

## **Mixed use ‘regeneration’ of employment land in the post-industrial city: Challenges and realities in London.**

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### **Abstract**

*This article explores the relationships between land use policy, property and economic development, with a focus on the changing attitudes towards employment land in post-industrial cities. Drawing on case study data from two London local authorities, it finds that planning authorities are moving away from protecting employment land to actively promoting the mixed use redevelopment of employment sites, even when there are thriving businesses on these sites and a shortage of supply of employment premises and land, relative to demand. We examine the drivers for changing policy including the national and regional policy contexts, housing targets, the influence of austerity measures, rise of Neighbourhood Planning and changing conceptions of regeneration and the role of housing therein. The article highlights the complex task faced by local planners and the tensions involved in simultaneously finding sites for housing, fostering economic development, and promoting mixed use redevelopment in planning policy and decisions. We find that changes in policy are fuelling speculation for housing development on sites occupied by viable businesses, supporting rather than responding to deindustrialization. This is leading to a gap between aspirations for delivering mixed use environments on hitherto employment sites and realities on the ground.*

### **1. Introduction**

The mixed use redevelopment of land previously used for industry has long been put forward as a good solution to the problem of post-industrial cities. In the 1990s, the architect, Richard Rogers, characterised London as a city whose “industries have departed ... [and] many of its neighbourhoods have collapsed” going onto argue that “housing is one of the keys to consolidate the neighbourhoods of our city” and that we should “redevelop derelict and brown land to produce dense, compact and mixed developments” (Rogers and Gumuchdjan, 1997: 106, 112, 118). These ideas directly informed urban policy recommendations (UTF, 1999; DETR, 2000) and, as illustrated in this paper, are still influential today. However, with London now experiencing high housing demand and residential land values, strong concern is being expressed by community and business groups and the property industry about the loss of remaining functioning employment land and premises through residential-led mixed use development (JSEP, 2014; Barton Wilmore, 2015; BPF, 2015, 2014).

Across London, employment sites are being encouraged – through planning policy – to be redeveloped for mixed uses, variously labeled as Mixed Use Regeneration Areas, Mixed Use

sites, Growth Areas, Mixed Use Employment Locations, or even Housing Zones<sup>1</sup>. This might seem a practical solution when the population is projected to grow by 37% between 2011 and 2050, whilst over the same period the GLA's employment projections predict jobs will drop by 88% in manufacturing, 73% in primary and utilities, 52% in wholesale, and 38% in transportation and storage (GLA Intelligence, 2013). These projections are based on extrapolating past trends, which have seen substantial shifts in labour demand driven by both technological progress and an increasingly open world economy (see Cheshire et al, 2014 for an account of the structural changes to the UK and its metropolitan economies). This article argues that, rather than being a response to deindustrialization, the move from single to mixed land use policy designations in the absence of a broader strategy is undermining viable businesses and remaining industry. Thus, the ongoing loss of jobs in manufacturing and industry is not inevitable but fuelled by policies that displace these industries. In this article, the broader term 'employment land' is used in preference to 'industrial land' to reflect the broader range and hybridity of uses found on such sites (Ferm and Jones, 2015; Ramidus, 2012).

In New York City, which has also seen significant residential speculative development on employment land, empirical studies show that real estate speculation - not deindustrialization - is driving the loss of remaining industrially-zoned sites (Curran, 2007), and that planners have passively supported deindustrialization through ambiguously defined and poorly enforced land use regulations, which in turn contribute to property speculation (Wolf-Powers, 2005). We would expect the same outcomes in London, but so far evidence is mostly anecdotal<sup>2</sup>. The planning system in the UK is also different. Whereas in the US, developers are legally obliged to conform with the zoning ordinance, the planning system in the UK is discretionary<sup>3</sup>; sites can be designated for employment use in local plans but developers can negotiate with planning authorities on a case-by-case basis.

The aim of this article is to explore the relationship between land use policy and property development on employment land in London. The next two sections set out the national and regional policy context supporting the mixed use redevelopment of employment land and examine the literature on how planning policy and decision making is influenced by property development, approaches to economic development, and dominant ideas influencing planning. The following two sections focus on case studies of the London boroughs of Camden and Lewisham; inner London boroughs with a distribution of fine-grained employment land, rather than the large swathes seen in East London, the Lea Valley or Park Royal (see Figure 1). They are also both experiencing a heated property market and high demand for residential, considered typical of boroughs surrounding the Central Activities Zone (CAZ).

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<sup>1</sup> Examples are taken from planning policy documents in the London boroughs of Hackney, Wandsworth, Camden and Lewisham.

<sup>2</sup> Anecdotal information has been gathered by the authors who are members of Just Space Economy and Planning (JSEP), a London-wide network of business and community groups working together to influence planning policy on economic matters. For more information see <http://justspace.org.uk/category/economy-and-planning/>

<sup>3</sup> see White and Allmendinger, 2003, for a comparison UK and US land use planning with respect to the housing market.

*Figure 1: Map of employment land distribution in London 2015, showing location of Camden and Lewisham boroughs. [Adapted from AECOM, 2016: Figure 2.2. GLA Copyright]*

In each case study, the drivers of policy change are investigated through content analysis of planning policy documents, employment land reviews and other evidence, unpublished reports obtained through freedom of information requests<sup>4</sup> and an analysis of secondary data. Property development outcomes are ascertained through an interrogation of planning records, site visits, observation and developers' marketing and consultation materials.

## **2. National and regional policy context**

The UK planning system allocates uses to a broad range of 'use classes'<sup>5</sup>, and proposals to change the use of a site normally requires planning permission, unless 'permitted development' rights allow such changes without permission. The system is plan-led, meaning that planning applications are determined primarily with reference to the 'development plan' – normally this is the local plan, but in London it is the local plan and the London Plan together<sup>6</sup>. Where there is no local plan in place, decisions are determined with reference to the National Planning Policy Framework (NPPF). This section reviews both the

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<sup>4</sup> In the UK the Freedom of Information Act 2000 grants members of the public the right to request information held by a public authority.

<sup>5</sup> See [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use) for further information on the UK's use class system.

<sup>6</sup> Since the introduction of the Localism Act 2011, neighbourhoods within local authorities in England can also prepare their own Neighbourhood Plan, which together with the local (and regional) plan constitutes 'the development plan'

national and regional planning policy context for decision-making on employment land in London.

