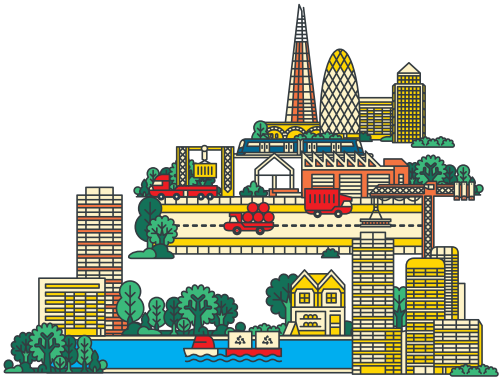
Chapter 6

Economy



Policy E1 Offices

A Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.

B Increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.

C The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and other nationally-significant office locations (such as Tech City, Kensington & Chelsea and the Royal Docks Enterprise Zones), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central London, the UK and beyond.

D The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:

1) the strategic outer London office location at Croydon town centre
2) other town centre office locations (see Town Centre Network office guidelines in Figure A1.4)
3) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations
4) locally-oriented, town centre office provision to meet local needs.

E Existing viable office floorspace capacity in outer and inner London locations outside the CAZ and NIOD should be retained, supported by borough Article 4 Directions to remove permitted development

rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses (see Policy SD9 Town centres: Local partnerships and implementation and office guidelines in Figure A1.4).

F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, the Royal Docks Enterprise Zones, Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations – see part D.3 above) are not undermined by office to residential permitted development rights.

G Development proposals should:

1) take into account the need for lower cost and affordable workspace (see Policy E2 Low-cost business space and Policy E3 Affordable workspace)
2) examine the scope for the re-use of otherwise surplus large office spaces for smaller units
3) support the redevelopment, intensification and change of use of surplus office space to other uses including housing.

6.1.1 London has a **diverse range of office markets** with agglomerations of nationally and internationally significant office functions in the Central Activities Zone, Northern Isle of Dogs, Kensington & Chelsea and Tech City, complemented by strategic town centre office locations in inner and outer London and locally-oriented provision in other town centres across the whole of the capital.

6.1.2 The office market is going through a **period of restructuring** with increasing numbers of micro, small and medium-sized enterprises (SMEs), changing work styles supported by advances in technology, and new forms of accommodation such as flexible and co-working space[71]. Office employment projections suggest an increase of 619,300 jobs, from 1.98

[71] Ramidus Consulting. London Office Policy Review. GLA, 2017. URS, Ramidus, #1Seed and Gort Scott, Supporting places of work: incubators, accelerators, co-working spaces, GLA, 2014

million in 2016 to 2.60 million in 2041, a rise of 31 per cent[72]. This could translate into demand for between 4.7 and 6.1 million sqm of office floorspace over the period 2016 to 2041 (Table 6.1). It is important that the planning process does not compromise potential growth and so Table 6.1 provides a broad monitoring benchmark which needs to be set against other drivers such as development trends, employment densities, rents, take-up and vacancy.

Table 6.1 - Projected office employment and floorspace demand 2016-2041

Location	Office employment growth 2016-2041		Office floorspace demand 2016-2041
	Total	% of total growth	Gross Internal Area (million sqm)
Outer London	142,200	23%	0.3 – 1.5
CAZ and NIOD	367,700	59%	3.5
Inner London (outside CAZ+NIOD)	109,400	18%	1.0 – 1.1
London total	619,300	100%	4.7 – 6.1

Source: Ramidus Consulting, 2017 (Note: numbers may not sum due to rounding)

6.1.3 The projections indicate that the CAZ boroughs and some parts of **inner London** will continue to see growth in office employment and development of new office floorspace, driven by agglomeration economies, high value-added activities and viability of new space. There is broadly sufficient capacity to accommodate this demand in the CAZ and Northern Isle of Dogs[73] complemented by Tech City and Kensington & Chelsea with Stratford and Old Oak Common identified as potential future reserves for CAZ-related office capacity.

6.1.4 **Outer London** will see growth in office employment but the development of significant new office floorspace is anticipated to be focused in selected locations, particularly in west and south London (Figure A1.4) and where values are sufficient to make new office development viable.

72 Ramidus Consulting 2017 op cit

73 CAG Consulting. London Employment Sites Database, GLA, 2017 and Ramidus 2017 op cit.

Office growth in these locations should be supported by improvements to walking, cycling and public transport connectivity and capacity.

6.1.5 It is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Development Plans and development proposals should support the provision of **space suitable for SMEs** in light of strategic and local assessments of demand and supply.

