft plan, that key evidence has been ignored, while an adequate (fuller) evidence base is lacking. While London faces fast denudation of its high street settings, as residential value trumps existing use value (so that single use housing developments are increasing), and as shortages of accommodation for diverse economic and civic life become ever more apparent, and we hear cries against the downsides of gentrification, the draft plan fails to make more than a passing reference to this complex challenge; it fails to require boroughs to inclusively bring London's high street settings within high street network designation; it tells us nothing about the breadth of uses the Mayor wants to see sustained and welcomed into town centres (surely much more than the NPPF list of main town centre uses, but we are not told that); it fails to tell us whether the Mayor foresees high streets lengthening and strengthening (or the sad reverse); it fails to define a protective intent for town centre policy; it fails to give any guidance on appropriate development formats within town centre designated areas; and it opens up the opportunity of ground floor residential within town centres while it should be stamping that out.

In our Old Kent Road area the thriving stretches of high street are outside of town centre designation, they have no planning status. Even if they were within town centre boundaries draft London Plan policy and proposed New Southwark Plan policy would not be clear with an intent to hold on to and expand the capacity for non-residential uses. It is all vulnerable, and we are starting to lose it. The same is going on along nearby Queens Road, Peckham Road, Camberwell Road and Southampton Way. Just as the need for a major expansion of high street accommodation becomes evident, as our population rises, as more prosperous people arrive, as waves of incoming businesses join burgeoning locally grown businesses, as new education and cultural institutes head our way, as our workshops, our bakeries and breweries burgeon, we find ourselves with shrinking scope of high street setting, and we see our local planning authority casually allowing a ferocious strip-out of depth accommodation (replaced with pure housing). Unless changed the London Plan will not help, indeed it could make matters far worse.

The Mayor's own (excellent) *High Streets for All* document makes clear that close to 70% of high streets are potentially under threat as they have no planning designation. The London Plan must strongly guide boroughs to review town centre designation extents within Local Plans so that they much more fully encompass high street setting extents, then it must guide boroughs to set out policies that protect the space to welcome a diverse economy, and give it capacity to grow. The London Plan needs to insist that Local Plan town centre policies should define clear expectations for the way use mix in town centres should be done, and it should indeed be emphasised that ground floor residential is not appropriate in such settings as London needs to sustain its capacity to accommodate a full economic and civic life and allow its strong clustering in town centres.

We urge that there be a full review of town centre policy at the Enquiry in Public. While we have not been able to offer up extensive evidence and justification at this stage, we would like the opportunity to appear on this matter at the Enquiry.

Chapter 3, Design

Policy D2 regarding delivering good design, and associated paragraphs, are unacceptable as they provide guidance (some of it with the potential to be good) that would properly apply to the process of preparing Local Plans, documents that have a required process that enshrines some consultation and maintains some fairness, yet here they are presented in relation to murkier processes. Many of the suggestions here need to be relocated to a policy that describes the Mayor's expectations for the preparation of Local Plans and associated planning frameworks, with particular emphasis on achieving fairness, and how the Mayor will support. This surely is appropriate for the London Plan. The reference to design review as a form of scrutiny, and mention of transparency in relation to a shockingly un-transparent add-in to the opaque pre-application processes is offensive. It really is troubling that the London Plan has so much to say about this niche part of the sew-it-all-up-before-consulting procedures that have become routine in planning and development, yet close to nothing to say about how the planning system as a whole should

be operated to improve fairness, comply with requirements of the law, be more accessible, address democratic deficits, open up to dialogue, and reduce violations of people's rights.

I would like to say more on this (particularly as my former job was Head of Design for London, at the GLA) but I have run out of time heading towards the consultation deadline. I urge that Policy D2 and its relationship with all those small moments in the draft plan that refer to consultation and fairness (and so on) in the planning system, should be a topic at the Enquiry in Public, and I would like to give fuller evidence on this matter.

