

## Supplementary Planning Guidance (SPG) Land for Industry and Transport - Response to consultation

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
0	Summary	Design for London	Highlight more positively the importance of industrial land in Summary - eg jobs in industrial land account for 11% of the jobs in London and around 18-20% of the jobs outside the CAZ. Employment for local people. Provides the space for green economy to emerge. Provides essential services to other parts of London's economy.	Noted. Data sourced from URS/DTZ 2010 study	<b>Address wider importance of industrial land in Summary and jobs in industrial land data in para 2.7</b>
0	xii	Berkeley Group	Support commitment to develop more detailed frameworks to manage the release of land. Urge mayor to set out a timetable.	Comments noted. Progress on Opportunity and Intensification Area frameworks is updated annually in the London Plan AMR	No change
0	xii	London First	Support commitment to develop more detailed frameworks to manage the release of land. Urge mayor to set out a timetable.	Comments noted. Progress on Opportunity and Intensification Area frameworks is updated annually in the London Plan AMR	No change
0	xiii	Berkeley Group	Agree that housing should be a key priority for released land.	Noted	No change
0	xiii	MOPC/MPS	Police facilities and other community safety infrastructure are appropriate uses in SIL and SPG should make clear that there is no requirement to determine whether such land is surplus when considering specific policing uses. Change proposed to para xiii - text supplied.	Agree to insert a reference to police and community safety infrastructure in the SPG - para 4.3 (to reflect London Plan para 2.84)	<b>Reference to police and other community safety infrastructure inserted in para 4.3</b>
0	xiv	Freight on Rail	States 'where practicable' which dilutes policy and should be removed.	Where practicable' is considered to be an appropriate qualification as potential to use other modes will depend upon feasibility and site characteristics and location.	No change
0	xv	Freight on Rail	Support safeguarding of sites for water freight - note that rail freight sites need to be protected in the same way for the same reasons.	Noted	<b>Text amended in Summary xxii and in SPG13 ii and iii on safeguarding rail freight.</b>
1	1.3	London First	Supports objectives of SPG	Noted	No change

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1	1.3	London Sustainable Development Commission	Two commissioners have examined the SPG and are of the view that it fulfils its function well and should assist in addressing all of the relevant policies in the London Plan.	Noted	No change
1	1.3	LTGDC	Supports industry objectives of SPG	Noted	No change
1	1.8	LTGDC	Supports land for transport objectives of SPG	Noted	No change
1		British Airways	Supports general introduction. From an aviation perspective it is important that land is available for new airport passenger facilities, ancillary industrial facilities for airports and airlines as well as associated logistics, and transport improvements that increase the connectivity of London airports.	Support including reference to the need for ancillary industrial facilities for airports and airlines as well as associated logistics, and transport improvements that increase the connectivity of London airports.	<b>Insert additional wording in para xxviii in Summary and in para 5.17 and Section 15.</b>
2	2.6-2.9	Freight on Rail	SFRI policy guidance issued by DfT strongly establishes the need for SFRIs and should be included in this section. Also NPPF para 31 re rail freight interchanges - see Freight on Rail response for details.	NPPF para 31 and DfT policy guidance to be addressed in rail freight section.	<b>See amendments to para 13.10</b>
2	2.6-2.9	London First	SPG should be revised to take account of NPPF - see LF response - in particular the clause: 'no reasonable prospect of a site being used.'	SPG updated	<b>SPG updated as a whole to reflect the provisions in the Government's National Planning Policy Framework. See for example paras 2.10 to 2.15, 3.4, 3.25, 3.30, 4.8, 4.10, 6.3, 12.4, 13.10, 13.18 and Annex 1.</b>
2	2.6-2.9	Michael Bach	Need to provide strong economic justification to retain land and buildings in emp use (NPPF para 51). To retain employment in the right place you can quote the NPPF: paras 23, 26, 29/30: locating offices in town centres or failing that in edge of centre locations defined in the glossary as within 500m of a public transport interchange; Para 37: reducing the need to travel/minimise journey length; Paras 93 and 95 reduce greenhouse gas emissions; and para 21 promote and expand clusters.	Support need to address the strong economic reasons in SPG.	<b>See new para 2.11 and also paras 4.8 and 4.10.</b>