6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1.6 million sqm of office space had received prior approval to change to residential by March 2016[74] mostly, but not exclusively, in town centres in west and south London and in areas around the CAZ fringe. There are concerns that **office to residential PDR** is having disproportionate impacts on occupied office floorspace and on SMEs and that it could undermine the potential to deliver significantly more housing through more intensive forms of mixed-use development, particularly in town centres. This Plan therefore supports boroughs to consult upon and introduce Article 4 Directions for the areas currently exempted in and around the CAZ (see Policy SD2 Collaboration in the Wider South East) and for geographically-defined parts of other existing and viable strategic and local office clusters, to ensure that their office functions are not undermined by office to residential PDR.

Policy E2 Low-cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.

B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or

74 Source: London Development Database

2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or

3) demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

6.2.1 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To deliver a diverse economy, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. Ensuring a **sufficient supply of business space** of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

6.2.2 **Low-cost business space** refers to secondary and tertiary space, which is of a lower specification than prime space[75]. It is often found in locations such as back-of town centre and high street locations, railway arches, heritage buildings in the CAZ, and smaller-scale provision in industrial locations. It usually commands rents at or below the market average.

6.2.3 There is evidence that the conversion of occupied or partially-occupied offices to residential use, through **permitted development rights**, is having a particular impact on secondary space in outer London and on the fringes of the CAZ[76]. This policy is intended to operate in those parts of London where there are particular cost pressures and a shortage of lower-cost secondary or tertiary space available for occupation. It will be most effective in those parts of London where boroughs have removed office or

75 See Glossary for definitions of prime, secondary and tertiary commercial property

76 Ramidus Consulting 2017 op cit / London Development Database monitoring

light industrial to residential permitted development rights through Article 4 Directions.

6.2.4 Where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the **intensification or reconfiguration of space**. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

6.2.5 Larger-scale commercial development proposals should consider the scope to incorporate a **range of sizes of business units**, including for SMEs. Flexible workspace can include a variety of types of space including serviced offices and co-working space[77]. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.

6.2.6 If business space is demonstrated to be obsolete or surplus to requirements, it should be **redeveloped for housing and other uses**. Evidence to assess the reasonable prospect of workspace being used for business purposes should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). This evidence should be used to inform viability assessments.

[77] Ramidus Consulting 2017 op cit section 2.3

Policy E3 Affordable workspace

A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

1) dedicated for specific sectors that have social value such as charities or social enterprises
2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
3) dedicated for disadvantaged groups starting up in any sector
4) providing educational outcomes through connections to schools, colleges or higher education
5) supporting start-up businesses or regeneration.

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:

1) where there is existing affordable workspace on-site
2) in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)
3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

C Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently.

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in part A, over the long term.

F The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.

6.3.1 Affordable workspace is defined here as workspace that is provided at **rents maintained below the market rate** for that space **for a specific social, cultural, or economic development purpose**. It can be provided directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.

6.3.2 Affordable workspace may **help support educational outcomes**, for example by businesses providing apprenticeships and work experience, offering mentoring by entrepreneurs and/or providing space for further and higher education leavers to develop academic work into businesses. It may also be linked with business support and skills training.

6.3.3 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have **cultural or social value** such as artists' studios, designer-maker spaces and charities or social enterprises for which low-cost space can be important. Therefore, in certain specific circumstances, as set out in part A, there may be a need to secure affordable workspace as part of new development.

6.3.4 The Mayor will encourage the delivery of new workspace for SMEs, the **creative industries, artists and the fashion industry** within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones (see Policy HC5 Supporting London's culture and creative industries) and promote schemes that provide linked affordable housing and business space in new housing developments.

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).

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[78] - see below.

C The retention and provision of industrial capacity across the three categories of industrial land set out in part B 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 operational yard space capacity) within designated SIL and LSIS. 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.

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
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.

78 Sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan

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, 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, vehicle maintenance and repair, building 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[79].

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.

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[80] 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 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**

79 SEGRO, Keep London Working, 2017; Turley. Industrial Revolution, 2017

80 AECOM. London Industrial Land Supply and Economy Study, GLA, 2016

to other uses. This was well in excess of previously established London Plan monitoring benchmarks[81]. Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041[82], 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 on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio[83] (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.

6.4.6 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[84]. 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