Policy D4 regarding housing quality and standards, and Policy D6 regarding optimising housing density, have nothing to say about the inclusion of accommodation for other uses into predominantly housing areas and housing developments, nor about home-working and the need to allow for and support the evolution of accommodation to meet the needs of businesses that operate at or alongside homes. Likewise para 3.6.6 about masterplans and strategic frameworks makes no mention of non-residential uses. These are major omissions. The failure to mention the need to incorporate accommodation for non-residential uses is a shocking one, and is out of line with several other policies and paragraphs in the draft plan that prompted a mixed and hospitable city. This should be corrected.

We can't help but point out how strange it is that the draft plan provides a policy on basement development (no doubt important and valid, but self-evidently niche) yet there is no significant mention in the entire chapter titled Design of our city's need to deliver much more mixed development, combining uses that it has for many decades been assumed to be desirable to separate, and that this is crucial to the city's good growth and to its ability to sustain a welcome for all the economic and civic life that wants to find a home. We note the same in the entire Housing chapter. This is a substantial failing.

Policy D7 regarding public realm should make reference to the needs for goods access, and the appropriate shared use of space that provides goods access. It is important that the London Plan says something supportive about public access and shared use operational yards, and the ongoing presence of goods servicing activity on public streets. Reference could usefully be added as a new point in Policy D7, and could be added to para 3.7.3.

Policy D12 regarding Agent of Change is welcome, but it is important that it be made clear that the principle applies across the range of uses present in London, and is not limited to places of recreation, entertainment and enjoyment. We assume that use of the word *venue* in section D is a drafting error. The word should be *uses* or perhaps *activities*. Paragraphs should make clear that the policy applies to such as industrial, studio, office, education and healthcare, retail, and so on, as well as venues and hospitality uses.

Chapter 4, Housing Chapter 5, Social Infrastructure

Policy H2 regarding small sites is welcome, but it is vital that it does not have the result of stripping out the already denuded filigree of small-scale accommodation for non-residential across London outside centres and industrial areas, nor suffocate delivery of further such accommodation. The phrase *underused sites* in section D needs carefully defining. Section F could have a further numbered point added stating that **presumption in favour small housing developments should not be applied to: development that would result in the loss of non-residential accommodation, if this will not be reprovided.** A para could helpfully be added requiring that loss of existing accommodation for non-residential uses, including civic / community, small office and studio, workshop / light industrial, and storage, should be avoided, or equivalent space should be re-provided. It should also be stated that housing developments should proportionately incorporate additional non-residential accommodation, wherever it is apparent that there is a need.

para 4.66 requiring higher levels of affordable housing on land released from industrial, is unlikely to be realistic, and it could have the effect of suffocating the potential for industrial intensification associated with such developments, and the potential for incorporating industrial as part of mixed developments that include residential. The objectives for greater weaving in of industrial accommodation, and increased density (including multi-storey) presents viability challenges that are proving hard to overcome. This policy needs careful review.

Policy H10 regarding redevelopment of existing housing and estate regeneration makes no mention of providing non-residential accommodation. It is important that this be one of the requirements of such hard to achieve redevelopments, and that this be understood as a key part of delivering pieces of city with a mix of activity, rather areas of single use suburb. Adjoining our own Old Kent Road area the redevelopment of the vast Aylesbury Estate is slowly and painfully moving forward. It seems tragic that, while businesses in the Old Kent Road area, and nearby Camberwell, Walworth and Peckham, face expulsion due to accommodation shortages, no significant quantity of non-residential accommodation is being provided as part of the Aylesbury redevelopment; not a single courier depot or builders merchants, not a single workshop for joiners, caterers, steel fabricators, car repairers, no place for the fast growing bicycle manufacturer who have been talking to us recently about their imminent eviction and the near impossibility of finding accommodation in the area, or the start-up precision engineering business being pushed out of their railway arch as rents triple, or the 6 car repair businesses who have been pushed out of the Old Kent Road area in the last year alone. This policy needs changing to match the good growth objectives, with their great focus on mix and diversity, that infuse the draft plan.

Chapter 5, Social Infrastructure Chapter 6, Economy

Policy SC regarding health and social care and Policy S3 regarding education and childcare facilities say good things about the relationship to where people are, and to public transport, but this should be explicitly linked to high street settings as incorporated within the town centre network. To achieve good growth there should be encouragement for the location of health and education provision in high street settings.