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2	2.6-2.9	Workspace Group	Highlight paragraphs 22 and 51 of NPPF	SPG updated	<b>SPG updated as a whole to reflect the provisions in the Government's National Planning Policy Framework. See for example paras 2.10 to 2.15, 3.4, 3.25, 3.30, 4.8, 4.10, 6.3, 12.4, 13.10, 13.18 and Annex 1.</b>
2	Figure 2.1	Design for London	Useful map. It could be bigger, perhaps split into 5 sub-regions. Also suggest PDF version for boroughs to download and use.	Low res PDF maps available from the GLA London Plan Team	No change
3	3.10	Hillingdon	Support a sub-regional approach to benchmarks as a framework for borough local ELRs.	Noted. See also comments on Annex 1.	No change
3	3.15	SEGRO	Typo in first sentence of para 3.15 which is incomplete.	Agree	<b>Typo amended</b>
3	3.2	Design for London	Can fact that SILs and LSIS given same degree of protection in 4.8 be emphasised, for example in 3.2	Repetition not necessary as covered in para 4.9.	No change
3	3.20	British Airways	BA notes change in designation for Hounslow from restricted to limited transfer. Hounslow currently provides industrial land for both ancillary airport and associated logistics use. It is important that such capacity is not diminished. We believe this will be consistent with the new 'limited' designation but want to register our position regarding the importance of such land.	Noted. Annex 1 benchmarks adjusted as part of integrated strategic/local assessment. Hounslow remains in Limited category. Borough benchmark amended from draft SPG.	<b>See Annex 1</b>
3	3.20	Design for London	Para 3.20ii, in some areas of boroughs with restricted release, the smallest non-designated industrial sites become increasingly important and should be treated as strategic and designated.	Useful comment in respect of smaller sites. Boroughs to consider designations as LSIS in light of Section 4. Very small sites would not be appropriately designated as SIL as would not meet the criteria for these locations.	<b>Amend paragraph (3.21) to reflect importance of setting appropriate criteria based policies to manage smaller sites in 'Restricted' boroughs.</b>
3	3.20	Greenwich	Greenwich should be in the 'Managed' category for release (not limited)	Greenwich recommended for move to Managed category	<b>Figure 3.1 and 3.2 amended</b>
3	3.20	Havering	Managed category for release should be reviewed in light of local evidence from URS	Havering recommended for move to Limited category	<b>Figure 3.1 and 3.2 amended</b>

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3	3.20	Hounslow	Hounslow should be in the 'restricted' category for release. Agents opinion supports restricted. Industrial floorspace should not be a measure of demand/supply balance. Vacancy rate of 8.7% does not merit 'managed' category. Rents at £90/sqm are third highest. Demand underestimated relative to local evidence. Suggests retain in 'restricted'.	In light of strategic/local assessment Hounslow recommended, on balance, to remain in Limited category (as per draft SPG)	No change
3	3.20	Waltham Forest	Support limited category for release designation	Noted	No change
3	3.20	Wandsworth	Support restricted category for release designation	Noted	No change
3	3.22	SEGRO	Amend text to encompass London as a whole and SILs/LSIS to avoid confusion and misinterpretation.	Text does relate to London as a whole. Draft SPG para 3.24 deals with SIL/LSIS and other sites.	No change
3	3.24	Havering	Welcome clarification that release benchmarks apply to all sites	Noted	No change
3	3.25	London First	Approach C fits better with national guidance	Consider that Approach B is more proactive and provides a managed approach to designated and non-designated sites in line with national guidance. The text allows for flexibility to adopt Approach C depending upon local circumstances.	No change
3	3.27	Design for London	At end of para add: "Monitoring should include pre-application discussions and prospective industrial land release through emerging policy and supplementary documents".	Useful clarification	<b>Para 3.31 amended</b>
3	3.27	Workspace Group	Monitoring process should be undertaken on a regular basis and in accordance with NPPF.	X-ref to NPPF can be added in para 3.27	<b>X-ref to NPPF (para 22) added to para 3.30</b>
3	3.37	Waltham Forest	Lack of acknowledgment that where SIL is to be released other uses such as residential should not compromise the continued functioning of the remaining industrial land.	Noted	<b>Line inserted into para 3.40 regarding operational integrity of the remaining industrial land following SIL consolidation.</b>