### *National context*

The NPPF advocates a change of land use where there is a need for housing and directs local planning authorities to:

normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use class) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. (DCLG, 2012: Paragraph 51)

Without a definition of appropriateness decisions can easily go in the developer's favour. The emphasis differs substantially from guidance on economic development (DoE, 1992a) issued twenty years previously, which emphasized that there should be "sufficient [employment] land available which is readily capable of development and well served by infrastructure" (Paragraph 6), as suitable sites were a "scarce and important resource for... industry" (Paragraph 8). This change in approach was influenced by the Urban Task Force report, which proposed that the government "adopt a sequential approach to the release of land and buildings for housing, so that previously developed land and buildings get used first" (UTF, 1999: 12). This so-called 'brownfield first' policy informed planning throughout the early 2000s.

Alongside the 2004 Planning and Compulsory Purchase Act, the Government introduced guidance for local authorities on the preparation of Employment Land Reviews<sup>7</sup> (ODPM, 2004), which emphasised the need to define "sensible criteria in terms of sustainable development and market realism" (ODPM, 2004: 5) which discouraged the so-called 'hoarding' of employment sites (Ecotec and Roger Tym, 2004: 15). The requirement to adopt a sequential approach was abandoned by the Conservative-Liberal Democrat Coalition government in 2010, but there is still support for a more permissive approach to development on brownfield land. The current Conservative Government's focus on housing delivery at any cost is illustrated by its commitment to extending Permitted Development Rights<sup>8</sup> to facilitate conversions of offices and light industrial premises to housing, despite broad opposition on the basis that in practice it is displacing (primarily small) businesses in the process (BCO, 2015), and undermining the delivery of affordable housing (Evans and Smith, 2015).

### *Regional context*

In the London Plan, a transition of land use has been actively planned through targets for the 'managed release' of industrial land. The 33 local authorities are identified as being

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<sup>7</sup> This guidance was withdrawn in 2014.

<sup>8</sup> Explanatory memorandum to the Town and Country Planning (General Permitted Development) (England) Order 2015 No. 596 sets out a wide range of permitted use changes, including storage and distribution buildings to residential use

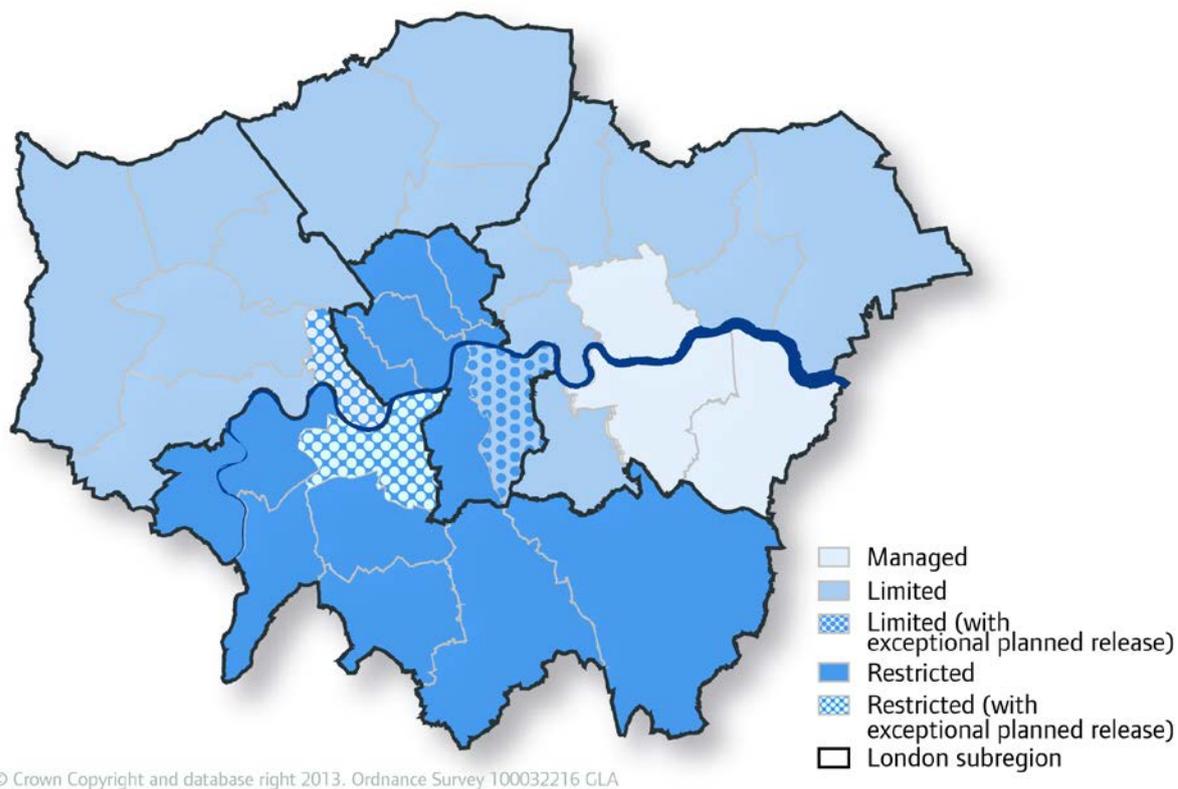


Figure 2: Borough level groupings for transfer of industrial land to other uses  
 [Source: Map 4.1, London Plan (GLA, 2015)]

suitable for either ‘restricted’, ‘limited’ or ‘managed’ release, depending on local supply and demand circumstances (Figure 2).

The London Plan (GLA, 2015; Policies 2.17 and 4.4) identifies three types of industrial areas, which are protected and managed to varying degrees: (1) *Strategic Industrial Locations* (SILs) – representing London’s main reservoir of industrial capacity. Development proposals for alternative uses are required to be approved by the Mayor and should be refused “unless they are part of a strategically coordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document” (Policy 2.17); (2) *Locally Significant Industrial Sites* (LSIS) - identified by the boroughs on the basis of robust evidence and reviewed regularly; and (3) *Other industrial sites* - identified by boroughs. Many sites falling into this category continue to have a local and strategic role for industry (GLA, 2012) and are particularly susceptible to change.<sup>9</sup>

This approach to managed release has been present in the various iterations of the London Plan, but London has consistently lost more than double the benchmark for release (see Table 1).

<sup>9</sup> The GLA now refers to SIL and LSIS as ‘Designated Employment Land’, and other sites as ‘Non-Designated Employment Land’. Local authorities historically often used the term ‘Defined Employment Land’ to mean the former and before the GLA hierarchy was introduced.