Chapter 6, Economy

Policy E2 regarding low-cost business space should be widened to include B2 and B8, as these categories of accommodation are experiencing similar pressures as B1. There seems to be no justification for narrowing the scope of this from all B class accommodation. The bracketed text in section B could helpfully be expanded to read **(including creative and artist studio space, workshop and light industrial space)** as there is no justification for singling out one category of economic activity while excluding others.

We note that town centre policy does not align with E2, as there is no mention there of the need to protect and plan for low-cost business space. Likewise the helpful text in para 6.2.1 finds no echo in the town centre policies and supporting text. This should be corrected.

In policy E2 or supporting paragraphs there should be mention of how floorspace should be measured for the purpose of policy compliance, and that operational yards should be include in the measure. There should also be some reference to the importance of access arrangements, daylight, ceiling height and floor strengths. The policy text should refer to *hybrid* workspace, rather than *flexible* workshop. *Hybrid* is generally understood to refer to accommodation that has adequate goods access, such that it can be used for either office and studio activity or light industrial activity, whereas *flexible* workspace usually refers to small scale office or studio accommodation that has minimal goods access.

Policy E3 regarding affordable workspace, should refer to a definition of workspace, and this should include all B class categories, not be restricted to B1. Section A point 2 should be widened to refer to **specific sectors that have cultural value or niche economic significance, such as artists' studios, designer-maker spaces, specialist manufacture, repair and servicing**, thus reducing the sectarian bias. Section A point 3 could usefully refer to **groups starting up or continuing to trade in any sector, or doing activities that provide good access to employment and enterprise to disadvantaged groups**. Section E could helpfully refer to **workspace providers or to individual businesses / organisations**, as specialist workspace providers are not always the best way forward and they can escalate cost.

Para 6.3.4 related to Policy E3 should include boroughs in its scope, stating that the Mayor will, and boroughs should, encourage the delivery of new workspace.

We have substantial concerns about Policy E4, E5, E6 and E7 regarding industrial accommodation. In order to efficiently communicate our observations we have prepared suggested amendments to those policies, pasted below. However, more should be done than just tweaking the draft policies. We would like to see more foresight in these policies, more recognition of the exciting potential of London's strong industrial economy, and the setting out of an ambition for strengthening the embeddedness of this economy in localities across the city, a key component of the good growth that they Mayor is advocating.

Regarding quantity of industrial accommodation in London we note that all the evidence, used as justification for these policies, points to the need to halt the loss of industrial accommodation, indeed it indicates a need for expansion, and Policy E4 states that *retention and provision of industrial capacity should be planned monitored and managed having regard to the Table 6.2* (and, strangely, *Table 6.1*), but then, seemingly undermining the policy and (surely) its intent, the very next sentence states that the *no net loss* policy only applies to SIL and LSIS. If this policy wording is not changed then it will still allows the rapid loss of the 36% of London's industrial accommodation that is Non-Designated, as is currently ongoing. This is a nonsense that is not explained and should be corrected. The policies must be amended so that they properly act on the evidence that the GLA has gathered. We suggest that the preferable way forward would be to set targets for increases in industrial accommodation, per borough, or per smaller chunks of London. This would follow the prompt given by evidence of supply shortage and need, and would clear away all residues of previous managed shrinkage policies.

We are further concerned that the text is fuzzy on what constitutes *floorspace*. In E4 it states that the *no net loss* (from the anointed 64% of London's industrial areas) includes operational *yard space* as well as industrial *floorspace*, yet by saying it like that it makes clear that *floorspace* does not include *yards* (it is distinct from them). Then in 5.4.5 where it defines *floorspace* there is no mention of *yards*, and *floorspace* is clearly only describing buildings, and all of a sudden a low plot ratio of 65% is mentioned.