81 AECOM 2016 op cit

82 CAG Consulting, London Industrial Land Demand Study, GLA 2017

83 Source: London Employment Sites Database, GLA Economics, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites

84 CAG Consulting, 2017 op cit

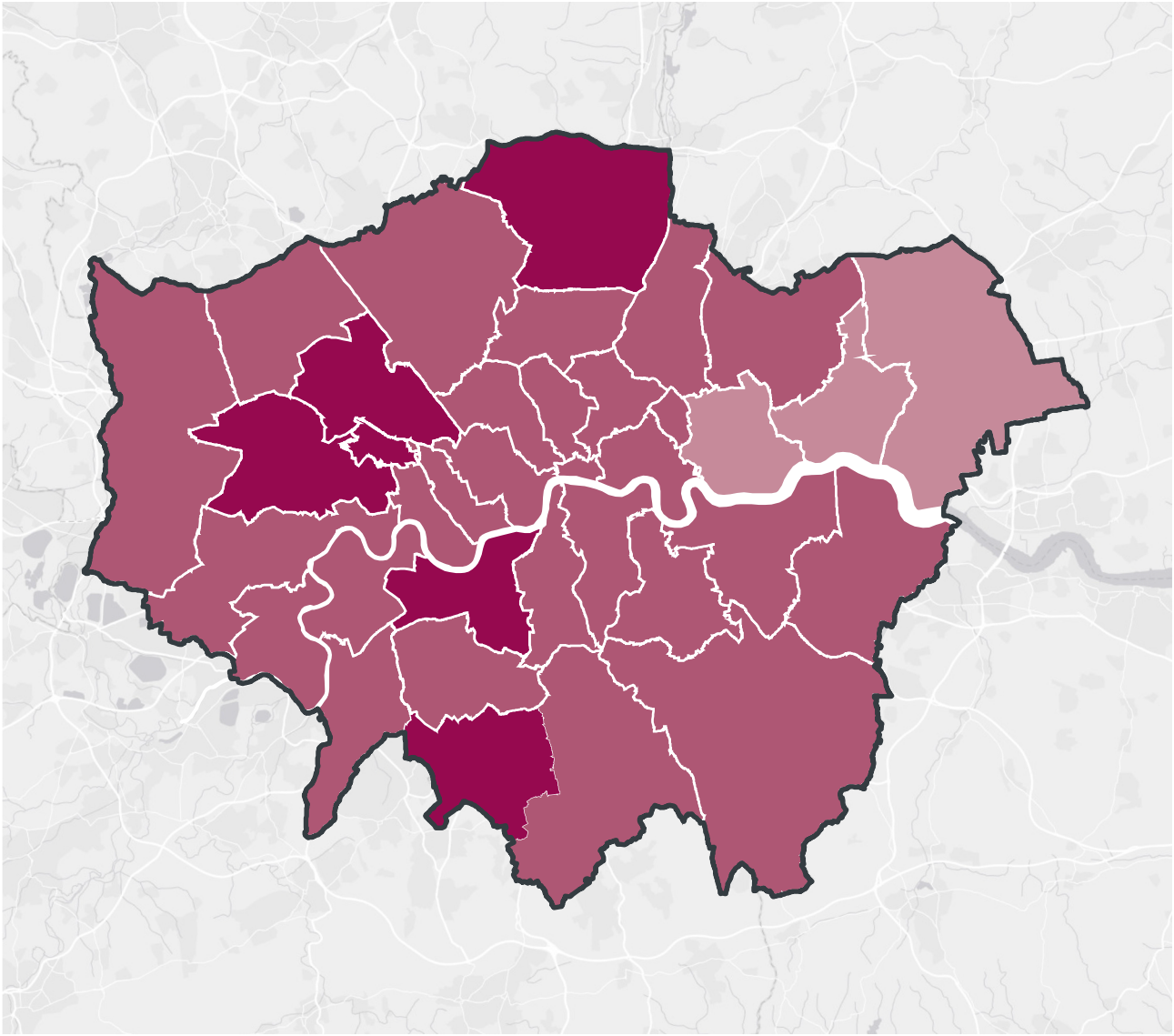
fall within this category in recognition of the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.

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.

Table 6.2 - Management of industrial floorspace capacity - industrial property market area and borough-level categorisations

Property Market Area / Borough	Categorisation
Central Services Area	
Camden	Retain capacity
City of London	Retain capacity
Hackney	Retain capacity
Islington	Retain capacity
Kensington & Chelsea	Retain capacity
Lambeth	Retain capacity
Lewisham	Retain capacity
LLDC	Retain capacity
Southwark	Retain capacity
Tower Hamlets	Retain capacity
Westminster	Retain capacity
Thames Gateway	
Barking & Dagenham	Limited release
Bexley	Retain capacity
Bromley	Retain capacity
Greenwich	Retain capacity
Havering	Limited release
Newham	Limited release
Redbridge	Retain capacity
Lee Valley	
Enfield	Provide capacity
Haringey	Retain capacity
Waltham Forest	Retain capacity
Park Royal/Heathrow	
Barnet	Retain capacity
Brent	Provide capacity
Ealing	Provide capacity
Hammersmith & Fulham	Retain capacity
Harrow	Retain capacity
Hillingdon	Retain capacity
Hounslow	Retain capacity
OPDC	Provide capacity
Richmond	Retain capacity
Wandle Valley	
Croydon	Retain capacity
Kingston	Retain capacity
Merton	Retain capacity
Sutton	Provide capacity
Wandsworth	Provide capacity

Figure 6.1 - Management of industrial floorspace capacity - borough level categorisations



Management of Industrial Floorspace Capacity
Borough Level Categorisations

- Provide Capacity
- Retain Capacity
- Limited Release

Source: GLA Planning

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 main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.