Time period	Benchmark per annum loss – Greater London (Ha)	Actual per annum loss - Greater London (Ha)	Ratio of actual loss: benchmark loss
2001-6	39	90	2.31
2006-10	41	86.75	2.12
2011-15	36.7	100	2.72

*Table 1: London industrial land release: comparison of benchmarks and actual loss 2001-6, 2006-10, 2011-15 (Sources: AECOM, 2015; GLA, 2012, Table 3.1; URS, 2007, Table ES1).*

The London Industrial Land Supply and Economy Study (AECOM, 2016: 69) revealed that loss has accelerated in the past five years, particularly in the central sub-region, which lost almost eight times the benchmark between 2011 and 2015). The study also reveals that whereas loss was previously concentrated on non-designated employment sites, in the last five years, the majority of the loss has been from strategically and locally designated employment sites (ibid: 9). This implies that changes to policy are playing a more important role in recent loss, and provides the context for this paper.

### **3. Policy influences: role of property, economic development and notions of ‘a good city’**

In this section, three theoretical perspectives on why there has been a policy shift are presented. The first explores the relationship between planning and property development and exposes the dual role of planning policy to support economic growth and deliver broader social benefit. The second perspective considers the consequences of housing being increasingly seen as an economic development tool. The third considers the role of dominant ideas of what makes a good city.

#### *Planning and property development*

The relationship between planning and property development is well debated. Wolf-Powers (2005) provides three interpretations of the relationship as a useful analytical starting point. The first is the ‘celebratory’ paradigm, whereby planners, in supporting property-led redevelopment, are doing their best in a climate of industrial decline, where incremental rezoning and release of employment land is perceived necessary to adapt to economic restructuring. In London, the extent to which this perspective is valid is debated. The property sector insists that demand for industrial property is growing in London, whereas supply is shrinking and the loss of employment land is negatively impacting on the sector’s growth (BPF, 2015). This implies a weak economic argument for the release of employment land. However, others argue that land supply is in the wrong place for modern industry and although we need new supply to keep up with demand, this need not be on existing industrial sites (Stringer, 2014).

The second is the ‘indictment’ paradigm, which stems from the growth-machine thesis (Molotch, 1976; Logan & Molotch, 1987). Here, planners are in the pockets of developers and landowners and willingly collaborate in the capitalist project in order to enhance land values and increase the economic competitiveness of their localities, with little regard for the negative impacts of displacement, increased inequalities and so on (Smith, 1986, 2002). This is consistent, argues Fainstein (1991), with the fact that planning has become less about

regulating and more about promoting development. In this paradigm, planning contributes to the decline of industry by allowing for piecemeal redevelopment of employment land, causing uncertainty for industrial occupiers and undermining appetite for investment, causing a spiral of decline. This chimes with observations of what has taken place in the London context: “The role of manufacturing and ‘bad neighbour’ firms... is understated in, and even written out of, the globalism discourse. They have been airbrushed out of policy imaginations and frameworks to the extent that predictions of their demise become self-fulfilling prophecies” (Imrie et al, 2009: 7).

The third interpretation sits between these two, portraying planners as “parties to a structural dilemma” who can use their regulatory power to “decommodify space and extract broad based benefits” (Wolf-Powers, 2005: 381). Planners are faced with two alternatives: to enforce controls that shield lower-yielding activities from market forces, or to support the principle of the highest and best use, securing maximum public benefit from the development. As alternatives to funding infrastructure and public services decrease, the balance shifts towards the latter. This resonates with Rydin’s (2013) argument that planning in the UK has become ‘growth-dependent’ and, as funding for the direct provision of public services is squeezed, planners rely on planning gain to secure social and community benefits, and have little choice but to support property development. This dependence on property development has undermined statutory local plans in the UK, suggests Edwards. In a climate of fiscal cutbacks “local planning authorities face the temptation to minimize and narrow the use rights allocated in their plans – in order to lower developers’ and land owners’ expectations and thus increase the scope for ‘gains’ when departures are subsequently allowed” (Edwards, 1990: 178). But, he argues, such policies weaken statutory plans. Other authorities will increase the flexibility of their plans in order to attract investment, ‘sacrificing’ bargaining power in the process. Thus, this process of negotiating planning gain in the UK has weakened the plan-led system over time.

The second and third interpretations reflect tensions in the role of planning in supporting both economic growth and delivering social benefit. The next section turns to the question of how local planning authorities support economic growth argues that housing is being promoted not only to meet housing need, but as an economic development tool in itself.

#### *Housing as an economic development tool*

In facilitating the mixed use redevelopment of employment land, planning valorizes certain land uses and forms of economic activity over others, with a particular emphasis placed on housing. As illustrated in Rogers’ quote in the introduction, by the 1990s housing was clearly viewed as a catalyst for regeneration. As local authorities have taken on more responsibility for economic development, strategies have moved away from supply side policies and equitable distribution of economic activity towards economic competitiveness, with a focus on the infrastructure and housing required to support new economic sectors. There has also been a shift in financial incentives for local authorities, as central Government has changed the way local business rates are collected and distributed.

In the post war era, economic development was the remit of national government and the focus was on promoting inter-regional equity and rebalancing the economy. The Inner Urban Areas Act of 1978 empowered local authorities to address inner city decline and

preserve the remaining manufacturing base, encouraging them to take on more responsibility for economic development in the 1980s, reinforced by the Local Government and Housing Act (1989), which introduced a statutory power for local authorities to engage in economic development through the production of a local economic plan (Sellgren, 1991). At the same time, when business rates were nationalised in 1990, this removed any fiscal incentive to favour employment space over housing. This contrasts with other European countries like France, where local business taxes make up 48% of local revenues (McGough and Bessis, 2015: 8).

As globalization took hold, Turok (2004) argues the rise of new economic powers signaled an irreversible transfer of traditional manufacturing production away from the industrialized countries of the west and economic development strategies focused more on economic 'competitiveness' and growth in already successful regions and cities, working with - rather than against - the forces of agglomeration. This shifted the emphasis of policy away from supply side interventions and towards the provision of infrastructure and housing, to attract highly skilled workers and meet the demands of businesses in already successful places (see Jonas et al, 2010; Peck, 2005). The London Plan's approach (GLA, 2011, 2015) has been to support areas of specialization and growth sectors, in particular financial and business services, and more recently the creative and tech industries, leading to a focus on the infrastructure required to support these sectors and a valorization of housing for their workers. This has been at the expense, argues Taylor (2013), of the delivery of affordable housing and the retention of jobs supporting London's diverse economies. In 2015 the Chancellor announced that local authorities would retain all business rates by 2020. Government grants, currently funded from the transfer of rates to the centre, will be abolished and local authorities will be empowered to reduce business rates to support growth. At the time of writing, details have yet to be decided; proposals are being taken forward through the Local Growth and Jobs Bill but it is anticipated changes will alter the fiscal incentives for local authorities in promoting land use changes.

