

Mr Daniel Hill comments

Page: [Policy GG5 Growing a good economy](#)

Section: [1.4.10](#)

I strongly support this point: London's economy needs to become more diverse, both sectorally and geographically. The economic context is changing rapidly - e.g. Reduced demand for 'big box' retail, increased demand for logistics and micro-industrial spaces, affordable studios - and significant growth in outer London.

There is a need to decentralise the city to create positive and lively places around London and to reduce overcrowding on commuter transit.

I am not sure that the remaining policies (E1-E7 etc.) provide sufficient support for this laudable objective.

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See comments above

Although the overall policy direction of travel is positive, there is too much wriggle room in the wording that could allow significant ongoing loss of office space - particularly in non prime areas. Affordable office space/space for SMEs is subject to significant demand but is often ignored in favour of new Grade A spaces. Furthermore the focus on South and West London is too focused. For example LB Newham has 95% SMEs but very little suitable space being delivered through the planning system and lots of evidence for demand for suitable flexible/affordable workspace/offices.

Moreover office space should not be seen in isolation. Local office spaces are complementary to retail spaces, industrial spaces etc. and assessments for their removal should take account of wider economic development objectives including the Good Growth principles set out in this plan. This should be inserted into the policy wording at the appropriate place.

More specifically:

The policy states that 'Existing viable office floorspace should be retained'

There needs to be a clearer view on viability here. what does viable mean? If an application comes forward that says that residential is more viable, then a developer could argue that existing space is not viable. The emerging EPC Level E minimum will also have an impact here. I would suggest replacing the wording with 'Existing office floorspace should be retained unless there is evidence of a lack of ongoing appropriate demand for suitable employment uses'.

The policy directs local authorities to develop an Art 4 directive where appropriate, but doesn't provide any guidance in the text below. Appropriate should include a range of factors such as evidence of demand, particularly amongst SMEs, support for wider-place making etc.

Page: [Policy E2 Low-cost business space](#)

Section: [6.2.1](#)

The supporting text should be clearer on when and how engagement with existing businesses (including short term lessees) should take place i.e. Pre planning and in depth.

Page: [Policy E3 Affordable workspace](#)

Section: [E3](#)

Insufficient clarity on the trade offs between needs for affordable housing and affordable workspace: In most parts of London the commercial space will often lose money for the developer and there is a danger that it is lost due to the understandable focus on affordable housing provision. The plan needs to set out how high quality non-residential provision can support viability and delivery of residential and how schemes will be assessed in order to meet what could otherwise be seen as competing demands on a limited pot of 'profits'.

We have seen a positive outcome where local authority puts a clause into the s106 about providing the commercial space at de minimis rents to recognised affordable workspace providers if the developers are unable or unwilling to fill the space. This should be suggested.

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

Section: [E7](#)

I strongly support the potential role that light industrial uses /of some segment of B1c for (edge of) town centre / high road regeneration is mentioned in E7 but not really explored and I think this will be more important given the sudden recent decline in retail / casual dining - Maplin, Toys 'r Us, Prezzo, Jamie's etc all bust or shrinking, and it seems structural. So there's a growing importance of well-thought-out and well designed B1c, albeit on the workshop / studio end instead of 'industrial' end, to sustain diverse town centre economies. The GLA could consider doing a diagram for a town centre like the one on SIL on p251., I feel this issue is rather underplayed, as is the potential contribution of B1a/B1c space in housing renewal areas.