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).

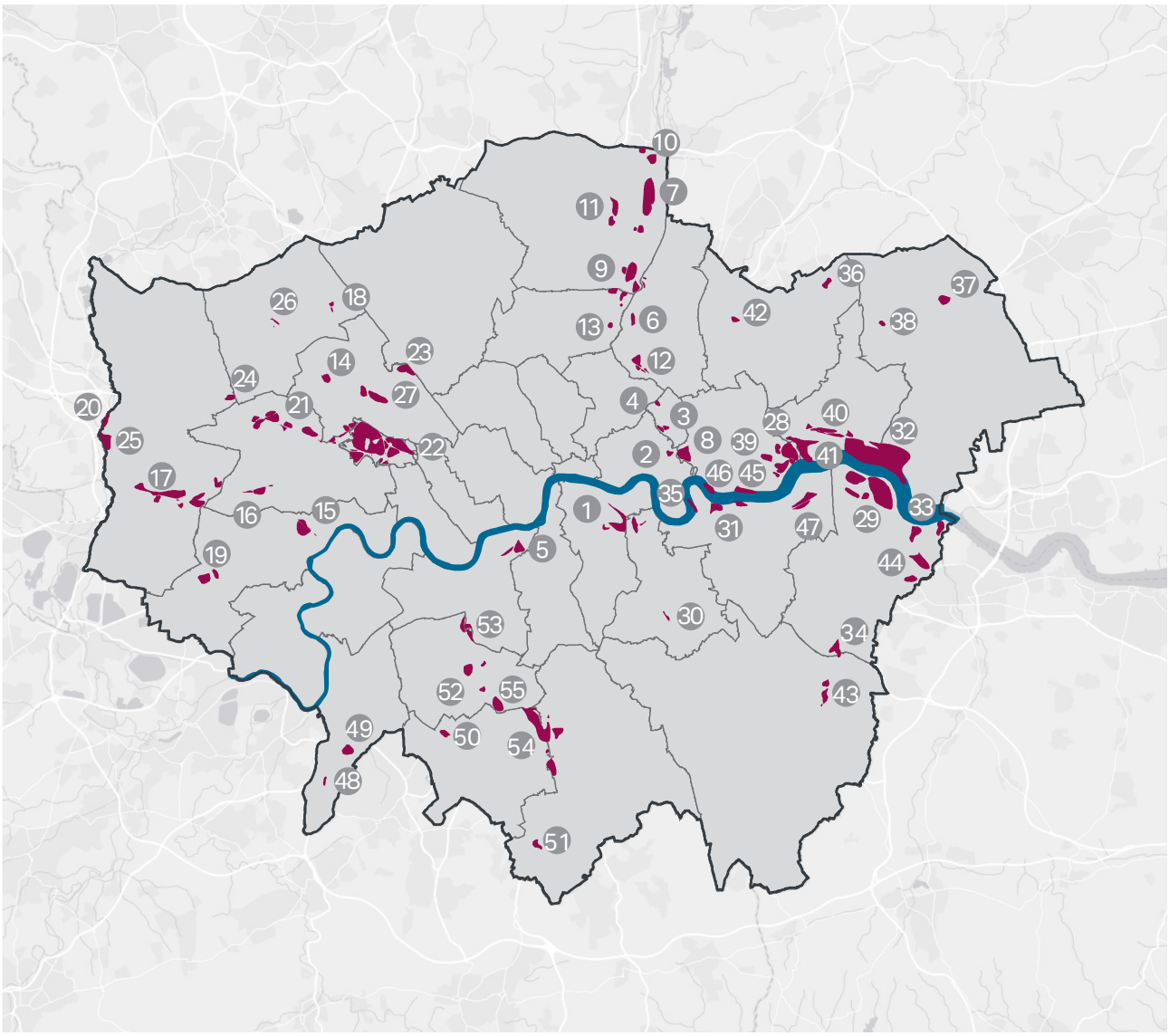
C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:

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.

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.