#### *Planners as champions of mixed use and sustainability*

The promotion of residential development on employment land has also been influenced by the now dominant ideas around 'what makes a good city'. It has been more than 50 years since Jane Jacobs argued that an urban environment with a mix of uses is key to achieving a good city (Jacobs, 1961), and it was many decades before these principles came to drive urban policy. In addition to economic restructuring allowing for a new, workable typology, the rise of the environmental sustainability agenda was an important catalyst for mixed use being adopted as a principle in urban policy. The publication of the European Commission's Green Paper on the Urban Environment (CEC, 1990) made a strong environmental case for following the traditional European model of mixed use and compact cities. This informed the UK Government's Planning Policy Guidance 12 (DoE, 1992a), which represents the first formal acknowledgement of the connections between land use and sustainable development (Walker, 1997). Since then, mixed use development has been promoted by successive governments of all political parties. The concept of mixing land uses and promoting higher density was key to achieving New Labour's urban renaissance and a pre-requisite to achieving the housing-led regeneration envisaged. In the US, it has been central to both the 'new urbanism' and 'smart growth' movements. In many places, it is now the 'norm' rather than the exception (Foord, 2010).

Proponents of “the industrious city” have embraced the potential of mixed use as an opportunity to bring more industrious activities into our cities:

There is an opportunity to move away from the rooted practice to design these sectors out of our towns and cities. Let’s make them visible again and stop housing them in anonymous sheds. Let’s re-appropriate industrial estates and districts through raising the quality of their design and maintenance. As a result, local communities could have a better understanding of how their local economy is formed and develop a sense of ownership (Urban Design Group, 2014).

However, Grant (2002) observes that although commercial, office, retail, institutional and residential uses feature prominently in discussions about mixed use, industrial activities are less commonly included. In fact “[p]lanners see industrial uses as less desirable and perhaps incompatible with other uses in the postindustrial city”(p.74). Viewed from this perspective, mixed use policies may be acting to design out industrial uses from the city.

Empirical research on the outcomes of mixed use developments with workspace suggests it is difficult to turn mixed use policy into real mixed use outcomes and existing businesses rarely benefit. Mixed use developments have high levels of ground floor commercial vacancy (Giddings and Craine, 2006; and Evans et al, 2009; both cited in Foord 2010), which persists because commercial space tends to be of relatively poor quality, in the wrong location for employers seeking prime office space, not fit-for-purpose to meet the requirements of small businesses, and unattractive to industrial occupiers due to the proximity of housing (Renaisi, 2003; Ancer Spa, 2006). The commercial space coming forward is often ill thought through by residential-led developers with little expertise in commercial developments and the requirements of business occupiers (Ferm, 2014). In addition to the poor success of mixed use development in delivering successful workspace, Foord (2010) found that businesses in Clerkenwell, on London’s City Fringe, saw disadvantages to mixed use, primarily its potential to undermine the critical mass of businesses required for a cluster to thrive. She also documented that “recent pressure from intense residential and office development, including mixed use schemes, has hastened the redevelopment of multiple occupancy workshops and industrial spaces with the loss of many cheaper industrial and office premises” (Foord, 2010: 59). Similar outcomes have been observed in Hackney, where mixed use redevelopment of industrial premises and land has been facilitated by provision of ‘affordable workspace’; but employment floorspace lost is not remotely offset by new floorspace within redevelopments (Ferm, 2014).

Although there is now broad consensus that mixing uses as a principle of urbanism is a good thing, empirical evidence points to the problems of delivering it in practice and to the fact that there are winners and losers in the process of urban restructuring.

In the next two sections, we examine two inner London local authorities: Camden and Lewisham. Camden falls partly within the CAZ and spans London Underground Zones 1 and 2, whereas Lewisham is located south of the river Thames, outside the CAZ, in Zones 2 and 3. As shown in Figure 2, Camden has been identified as suitable for ‘restricted’ industrial land release, whereas Lewisham is suitable for ‘limited’ release.

#### 4. London Borough of Camden

The southern part of Camden has traditionally been a secondary office location located between the West End and the City of London. This is fast changing. Jobs in Camden were predicted to grow by 31% between 2011-2031, due to strategic redevelopments at Kings Cross and Euston (URS, 2014). The location of Google, the Central St Martin's campus of the University of the Arts London and the Crick Institute in Kings Cross suggests the centre of gravity of London's employment might be shifting and expanding.

The borough has also seen a 34% increase in its annual housing targets between 2011 and 2015<sup>10</sup> - higher than the London average increase of 31%. Projected growth in office employment and housing is putting pressure on the borough's industrial stock. The borough lost more than 40% of its industrial floorspace over the years 2000-2012 (Deloitte, 2014). So far, most of this loss has been from non-designated sites and despite some stabilization between 2006-10, there is evidence that loss has accelerated since 2011 (AECOM, 2016: Appendix C). Camden is attractive to businesses supplying Central London with goods and services that have a short 'shelf-life'. The borough has low stocks of industrial floorspace compared to other inner London boroughs, with high rents as a result of constrained supply, rather than low demand, as well as low vacancy rates of 2.3% in 2011 (Roger Tym & Partners, 2011, 2008a; URS, 2014).

Camden's Core Strategy<sup>11</sup> (LB Camden, 2010a: 82) includes relatively strong measures to support Camden's industries by:

- safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; and
- safeguarding the borough's main Industry Area<sup>12</sup>.

The main Industry Area is in Kentish Town and includes sites north and south of the railway (see Figure 3). The Core Strategy states that "[d]evelopment should not prejudice the nature of the Industry Area by introducing inappropriate or conflicting uses" (ibid: 84). Justifications include the fact that "Camden has strong trading links with London's Central Activities Zone (CAZ) and the borough's industrial warehousing businesses provide it with a range of vital goods and support services" and that premises "suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at high risk of being unemployed or workless" (ibid: 83). The Core Strategy also acknowledges the importance of protecting industrial sites and premises since:

[t]here has been pressure to redevelop the borough's stock of land used for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once employment land in the borough has been developed for an alternative use it is very unlikely it will ever be returned to industrial use.