An example, reflecting on the *floorspace* fuzz: Over the road from the Old Kent Road Tesco there is an industrial site for which a planning application has just come in. It is currently fully occupied by a highway works contractors depot. It's in a LSIS. There are no buildings, it is 100% yard, all 7,300 sq m of it. The way I read the Draft London Plan is that, while in passing there is mention of retaining *yard* capacity in SIL and LSIS, the *no net loss* policy actually just refers to *floorspace*, having indicated (perhaps unintentionally) that *floorspace* does not include *yards*. So I guess there is nil *floorspace* on that site currently, and the *floorspace* potential using the 65% basis would only be 4,745 sq m, just 65% of the currently fully used *yard*. In reality the application includes only 1,377 sq m of industrial (a little token chunk amongst the residential) yet the GLA letter (bravo to the GLA case planners, now undermined by the draft London Plan) suggests that a good benchmark for what should be required (even in a mixed scheme, the principle of which is accepted) is the 9,166 sq m of industrial that an earlier scheme (a still extant permission) proposed for the site. So to reiterate: In this case the currently occupied industrial sq m is 7,300, the GLA letter is pushing for 9,166 sq m, while it appears that draft London Plan Policy E4 read together with para 6.4.5 would only require retention (or find space elsewhere for) 4,745 sq m. This is a substantial problem.

The weakness on the undesignated 36% of industrial land is a major threat to London's ability to accommodate its economy, and it suggests that the policy drafters have not shifted as far as we hoped towards understanding that a good London will have more (not ever less) filigree industrial accommodation (workshops around the back and so on), at the smaller scale, in every locality, not just the bigger industrial chunks able to house the larger footprint end of London's industrial activity.

We note that the borough benchmarks in the demand study are based on all industrial land, and our understanding is that the *retain* applies to the overall stock of industrial land, so the weakness in relation to Non-Designated Sites makes no sense, and no explanation has been offered.

We have not been able to comment on Figure 6.3 drawings, but we do not believe they are adequate for their role. They should be reconsidered.

The policies and text leave it unclear against what baseline the *no net loss* (of whatever categories, or all categories, of designation / non-designation) will be measured. This is a crucial matter. What is the baseline map, per borough, of industrial accommodation, against which to measure efforts to meet the new policy (whether it be about all

industrial *land*, or all minus non-designated and former utilities in the nightmare version)? We need those maps, and we need them available to the public, linked to the policy, otherwise all will remain a blur and the policy will not have the desired result. Where can the world see those maps? The plan should make clear.

We suggest removal of reference to excluding sites previously used for utilities infrastructure or land for transport functions no longer required from the *no net loss* requirement. There is no justification for this exclusion and it is inconsistent with the conclusions of the studies which are key to the evidence base.

We suggest amendments as follows, or similar (grey is existing text, blue struck indicates suggested deletion, red indicates suggested additional text):

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

A

A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. This should make provision for:

1. light and general industrial uses
2. storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
3. secondary materials and waste management
4. utilities infrastructure
5. land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
6. wholesale markets
7. emerging industrial-related sectors
8. flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
9. low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Low-cost business space) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

10. Building material supply and equipment hire and servicing uses

(Addition of item 10) to that list is suggested because this large and crucial category, the most notable omission from the list)

(We suggest addition of a new para as follows:)

Boroughs should carefully audit industrial activity and map industrial accommodation across their area, and in their Development Plans should clarify the planning status of all industrial sites, refining policies maps and introducing designation where appropriate.

(Many might think that this, the audit and map part, is a normal part of Local Plan preparation, but it is not. For the London Plan to require this would be a huge step forward. Clarifying status is the essential job of Development Plans, but most boroughs seem to have forgotten that)

B

London's land and premises for industry, logistics and services falls into three categories:

1. Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)
2. Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites
3. Non-Designated Industrial Sites - see below.

C

The retention and provision of industrial capacity across the three categories of industrial land set out in part B, **and in mixed developments elsewhere**, 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 measured to~~ **include** operational yard space capacity) within designated SIL, ~~and~~ **LSIS and Non-Designated Industrial Sites**. 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, 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.