Figure 6.2 - Strategic Industrial Locations



Strategic Industrial Locations

● Strategic Industrial Locations (SIL)

References refer to Table 6.3

Source: GLA Planning

Table 6.3 - Strategic Industrial Locations

Ref.	Location	Industrial Property Market Area	Planning Authority
1	Bermondsey / Old Kent Road / Surrey Canal Area	Central Services Area	Southwark / Lewisham
2	Empson Street	Central Services Area	Tower Hamlets
3	Fish Island / Marshgate Lane	Central Services Area	LLDC (Newham/Tower Hamlets)
4	Hackney Wick	Central Services Area	LLDC (Hackney)
5	Queenstown Road, Battersea	Central Services Area	Wandsworth
6	Blackhorse Lane	Lee Valley	Waltham Forest
7	Brimsdown	Lee Valley	Enfield
8	British Gas Site / Cody Road	Lee Valley	Newham
9	Central Leaside Business Area	Lee Valley	Enfield / Haringey / Waltham Forest
10	Freezywater / Innova Park	Lee Valley	Enfield
11	Great Cambridge Road	Lee Valley	Enfield
12	Lea Bridge Gateway	Lee Valley	Waltham Forest
13	Tottenham Hale	Lee Valley	Haringey
14	East Lane	Park Royal / Heathrow	Brent
15	Great West Road / Brentford – Transport Avenue	Park Royal / Heathrow	Hounslow
16	Great Western	Park Royal / Heathrow	Ealing
17	Hayes Industrial Area	Park Royal / Heathrow	Hillingdon
18	Honeypot Lane, Stanmore	Park Royal / Heathrow	Harrow
19	North Feltham Trading Estate	Park Royal / Heathrow	Hounslow
20	North Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
21	Northolt, Greenford, Perivale	Park Royal / Heathrow	Ealing

Ref.	Location	Industrial Property Market Area	Planning Authority
22	Park Royal	Park Royal / Heathrow	OPDC (Brent / Ealing / Hammersmith & Fulham)
23	Staples Corner	Park Royal / Heathrow	Brent
24	Stonefield Way / Victoria Road	Park Royal / Heathrow	Hillingdon
25	Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
26	Wealdstone Industrial Area	Park Royal / Heathrow	Harrow
27	Wembley	Park Royal / Heathrow	Brent
28	Beckton Riverside	Thames Gateway	Newham
29	Belvedere Industrial Area	Thames Gateway	Bexley
30	Bromley Road	Thames Gateway	Lewisham
31	Charlton Riverside	Thames Gateway	Greenwich
32	Dagenham Dock / Rainham Employment Area	Thames Gateway	Barking & Dagenham / Havering
33	Erith Riverside	Thames Gateway	Bexley
34	Foots Cray Business Area	Thames Gateway	Bexley / Bromley
35	Greenwich Peninsula West	Thames Gateway	Greenwich
36	Hainault Industrial Estate	Thames Gateway	Redbridge
37	Harold Hill Industrial Estate	Thames Gateway	Havering
38	King George Close Estate, Romford	Thames Gateway	Havering
39	London Industrial Park	Thames Gateway	Newham
40	Rippleside	Thames Gateway	Barking & Dagenham
41	River Road Employment Area	Thames Gateway	Barking & Dagenham
42	Southend Road Business Area	Thames Gateway	Redbridge

Ref.	Location	Industrial Property Market Area	Planning Authority
43	St Mary Cray	Thames Gateway	Bromley
44	Thames Road, including Crayford Industrial Area	Thames Gateway	Bexley
45	Thameside East	Thames Gateway	Newham
46	Thameside West	Thames Gateway	Newham
47	West Thamesmead / Plumstead Industrial Area (including White Hart Triangle)	Thames Gateway	Greenwich
48	Barwell Business Park	Wandle Valley	Kingston
49	Chessington Industrial Estate	Wandle Valley	Kingston
50	Kimpton Industrial Area	Wandle Valley	Sutton
51	Marlpit Lane	Wandle Valley	Croydon
52	Morden Road Factory Estate and Prince George's Road	Wandle Valley	Merton
53	North Wimbledon / Garrett Business Park (Summerstown)	Wandle Valley	Merton / Wandsworth
54	Purley Way and Beddington Lane Industrial Area	Wandle Valley	Croydon / Sutton
55	Willow Lane, Beddington and Hallowfield Way	Wandle Valley	Merton

6.5.1 London's SILs, listed in Table 6.3 and illustrated in Figure 6.2, are the capital's 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. 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.

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 and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

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) 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 distinguish these from local employment areas that can accommodate a wider range of business uses.

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 the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications.

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 a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, 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**[85] on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential. 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)[86].

6.7.2 Whilst the majority of land in SILs 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.

85 Industrial Intensification Primer, GLA 2017; CAG Consulting, 2017 op cit

86 CAG Consulting, 2017 op cit. Mayor of London. Land for Industry and Transport SPG, GLA, 2012

6.7.3 Outside of areas designated as SIL or LSIS there may be opportunities to deliver a **mix of industrial and residential 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.

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[87]. There may be scope for some **substitution**[88] 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[89].

6.7.6 **Collaborative working** between the Mayor, boroughs and other stakeholders 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 industry to service London's economy and residents is considered alongside other planning objectives including delivery of strategic infrastructure, housing, social infrastructure and other uses.

87 AECOM 2016 op cit

88 The term 'substitution' refers here to making provision of land and floorspace to accommodate business uses in alternative locations outside London to meet projected future demand.