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<sup>10</sup> Sources: Annex Four of the London Plan (GLA, 2011, 2015)

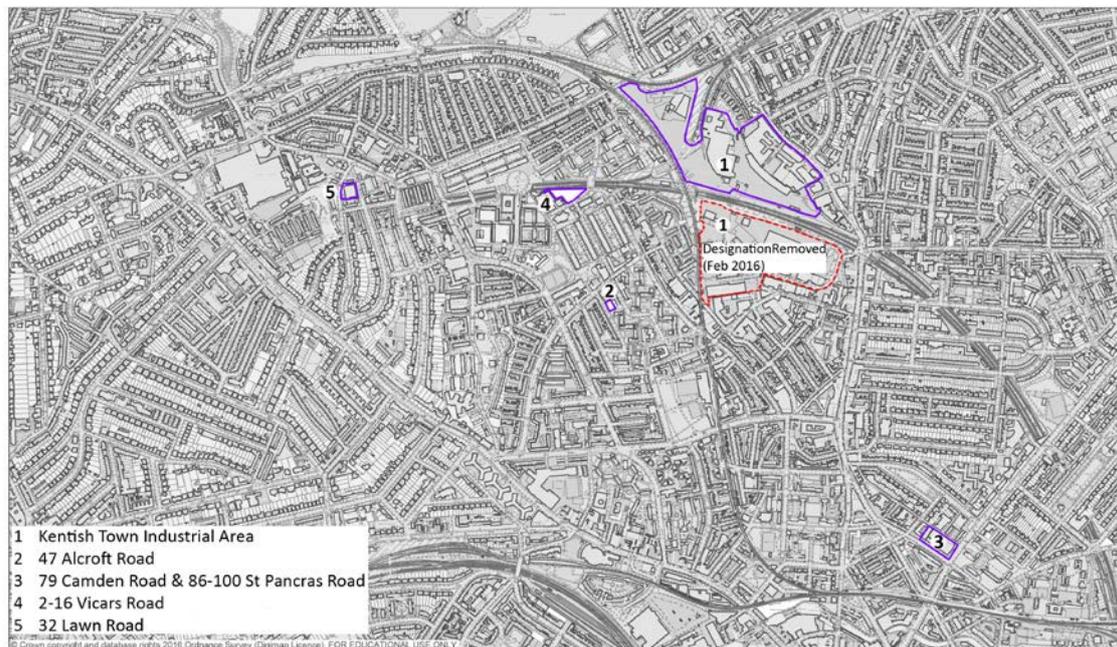
<sup>11</sup> Local authorities' strategic planning framework was renamed the 'Core Strategy' after 2004 but since 2011 most authorities have reverted to the term 'Local Plan'.

<sup>12</sup> This is a Locally Significant Industrial Site (LSIS). Camden does not have any Strategic Industrial Land (SIL).

There has been virtually no new provision of such premises in the borough for many years.” (ibid: 83)

Despite this statement and subsequent evidence that further employment sites have been lost (Roger Tym & Partners, 2011), the submission draft of the Local Plan (LB Camden, 2016a) proposes Kentish Town as a new ‘growth area’, whose aim is to resist “development that makes inefficient use of Camden’s limited land” by increasing densities and promoting “a mix of uses” and “high quality development” (ibid: 16). The growth area is achieved by de-designating part of the Industry Area at Regis Road illustrated in Figure 3. The Council expects “a comprehensive employment-led development at Kentish Town Regis Road that provides a mix of uses, including industry, logistics and other employment uses, housing, community facilities and open space” (ibid: 29). The Council sees this as some sort of win-win solution, since at the same time, it suggests it:

will retain the Industry Area for industrial and warehousing uses... by resisting any proposals that would lead to the loss of sites in Use Classes B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature. Part of the Industry Area is in low density employment use. The Council will consider higher intensity redevelopment proposals for employment uses for the use classes identified within this paragraph.



*Figure 3: Kentish Town Industrial Area plus location of Council-owned employment sites sold to developers 2012-15*

The challenges of implementing this policy in practice are not discussed, and no precedents are cited. An obvious question follows: Why has Camden relaxed its approach to its

designated employment land, despite evidence of a constrained market and ongoing high demand for industrial space? The London Plan (GLA, 2015) has not identified Kentish Town as an Opportunity Area or Area of Intensification and, as required by the NPPF, the borough could put forward ‘strong economic reasons’ for the site to remain in employment use. We suggest three changing contexts underpinning this policy shift. First, pressure to meet the increase in housing targets since 2011 means that planners are more favourable to the redevelopment of large sites, capable of meeting housing targets quickly, of which there are comparatively few in the borough (GLA, 2014: Appendices 1-6). Second, local residents’ voices now have a greater weight through Neighbourhood Planning. The Kentish Town Neighbourhood Plan was one of the first in London to be approved. In a workshop held in 2012, residents expressed their views that there should be “better access to and through the Regis Road Estate” and that “sites should be developed to provide more employment space accommodation for businesses that may be more suited to this increasingly central London location” (Princes Foundation, 2012: 40). This suggests that businesses on the estate are considered outdated and residents would prefer employment to be higher value and more compatible with residential. The draft Neighbourhood Plan supports “the intensification of the use of the [Regis Road estate] through additionally mixed use development, including residential, offices and other uses” (Kentish Town Neighbourhood Forum, 2015: 34). Although the policy includes a criteria that employment space on the site should be increased, there is no reference to the type of employment envisaged and industrial uses are not mentioned. The workshop report acknowledges that “despite the team’s best efforts, the stakeholder event in July was not attended by representatives of the Regis Road estate.” (Princes Foundation, 2012: 42). Elsewhere in the borough, a joint resident-business forum has been established (Camley Street Neighbourhood Forum), where very different outcomes are being pursued including redevelopment of the site with industrial uses remaining in situ. This shows that where businesses have equal representation to residents, more positive outcomes can be achieved.

A third important context is that Camden faces a £403 million funding gap for essential improvements to homes, schools and community facilities, and is looking to the disposal of its land and property assets to meet budget shortfalls through its Community Investment Programme (LB Camden, 2015). Of the borough’s industrial stock, 53% is owned by Camden (Deloitte, 2014). The borough has seen four of its sites sold to housebuilders since 2012 (see Figure 3). Table 2 shows these sites were predominantly sold for housing redevelopment, losing approximately 11,500 sq m employment floorspace. In two cases, this was despite recommendations in a Council commissioned consultants’ report that industrial space should be re-provided either on site or as part of a wider masterplan.