(Addition of the phrase *measured to include* is crucial as yards can be substantial, in some cases the entire site. Provision beyond current industrial areas should be clearly encouraged. Adding in Non-Designated Industrial Sites would be an important improvement to the policy, one that is crucial to make a plan that does its job of seeking to meet identified needs. The GLA has produced strong evidence that nil nett loss of industrial accommodation is what's required (at the least) to reduce the damage that constricting supply of accommodation will have on the industrial economy. To then ignore the evidence and leave policy relaxed about continued loss of Non-Designated Industrial Sites (36% of London's total industrial land) and to advocate further extensive release of industrial land, to mixed use development that incorporates industrial, an untried form of development, is inappropriate and presents a major threat to London economic strength and diversity, is a direct challenge to the wider good growth objectives. Substantial amendment is needed.)

D

The retention and provision of additional industrial capacity should be prioritised in locations that:

1. Are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
2. Provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
3. Provide capacity for micro, small and medium-sized enterprises, **and small branches**.

(Policy should not be prejudiced against small branches of larger businesses, these being a major component of London's industrial economy)

4. Are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

E

Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

F

Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

G

Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

H

Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs **and small branches**, in particular where there is a local shortage and demand for such space.

6.4.1

London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, **niche and just-in-time manufacturing**, vehicle maintenance and repair, building **material supply**, **trades**, construction, waste recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands.

(The policy to which 6.4.1 refers will be more effective if the list of activities is closer to comprehensive)

6.4.2

Wholesale markets have historically played an important role in London's economy distributing fresh products to retailers, restaurants and street markets across the capital. Their future role is affected by competition from alternative distribution systems but they are also taking advantage of trends towards increased eating out and are supplying a range of products to London's diverse communities. This Plan continues to recognise their role whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

Comment on this section

6.4.3

Industrial land and floorspace provides the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares of land in industrial and related uses of which about 50 per cent was within SILs, a further 14 per cent was in LSIS designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites which **are were** not designated in Local Plan policies maps.

6.4.4

Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was transferred to other uses. This was well in excess of previously established London Plan monitoring benchmarks. Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. The GLA's assessment indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041. However, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones.

6.4.5

Based upon this evidence, this Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London **in designated SIL and LSIS**. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace (**measured to include operational yard space**) on site or the potential **internal** industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater). ~~The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.~~

(6.4.5 amendments would remove reference to just SIL and LSIS, to align with suggested change to E4 section C that are supported by the evidence base and the overall intent of Policy E4. Inclusion of yards is crucial to success in these policies. Internal needs stating (excluding yards) if policy sticks with the 65%, because a reasonable figure would be 100% if it was inclusive of yards. The text about utilities and transport functions is not consistent with the studies that are the key evidence base; predicted changes to demand from a range of sectors (including those) were part of the whole assessment, and still nil net loss was the conclusion).

6.4.6

Guidance on the approach to be taken to the management of industrial floorspace capacity at borough level and across industrial property market areas is provided in Figure 6.1 and Table 6.2. Boroughs in the 'Provide Capacity' category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.

6.4.7

Boroughs in the 'Retain' category should seek to intensify industrial floorspace capacity following the general principle of no net loss ~~across designated SIL and LSIS~~. All boroughs in the Central Services Area fall within this category in recognition of the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.

(Removal of reference to just SIL and LSIS, would align with suggested changes to E4 section C, which are put forward in order to match plan policies with the evidence that the GLA has gathered and conclusions drawn from it)

6.4.8

There are three boroughs in the 'Limited Release' category (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. There is scope in these selected boroughs for limited release of industrial land in SIL and/or LSIS through a plan-led approach to reduce these vacancy rates and support the re-use of surplus land and floorspace for other uses.

Policy E5 Strategic Industrial Locations (SIL)

A

Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's **largest concentrations** ~~main reservoirs~~ of industrial, logistics and related capacity for uses that support the functioning of London's economy.

(The *main reservoir* phrase is a residue from the days of advocating release of much of the non-SIL industrial land. The phrase is now absurd as SIL is only 50% of the total, and surely if nil release is the policy then its all the *main reservoir*, not just half of it)

B

Boroughs, in their Development Plans, should:

1.