89 CAG Consulting, 2017 op cit. Peter Brett Associates. Industrial Land and Transport Study, TfL, 2017

Figure 6.3 - Simplified illustrations of approaches to SIL/LSIS consolidation

Policy E8 Sector growth opportunities and clusters

A Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.

B London's global leadership in tech across all sectors should be maximised.

C The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:

1) start-up, incubation and accelerator space for micro, small and medium-sized enterprises
2) flexible workspace such as co-working space and serviced offices
3) conventional space for expanding businesses to grow or move on
4) laboratory space and theatre, television and film studio capacity
5) affordable workspace in defined circumstances (see Policy E3 Affordable workspace).

D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be encouraged.

E London's higher and further education institutions and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.

F Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.

G In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:

1) encouraging local innovation to identify and enhance distinct economic strengths

2) co-ordinating infrastructure investment
3) creating a distinct and attractive business offer and public realm
4) ensuring that development complements the growth of town centres and other business locations, and supports the environmental and transport objectives of this Plan
5) bringing forward development capacity
6) improving Londoners' access to employment opportunities.

6.8.1 The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes **supporting business and employment across all sectors** of the economy and capitalising on new growth opportunities in emerging sectors.

6.8.2 This Plan provides the planning framework to complement the **Mayor's Economic Development Strategy** (EDS) to ensure that the varied innovation and workspace requirements of London's businesses are met. This includes the retention and provision of flexible and other forms of workspace to support start-up, existing and growing SMEs. Incubator, accelerator and co-working spaces can provide support and collaboration opportunities for fledgling and growing businesses. Support should meet the requirements of a broad range of SMEs and, in particular, should be tailored to provide opportunities for women and people from BAME backgrounds.

6.8.3 In the EDS, the Mayor has identified a number of sector-specific opportunities and challenges that require a more targeted approach where he believes there are specific business growth opportunities. These include:

- **advanced urban services** – such as architecture, urban design, planning, engineering, property development, energy and transport. The application of data and new technologies to these disciplines has the potential to make London work better as a city, or 'smarter', to become more productive, sustainable and liveable. The Mayor wants London to be a global test-bed for 'smart city' solutions, including improving the way people access public services. To support this, he will help to establish common standards for collecting data and make more data open to the public

- **culture and creative industries** – building on London's particular strengths in film, fashion and design, with clusters emerging across the city (including Creative Enterprise Zones – see Policy HC5 Supporting London's culture and creative industries), and the Mayor's vision to turn the Thames Estuary into a 'Production Corridor', developing facilities for artistic and creative production from East London to Southend
- **financial and business services** – sustaining London's position as a global financial services hub along with a diverse range of professional and business services including legal services, accounting and management consultancy (see Policy E1 Offices)
- **life sciences** - London, Cambridge and Oxford form the "golden triangle" – a world-leading inter-connected region for life sciences research, development, manufacturing and commercialisation. MedCity – a collaboration between London, Cambridge and Oxford Academic Health Science Centres, co-funded by the Mayor - seeks to promote and grow this life sciences cluster. Development Plans should support the range of existing and proposed medical and life sciences research districts associated with MedCity such as those around the Euston Road (including the Francis Crick Institute, Wellcome Trust and University College Hospital); Imperial College London's White City Campus; around Whitechapel, associated with Queen Mary University of London; and the London Cancer Hub. Within this sector there is particular demand for affordable 'grow-on' space (including laboratory space) to ensure London retains the innovations emerging from London-based universities. The networks and facilities that support London's role as a centre of medical excellence should also be supported
- **low carbon and environmental goods and services sector** – building on London's existing strengths in areas such as carbon finance, geothermal, wind energy, building technologies, alternative fuels, photovoltaics and waste management. The Mayor will support businesses to adopt the principles of the circular economy - reducing waste, and improving resource recovery and reuse. The Mayor will also support the growth of London's CleanTech sector across London. West London in particular offers a unique set of opportunities to support the growth of this sector, with the development of a major innovation campus by Imperial College at White City, and the simultaneous redevelopment of Old Oak and Park Royal into a smart and sustainable district

- **tech and digital sector** – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London's global competitiveness (see Policy SI6 Digital connectivity infrastructure). In the City Fringe, the Tech City cluster should be supported as one of London's nationally-significant office locations and complemented by Development Plan policies to enable entrepreneurs to locate and expand there and to provide the flexibility and range of space that this sector needs, including affordable space. The Mayor will support the growth of the tech and digital sector across all of London
- **tourism** - which gives London an international profile - attracting people from across the world - and showcases London as a diverse and open city (see also Policy E10 Visitor infrastructure).

6.8.4 The Mayor also supports measures to secure and develop **London's leading role as a centre of higher and further education** of national and international importance. London's higher and further education institutions have considerable potential for innovation supported by collaboration between businesses, the public sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education institutions and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.