The sites have been acquired by volume housebuilders rather than specialist developers well versed in mixed use redevelopment. The developers stress the prestige and exclusivity of the new apartments being constructed<sup>13</sup>, and only one of the schemes includes any employment floorspace (286 sq m). Figure 4 shows the Allcroft Road site before and after redevelopment.

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<sup>13</sup> The websites for these developments can be viewed at <http://www.barratthomes.co.uk/new-homes/greater-london/h628601-camden-courtyards/>, <https://www.fairview.co.uk/find-your-home/lawn-road/> and <http://www.telfordhomes.london/microsites/the-town-apartments/index.cfm>

Site address	Previous use	Consultants' recommendations (2012)	Scheme details	Net loss B1-class employment floorspace (sqm)
47 Allcroft Road, NW5	4 light industrial units. Tenants vacated premises since the purchase.	N/a	Approval in 2014 for 4-storey residential building with 18 flats.  Developers: Telford Homes Under construction (late 2015).	290
79 Camden Road and 86-100 St Pancras Way, NW1	B1(a) office, previously light industrial. Vacant.	N/a	Approval in 2014 for 7-storey residential development with 164 flats.  Developers: Barratt Homes Completed Jan 2016.	7,188
2-16 Vicar's Road (within Bacton Low Rise regeneration), NW5	16 light industrial units at Vicars Road (922 sqm). 14 of 16 units occupied in 2012.  District housing office (2,529 sqm) was occupied.	Redevelop as part of wider Gospel Oak regeneration. Re-provide industrial space as part of a wider masterplan. Pending wider regeneration, safeguard for industrial use.	Approval in 2013 for a 3-5 storey residential scheme with 290 flats, 286 sqm (3 units) employment floorspace on site and refurbishment of nearby workshops.  Under construction (late 2015).	3,165
32 Lawn Road, NW3	7 light industrial units above a car park. 5 units were occupied in 2014.	Sell site for residential use. Re-provide employment space on site.	Approval in 2015 for 7-storey residential development with 72 flats.  Developers: Fairview Under construction (late 2015)	630

*Table 2: Redevelopment of employment sites in Camden Council's property portfolio since 2012. (Sources: London Borough of Camden ([planningrecords.camden.gov.uk](http://planningrecords.camden.gov.uk)); Roger Tym & Partners, 2012; Freedom of Information request by Tom Young Architects.)*



*Figure 4: Allcroft Road before and after redevelopment [Source: Google street view and developer's website: <http://www.telfordhomes.london>]*

These outcomes include little employment despite the Council having more control over the outcome on these sites than on privately-owned sites. This suggests it is unlikely healthy levels of employment will be achieved in the redevelopment of the Kentish Town Industrial Area, despite the new Local Plan's insistence that the new redevelopment must retain local businesses on site as far as possible (LB Camden, 2016a: 29), an In fact, there is much speculation over the future of the Industry Area and an article in a local newspaper claims that a large property developer has already been attempting to negotiate with local businesses to buy up their premises and amalgamate a site large enough for redevelopment (McLennan, 2015).

In Camden, this study has revealed three contexts underpinning a shift in policy with respect to the borough's remaining employment land: A substantial increase in the borough's annual housing targets; the establishment of a resident-led Neighbourhood Forum and Plan in the area where most of the borough's remaining industry is concentrated; and a political commitment to selling off Council owned industrial sites as part of a borough-wide Community Investment Programme. These drivers are different to those in the London Borough of Lewisham – considered next – where there are no approved Neighbourhood Forums to date and the Council has not made such an explicit commitment to selling off its assets. Nevertheless, there has been a similar shift in policy stance, the reasons for which will now be discussed.

## 5. London Borough of Lewisham

Within easy reach of central London and Canary Wharf, Lewisham offers locational advantages for a range of occupiers. Local business stakeholders reveal that the borough is considered cheap and centrally located, but concerns have been raised about the availability of suitable industrial premises, the prevalence of short-term leases and perceptions of the area (Roger Tym and Partners, 2008b).

Between 2000 and 2012, the borough lost 32% of its industrial floorspace, from 568,000 to 386,000 sq m<sup>14</sup> - substantially more than the average for London (17.3%) and East London (19.7%) (LB Lewisham, 2013a). Unlike Camden, where loss has been concentrated outside designated sites, Lewisham has lost employment land in all categories, including its locally and strategically protected sites (AECOM, 2016: Appendix C). This is despite a planning policy framework designed to safeguard employment sites for most of this period. In 2004, the borough recognised it “does not have large areas of land devoted to business use and in order to facilitate a broad based local economy it considers it necessary to protect viable business land from a change of use away from business activity” (LB Lewisham, 2004: Chapter 7, para 11) and that:

“by protecting viable employment land from redevelopment for other uses the fundamental building blocks for *regeneration* are put in place. Lewisham has high unemployment and the potential for local jobs is provided if existing firms expand or new business is attracted into the area.” (ibid: para 15, our emphasis).

A number of Defined Employment Areas were identified where non-employment uses were “not normally” granted permission (Policy EMP3). Outside these areas, non-employment uses would only be approved if applicants could justify the loss of employment according to a number of criteria (Policy EMP4).

Vacancy rates of industrial stock in Lewisham dropped significantly between 2010 and 2015, from 14.2% to 5.6% (AECOM, 2016: Appendix C). Even when vacancy rates were higher, stakeholder workshops suggested there were “shortages of stock in a highly constrained market that provides little choice either to local, growing companies, or to companies considering locating to the area from elsewhere” (Roger Tym and Partners, 2008b: 36). Consultants suggested a mismatch between what Lewisham’s relatively small stock of industrial premises offers and what occupiers demand: “[W]hile the Borough’s commercial property market is failing to create suitable new stock, choice for occupiers is shrinking and a spiral of decline is evident in which it will lose critical mass as a business location – if it has not already done so.” (ibid, 37). The key issue for Lewisham’s commercial property market was identified as:

“the apparently insatiable appetite for new housing, which...is one of the principal causes of the decline of industrial stock. Residential development can outbid

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<sup>14</sup> From Valuation Office Agency data, available at <http://data.london.gov.uk/dataset/commercial-and-industrial-floorspace-borough>

industrial values by a factor of two or three, and many borough councils have been unable to save industrial land as they have struggled to meet the GLA's housing targets." (ibid: 46-7)

The Lewisham Business Growth Strategy suggests that a lack of premises is a weakness (LB Lewisham, 2013a: 18). However, in the Core Strategy (LB Lewisham, 2011: Policy 4), six of the 23 Defined Employment Areas were given a new *Mixed Use Employment Location* (MEL) designation (see Figure 5), whereby only 20% of the floorspace is required to be in employment use (LB Lewisham, 2011: Policy 4).