Define the detailed boundary of SILs in policies maps having regard to 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 use the adopted Local Plan SIL boundary as the basis for decision-making

2.

Develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C

3.

Explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

C

Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:

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
6. Small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.

D

Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out 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.~~

(Coordinated masterplanning processes if not integral to Development Plans are a route to unfair planning, frequently taken forward in violation of Gunning principles that define fair consultation, this should not be promoted by the London Plan)

E

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. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

6.5.1

London's SILs, listed in Table 6.3 and illustrated in Figure 6.2, are the capital's **largest concentrations main reservoir** of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy, **and because they have the greatest scope for industrial intensification**. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses and particularly residential development.

(The most ready scope for intensification now becomes a key reason to distinguish SIL from the rest of the *reservoir*)

6.5.2

SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs. Typically, they are located close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods, construction materials and waste to, from and within London. To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London. This should be complemented by smaller-scale provision in LSIS, Non-Designated Industrial Sites, **and mixed-use developments elsewhere**, including sustainable 'last mile' distribution close to central London.

(There is now a call for industrial accommodation in locations where it is currently isn't present, in mixed developments, so this should be referenced where relevant)

6.5.3

Innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area Planning Frameworks. This includes collaborative working with other planning authorities in the relevant property market areas including authorities in the Wider South East (see also Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements. The Thames Gateway provides the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham.

Policy E6 Locally Significant Industrial Sites

A

In their Development Plans, boroughs should:

1.

Designate and 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)

2.

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 small branches** and distinguish these from local employment areas that can accommodate a wider range of business uses.

(There is an urgent need to designate land that is not currently designated because it was previously thought it did not matter (could all be got rid of). Change of strategic policy, to no nett loss, strongly supported by the evidence base, now require fresh designation, not just refining boundaries of already designated land),

6.6.1

Boroughs may designate locations that have particular local importance for industrial and related functions as Locally Significant Industrial Sites. These designations should be based on evidence in strategic and local demand assessments and should complement provision in SILs. Inner London sites providing sustainable distribution services for the Central Activities Zone and Northern Isle of Dogs may be particularly appropriate for this designation.

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

A

Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:

1. development of mezzanines
2. introduction of small units
3. development of multi-storey schemes
4. addition of basements
5. more efficient use of land through higher plot ratios having regard to operational requirements (including servicing) and mitigating impacts on the transport network where necessary.

B

Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in part E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (~~and with~~ the areas affected clearly defined in Development Plan policies maps) ~~or as part of~~ supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, **that closely involves relevant businesses**, and not through ad hoc planning applications.

(Masterplanning processes should support and feed into Local Plan preparation, as Local Plan preparation has a reasonably fair process (staged consultation, independent inspector etc). Masterplanning process is not an acceptable *instead of* option, that opens the way to Gunning principles violation a-la OKR current process. It is important to emphasise that businesses should be asked, involved, consulted)

C

Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions 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. This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (~~and~~ clearly defined in Development Plan policies maps) ~~or as part of~~ supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, **that closely involves relevant businesses**, and not through ad hoc planning applications.

D

Mixed-use or residential development proposals on Non-Designated Industrial Sites will be supported where:

1. there is no reasonable prospect of the site being used for the industrial and related purposes set out in part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
2. it has been allocated in a Development Plan for residential or mixed-use development on the basis of part D.1; or
3. industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4. suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in parts E.2 to E.4 below.

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 industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
2. the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
3. the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied
4. appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:

- a) safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)
- b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)
- c) design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)
- d) vibration and noise (see Policy D13 Noise)
- e) air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).

F

Development Plans and planning frameworks should consider, in collaboration with neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

1. this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land
2. full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles
3. a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements where relevant, is in place to support this process.

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.

6.7.1

In collaboration with the Mayor, boroughs are encouraged to explore the potential to intensify industrial activities on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential **and with other non-residential uses (for example in town centres and predominantly residential areas)**. Through Local Plans, boroughs should also take a proactive approach to the management of vacancy rates to reach a level appropriate to the efficient functioning of the industrial market (considered to be five per cent for land and eight per cent for floorspace).