6.8.5 The **Strategic Outer London Development Centre** (SOLDC) concept seeks to support the growth of business and employment opportunities beyond central London. This involves realising the potential of such locations to develop their specialist economic growth in ways which will help achieve the Mayor's wider objectives. Town centres offer particular advantages for some specialist activities but the SOLDC concept can apply to a range of business locations including industrial areas. The approach is designed to encourage local innovation whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs.

6.8.6 **Implementation** of the SOLDC concept will involve actions from a range of partners in light of local circumstances on matters including (but not exclusive to):

- development Plans and frameworks (including Opportunity Area

Planning Frameworks, local Area Action Plans and Town Centre strategies)

- strategic infrastructure plans
- new development and refurbishment
- public transport connectivity and capacity upgrades
- other infrastructure
- management and investment (including Business Improvement Districts)
- improvements to the business environment and public realm
- promotion, branding and marketing.

Policy E9 Retail, markets and hot food takeaways

A A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation).

B In Development Plans, boroughs should:

1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply
2) identify areas for consolidation of retail space where this is surplus to requirements
3) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres
4) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel
5) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping

6) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD8 Town centres: development principles and Development Plan Documents

7) support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone

8) manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport

9) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:

   a) town centre vitality, viability and diversity

   b) sustainability and accessibility

   c) place-making or local identity

   d) community safety or security

   e) mental and physical health and wellbeing.

C Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

D Where development proposals involving A5 hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve,

and operate in compliance with, the Healthier Catering Commitment standard.

E Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need).

F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD8 Town centres: development principles and Development Plan Documents) and residential development.

6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. **Retailing is undergoing a period of continued restructuring** in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. As a result, retailing has evolved to become multi-channel, with a mix of physical stores, often supported by internet 'click and collect' in store or deliveries to homes, workplaces or pick-up points, and in other cases purely online businesses with no physical stores.

6.9.2 Taking into account projected growth in household, commuter and tourist spending in London, retailers making more efficient use of existing space and special forms of trading (which includes internet-related spend), it is estimated that London could have a baseline **need for additional comparison goods retailing** of around 1.6 million sqm over the period 2016-2041, or 1.2 million sqm when current schemes in the planning pipeline are taken into account[90].

6.9.3 In preparing or reviewing Development Plans, boroughs should take into account integrated strategic and local assessments of demand and capacity for both comparison and convenience goods retailing. Boroughs should plan proactively to accommodate that demand and **manage the transition of surplus retail** (including high street frontages, purpose-built shopping centres, malls and retail parks) to other uses in line with this and Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8

90 Experian, 2017 op cit.

Town centres: development principles and Development Plan Documents and Policy E9 Retail, markets and hot food takeaways.

6.9.4 **Street markets** in London can play a valuable economic, social and cultural role[91] helping to meet Londoners' varied dietary requirements, extend choice and access to a range of goods, contribute to the vitality and viability of town centres, and provide opportunities for new businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Columbia Road and Camden for example, and offer significant attractions for Londoners and visitors to the capital. Whilst the planning system can help support the range of London's markets, broader actions are often required in terms of management and investment. The Mayor has established the London Markets Board to help ensure that markets continue to flourish, support growth in town centres and associated high streets, and remain vibrant attractions for all Londoners and visitors to the capital.

6.9.5 Policy SD6 Town centres promotes a **diverse range of uses** to support the vitality and viability of town centres. Some retail and related uses when clustered can support town centres to develop niche or specialist roles and may provide important visitor attractions. Over-concentrations of some uses however, such as betting shops, pawnbrokers, pay-day loan stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans, particularly in town centres that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises[92].

6.9.6 Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas[93]. The creation of a **healthy food environment**, including access to fresh food, is therefore important. The number of

91 GLA Street Markets research – Understanding London's Markets

92 London Town Centre Health Check, GLA 2017

93 From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf

hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas[94].

6.9.7 **Hot food takeaways** generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.

6.9.8 The **Healthier Catering Commitment**[95] is a scheme that helps food businesses in London to provide healthier food to their customers. The scheme promotes a reduction in the consumption of fat, salt and sugar, and an increase in access to fruit and vegetables. This can also help ensure there are healthier food options available for night workers.

6.9.9 Commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises. In parts of London, **small shops and other A Class uses suitable for occupation by SMEs** may be in short supply and affordability can be a key concern. Larger developments that include a significant amount of commercial floorspace should support the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that include smaller premises. Where there is local evidence of need, such developments should also include affordable units (secured through planning conditions or planning obligations as appropriate).

94 Public Health England (2016) Fast Food Map https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf

95 http://www.cieh.org/healthier-catering-commitment.html

Policy E10 Visitor infrastructure

A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

B The special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.