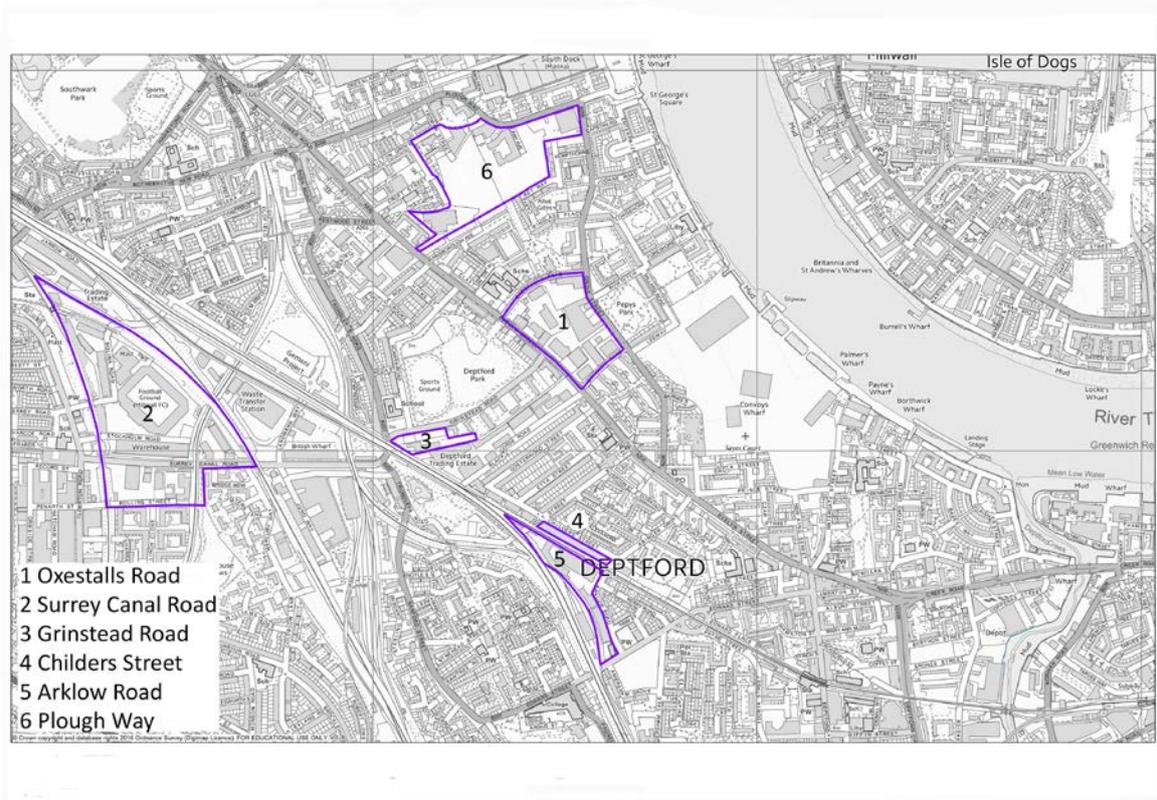


Figure 5: Lewisham Mixed Use Employment (MEL) sites (previously Defined Employment Areas). Adapted from LB Lewisham (2011: Figure 6.2)

An insight into the Council's change of perspective can be gleaned from consultation on the strategy:

"The proposed MELs... are considered to represent areas of older and poorer quality industrial use of low densities. Some have suffered from piecemeal development that disrupts the continuing industrial functioning of the area and others have been occupied by uses incompatible with adjoining residential areas... On balance, the Council considers that the sites present opportunities for *regeneration* which far outweigh retention as existing industrial uses." (LB Lewisham, 2007: 188)

More detail on how *regeneration* would be delivered is provided in the consultation on the Core Strategy options report:

“The Mixed Use redevelopment (including housing) of some of these sites... could provide new employment in small business units and other types of uses that could boost the local economy and provide regeneration benefits, improving the image of the location as a whole as a place for business.” (LB Lewisham, 2008: 122)

This statement suggests that the Council sees provision of small business workspace as a potential catalyst for further investment, a form of employment-led regeneration. However, by the time of the publication of the Core Strategy, the emphasis is more generally on attracting investment, which arguably could be in the form of housing development:

A fundamental objective and requirement of the redevelopment of these sites is the need to deliver a radical improvement in the physical quality of the urban environment by improving their overall appearance and attracting further investment to a part of the borough where the environment is poor and unemployment and levels of deprivation are high.” (LB Lewisham, 2011: 49)

The pressure on planners to deliver housing targets appears to become more acute and clearly affects both emerging policy and decisions on planning applications. Between 2011 and 2015, Lewisham saw a 25% increase in its annual housing targets<sup>15</sup>. As the Council acknowledges: “the planning system is driven almost entirely by the need to provide housing” (LB Lewisham, 2014: 7) and “the opportunity to provide new housing in a highly developed borough is limited, so reviewing opportunities to better use underused employment areas and town centres as housing locations is necessary” (LB Lewisham, 2011: 3).

Table 3 reveals that all but one of the new MELs are being redeveloped under a single planning application, with housing as the primary focus. In more than half the cases, there is a net gain of ‘non-residential’ floorspace, which might be argued to offset the loss of industrial floorspace, but none of this floorspace is proposed for industrial use, suggesting a change in nature of the jobs to be accommodated.

Site address	Previous use	Scheme details	Loss of B2-B8 employment floorspace (sqm)	Net change non-residential floorspace (sqm)
Oxestalls Road MEL	Industrial uses, including metal recycling, car breaking and repair	Approval in 2012 for 905 residential units and 16,393 sq m of non-residential floorspace (none of this floorspace is B2 or B8). Developers: Lend Lease. Not yet commenced (2016)	14,000	+2,393

<sup>15</sup> Source: Annex Four, London Plan (GLA, 2011, 2015)

Surrey Canal Road MEL (part not formerly DEA)	Industrial units, Millwall FC	Approval in 2012 for up to 2,500 residential units and up to 63,200 sq m of non-residential floorspace (none of this floorspace is B2 or B8).  Developers: Renewal.	17,587	+45,723
Grinstead Road MEL,	General industrial (B2) use	Approval in 2012 for 199 residential units and 1,973 sq m of B1 and A3 commercial floorspace.  Developers: Galliard Homes. Commenced 2015.	1,624	+347
Childers Street MEL	Local church and building contractors	Approval in 2014 for 83 residential units and 1,243 sq m of B1/ D1 commercial floorspace.  Developers: Aitch Group. Commenced 2015.	5,230	-3,987
Arklow Road MEL	Industrial and warehouse units in B2/ B8 use	Approval in 2016 for 316 residential units and 2,794 sq m of flexible commercial space (none of this floorspace is B2 or B8).  Developers: Anthology	7,100	+4,306
Plough Way MEL	Industrial (B2/ B8) and office uses	Four planning consents granted, which cumulatively account for 1,427 residential units and 11,767 sq m of non-residential floorspace (none of this floorspace is B2 or B8).  Several developers, including Berkeley Homes and Barratt. Development underway	Unclear from information available.	Unclear from information available.