(Suggested to match wording to the clear intent that industrial should be present across London at a small as well as a larger scale, and should not be ever more concentrated in big industrial areas. Wording should encourage a filigree of industrial accommodation, such as weaved in with residential development, within high street settings (the *town centre network*), and on assorted small scraps of land everywhere).

6.7.2

Whilst ~~the majority of land in SILs~~ **most industrial land** should be retained and intensified for the industrial-type functions set out in part C of Policy E5 Strategic Industrial Locations (SIL), there may be scope for selected parts of SILs or LSISs to be consolidated. This should be done through a carefully co-ordinated plan-led approach (in accordance with parts B, C and E of Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the transfer of some land for a mix of uses including residential. Local Plan policies' maps and/or OAPFs should indicate clearly: (i) the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites) and (ii) the area to be removed from SIL or LSIS (see illustrative examples in Figure 6.3). To ensure that such development works effectively, there should be a development agreement in place between a residential and industrial developer to support this process. In order to follow the Fast Track Route (see Policy H4 Meanwhile use), industrial sites will need to meet the 50 per cent threshold for affordable housing.

(To be consistent with the no nett loss as a whole policy that the evidence base supports)

6.7.3

Outside of areas designated as SIL or LSIS there may be opportunities to deliver a mix of industrial and residential (or other uses) on the same site either side-by-side or through vertical stacking. Mixed-use and residential development proposals on existing Non-Designated Industrial Sites should ensure either that there is no reasonable prospect of the site being used for logistics/ industrial purposes, or incorporate light/general industrial or storage/distribution uses or put in place suitable relocation arrangements for any businesses/operations affected.

(Industrial can be mixed with all sorts of uses, often more easily with other non-residential uses than with residential. Why not industrial weaved together with a school, or next to / under office accommodation, or linked to retail? The plan should encourage such innovations)

6.7.4

Evidence to demonstrate 'no reasonable prospect' should include:

- strategic and local assessments of demand
- the site should have been marketed with appropriate lease terms, and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users
- evidence that the scope for mixed-use intensification with industrial uses has been explored fully.

6.7.5

There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital. There may be scope for some substitution of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion.

6.7.6

Collaborative working between the Mayor, boroughs and other stakeholders (including industrial businesses) on Development Plan reviews, planning frameworks and masterplans provide useful mechanisms to co-ordinate these processes. This should ensure that the need to maintain sufficient capacity for London's industry, including that which services to service-London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses.

(Not much talking to the businesses has been happening. The Mayor should encourage more. The role of London's industry does indeed include servicing London's economy and residents, but it does much more than that.)

Chapter 7, Heritage and Culture

Policy HC5 regarding supporting London's culture and creative industries, should have its section B about CEZs re-phrased to state that **Boroughs are encouraged to work with the Mayor and relevant stakeholders, and they should identify Creative Enterprise Zones in Local Plans.** So, it should be a requirement for boroughs to designate CAZs and define appropriate policies, not something they can choose not to do.

Chapter 12, Monitoring

Table 12.1 showing key performance indicators and measures should include no net loss of industrial floorspace from all locations, not just designated locations. This will marry with the policy intent of no nett loss that is supported by the evidence base. It must be clear that measures should include floorspace measured to include operational yards.

Definitions

Many words and phrases, some used in a jargonistic / niche manner, that are key to understanding and applying the requirements of the plan, are not defined in this section. They should be. Some we noted are:

Workspace, Consultation, Community, Local Community, Local Communities, Stakeholders, Cultural, Edge of Centre, Flexible Workspace, Industrial, Light Industrial, Local People, Optimise, Place-Making, Spatial Inequalities, Town Centre Uses, Town Centre Health Check, Transparently, Edge, Fringe, Underused Site, Neighbourhood. We request that a full review of the Definitions section be carried out following a full check-through of the Plan text.

We look forward to receiving acknowledgement that these comments have been received.

Good wishes.

Mark

Vital OKR

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