C A sufficient supply of serviced accommodation for business visitors should be maintained, and the provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.

D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in the commercial core parts of the CAZ (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.

E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London.

F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock).

G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:

1) 10 per cent of new bedrooms to be wheelchair-accessible; OR

2) 15 per cent of new bedrooms to be accessible rooms in accordance with the following requirements:

a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use

b) a further one room or one per cent, whichever is the greater, with a fixed tracked-hoist system or similar system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion

c) one room or five per cent, whichever is the greater with an en-suite shower room to meet the requirements of ambulant disabled people

d) four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layouts and be structurally capable of having grab-rails installed quickly and easily if required.

6.10.1 London is the second most visited city in the world and the Mayor wants to spread economic and regeneration benefits by working with London & Partners to **promote tourism across the whole of the city**, including outside central London. This Plan supports the enhancement and extension of London's attractions particularly to town centres and well-connected parts of outer London, complemented by supporting infrastructure including visitor accommodation, high-quality public realm, public toilets and measures to promote access by walking, cycling and public transport.

6.10.2 Given the importance of tourism to London's economy, London needs to ensure that it is able to **meet the accommodation demands of tourists** who want to visit the capital. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum[96].

6.10.3 **Boroughs in the CAZ** are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas with smaller-scale provision in other commercial core areas of the CAZ. Concentrations of serviced accommodation within parts of the CAZ that might constrain other

96 GLA Economics. Working Paper 88. Projections of demand and supply for visitor accommodation in London to 2050. GLA, 2017

important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.

6.10.4 **Alternative forms of accommodation** such as short-term lets have supplemented the supply of serviced accommodation and provided greater choice for visitors. However, it is important that short-term let provision does not compromise the supply of conventional housing and that the impact such provision can have on traditionally residential areas is addressed. The use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand. It is important that this is in appropriate locations and does not disrupt the daily lives of resident students and their academic calendar.

6.10.5 Improving the availability of **accessible serviced accommodation**[97] is vital to ensuring that as many visitors as possible can stay in London and experience its visitor attractions and business offer. To help achieve this, serviced accommodation developments should achieve the highest standards of accessible and inclusive design (also see Policy D3 Inclusive design). The policy requirement provides two options and developers can choose the option which best fits the scale of development proposed. These requirements aim to recognise the need for not only standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer.

Policy E11 Skills and opportunities for all

A The Mayor will work with strategic partners to address low pay and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.

97 Projections of demand and supply for accessible hotel rooms in London, GLA Economics 2017.

B Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) increase the proportion of under-represented groups within the construction industry workforce. In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

6.11.1 London has a strong, dynamic, global economy, but despite the capital's economic growth and prosperity, the employment rate has lagged behind the national average for three decades. More than 270,000 Londoners are unemployed, with particularly high rates of youth unemployment. Employment rates in London are consistently lower for those without any formal qualifications. London also has a growing problem of in-work poverty, associated with low-skilled low-paid work. Ensuring an **effective and responsive skills system** is critical to tackling these issues, enabling more Londoners to find and progress in work and support strategic and local regeneration.

6.11.2 Developers are often required to make **employment and training opportunities in new developments** available to local residents as part of Section 106 planning agreements. While there are examples of this approach working well, by ensuring that developers make a direct, positive contribution to the local communities in which they are working, the current model does not always succeed in enabling residents to complete their training, securing sustainable employment for local people or meeting the demand for construction skills.

6.11.3 **Employment and training targets** included in Section 106 agreements are often based on the number of new apprenticeship or training starts, rather than the meaningful completion of these. The often short-term nature of construction projects compared to the longer duration of apprenticeships mean that apprentices employed at the beginning of a project may not have finished their training by the time construction on site is completed.

This means that once developments finish, apprentices may not be able to move with contractors to developments in different areas (because they too will have their own local labour requirements and requirements for new training and employment starts). They may therefore be unable to complete their training. In addition, local labour requirements can mean that contractors struggle to meet the demand for skills because they must source labour from a geographically-defined labour pool, where the required skills may not necessarily be available.

6.11.4 **Cross-borough working, co-ordination and sharing of data** on employment and training opportunities, together with a more uniform approach to the drafting of Section 106 obligations across the capital could help deliver more successful employment outcomes and ensure that the objectives in part B can be achieved. The GLA is keen to support this approach and, as recommended by the Mayor's Homes for Londoners Construction Skills Sub-Group, will investigate how best to do this, recognising that there is a need to demonstrate that any new approach improves outcomes for employers, boroughs and residents. This new approach should provide more meaningful employment and training opportunities for residents across London, while recognising the importance of new developments for providing local employment opportunities. Successful implementation of this approach should ensure that employment and apprenticeship opportunities created by developments are taken up and completed by a greater number of Londoners.