*Table 3: Proposals for redevelopment in Lewisham's new Mixed Employment Locations, formerly Defined Employment Areas. (Sources: London Borough of Lewisham planning records, LB Lewisham, 2013b, 2011, 2004)*

Further investigation was undertaken to ascertain the potential outcomes of developments on completion. To facilitate the delivery of housing, the London Plan designated two Opportunity Areas, incorporated by Lewisham into a large 'Regeneration and Growth Area' stretching from Deptford and New Cross in the north to Lewisham and Catford in the south. The area has the potential to deliver 14,975 new homes, accounting for 82% of the borough's forecast housing growth (LB Lewisham, 2011: 48). All the new MELs fall within this area. In February 2015 it was announced that Surrey Canal would be one of the Mayor's new Housing Zones (LB Lewisham, 2015). Although the planning application (see Table 3) includes non-residential uses, no industrial uses are planned in the redevelopment and the developers are explicit in making a break from the past in their branding of the development on their website<sup>16</sup> which states: "Bye Bye Surrey Canal, Hello New Bermondsey". In order to make way for the proposed redevelopment, thriving businesses near and around the Millwall Stadium were required to relocate following the expiry of their leases<sup>17</sup>. Whether or not Lewisham will succeed in its ambition to become a more attractive place for business, whilst at the same time delivering on these ambitious housing targets remains to be seen.

At Arklow Road, industrial occupiers do not feature in the redevelopment, despite the Council's observation before the site was acquired for redevelopment that "[m]ost of the buildings on the site are occupied by industrial commercial users, and in their current state are capable of continued industrial use. One of the occupiers is one of the borough's largest employers" (LB Lewisham, 2007: 193). Similarly, the Employment Land Study found that the area had "a reasonably dense concentration of economic activity which shows signs of investment and growth" (Roger Tym and Partners, 2008b: Annex 1, 16). However, the Site Allocations document stated "[t]he introduction of residential development would mean that industrial uses are no longer compatible and would require their replacement by predominantly office based or light industrial/workshop uses" (LB Lewisham, 2013b: 41). This provided guidance to the developer, Anthology, for the preparation of their site masterplan, which anticipates 320 new homes and 25,000 sq ft of commercial space. In its consultation, Anthology asked what commercial uses the public would like to see on the site, giving the limited options: 'offices, nursery, studios, dentist, shops, storage, cafes, launderette' (Anthology, 2015). Notably workshops or light industrial premises are absent from the options, but this is unsurprising given the policy direction. Figure 6 provides an illustration of the site before redevelopment and the developers' proposals.

Lewisham Council's push for mixed use redevelopment of its industrial sites was driven initially by a desire to deliver 'regeneration' and the upgrading of employment in the borough. However, this emphasis on employment has taken a back seat as annual housing targets were further increased, and housing came to be seen as a way to improve the attractiveness of the borough and attract investment. The Council's more recent planning policies do not take into account their own commissioned evidence on the value of existing uses and the prospects of Lewisham's industrial sites. Indeed, the current policy framework allows (in theory) the vast majority of new floorspace on these sites to be provided as housing, and discourages the integration of existing industrial uses into the urban fabric.

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<sup>16</sup> <http://www.newbermondsey.com/>

<sup>17</sup> Informal communication with proprietor of Kaymet manufacturers, operating in Bermondsey since 1947.



*Figure 6: Arklow Road site before redevelopment (top) and proposed scheme (below).  
[Source: Developer's scheme Design and Access statement (p.55) and website  
<https://anthology.london/>]*

## **6. Conclusion**

This paper has argued that the designation of many of London's industrial sites for mixed use redevelopment is not simply a practical response to deindustrialization. Rather, as has already been observed in New York, changes in policy are fuelling speculation for housing redevelopment on sites occupied by viable businesses, thereby supporting and accelerating the trend of deindustrialization. Local planning authorities in the UK are now operating in a political climate that is moving towards deregulation with a presumption in favour of development stipulated in national policy, but changes in planning policy at the local level go beyond that required by national or regional policy guidance. Through an examination of two London boroughs, we have gained an insight into these policy changes, the drivers for change, and some early indication of outcomes on the ground. The pressure to meet ever-increasing housing targets is evident, but in Camden it appears that the context of austerity politics, coupled with the increasing influence of local residents through the Neighbourhood Planning process, has served to weaken planners' previous stronger position on protecting remaining employment land. In Lewisham, justifications for the borough's planning policies have long referred to the need to support regeneration; while employment was previously understood to be one of the fundamental building blocks, there has been a shift towards a housing-led approach to regeneration, whereby the release of industrial sites is key to

delivering housing targets. Housing is now seen as part of the package of support for economic growth, required to attract skilled workers in high-growth sectors, which supports an economic growth agenda at a London scale, rather than a local one.

The research also illustrates tensions between aspirations to create a more mixed city, moving away from the separation of land uses, and the realities of delivering change on the ground. Early indications suggest that the approach pursued in London is unlikely to deliver any substantial employment. Planning policy on its own is failing to deliver the mix of uses that could meet such aspirations. Pressures to meet housing targets mean there is little political will to enforce requirements for developers to deliver employment at the expense of more housing. Merely designating a site as 'mixed use' is unlikely to deliver mixed use in practice. Ironically, as local authorities are busy trying – and failing - to increase mixing through the deregulation of parcels of employment land, we are at the same time losing the fine grain of mixing that has been a natural feature of the city, a consequence of failed 20<sup>th</sup> Century attempts to remove non-conforming uses from residential areas and town centres (Coupland, 1997). Even if it were achieving more success, the benefits of mixed use (at that scale) need to be balanced with the function of employment land in protecting lower-value commercial uses from competition with housing.

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