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3	3.38	MOPC/MPS	Police facilities and other community safety infrastructure are appropriate uses in SIL and SPG should make clear that there is no requirement to determine whether such land is surplus when considering specific policing uses. Change proposed to para 3.38 - text supplied	Agree to insert a reference in the SPG - para 4.3 considered to be a better place than para 3.38.	<b>Reference to police and other community safety infrastructure inserted in para 4.3</b>
3	3.7	Croydon	The target for 5% for vacant land is a fairly tight one. Flexibility for variation 0-8% welcomed but SPG should make clear that if rates go above this it should not automatically trigger release of SIL/LSIS.	Important point.	<b>Para 3.7 amended</b>
3	3.7	Croydon	Average frictional rate of vacancy has two aspects: First geographical, ie applies to whole borough, and second, should be measured over a period of time to take account of wider economic cycles	Useful clarification	<b>Para 3.7 amended</b>
3	3.9	Berkeley Group	We question whether with rigorous analysis, and examining the scope for intensification, it might be possible to release more industrial land	Benchmark is based upon robust, up to date strategic research. Scope for intensification covered in section 9 and in particular 9.2 to 9.6.	<b>See paras 9.2 to 9.6</b>
3	3.9	London First	Given Mayor's priority to deliver housing and social infrastructure we question whether it is possible to release more industrial land	Benchmark is based upon robust, up to date strategic research and will contribute towards housing capacity and social infrastructure.	No change
3	Figure 3.1	Waltham Forest	A little confusing that there is no estimate of demands for land for transport, utilities and wholesale markets. Is it left to boroughs because these land demands are likely to be minimal and not strategic?	Research did not quantify these demand but nevertheless important to take them into account. Boroughs best placed to do this in liaison with TfL, Network Rail, utility providers as indicated in para 3.5 and relevant sections of SPG (especially 7, 8 and Part B).	No change
3	SPG3	SEGRO	Support in principle most points but do not support SPG3iii and SPGiv. Benchmarks too prescriptive. Brent and Enfield release benchmark of 0.0 in Annex 1 does not represent flexibility endorsed in Govt planning policy guidance.	Reflect flexibility endorsed in NPPF in para 3.25 and benchmarks for Brent and Enfield to be recast in an integrated strategic and local assessment in final SPG.	<b>See amendments to Annex 1</b>

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3	SPG3	SEGRO	SPG3xii and xiii state 'except in parts of East and North London' too broad brush which might be misinterpreted and contribute towards missed opportunities for consolidation elsewhere in London.	SPG3xii to be amended to be consistent with para 3.15 indicating particular scope in parts of East and North London. SPGxiii concerns development management and no change is proposed.	<b>SPG3xii amended to reflect text in para 3.15.</b>
3	Table 3.1	Design for London	Table should state the baseline.	Add 2010 baseline to table.	<b>Insert column in Table 3.1 to show 2010 industrial land baseline.</b>
3	Table 3.2	Lambeth	Lambeth should be in the 'restricted' category in the table	Agree -error in table	<b>Table 3.2 amended</b>
3	Table 3.2	Southwark	Southwark should not be in the 'restricted' category in the table (it should be in limited category) - looks like an error	Agree -error in table	<b>Table 3.2 amended</b>
4	4.11	Croydon	Need to protect 'poorer' quality locations is supported but note tension with para 4.14v where reference is made to potential for 24 hour working. The latter not always appropriate in Croydon due to close proximity of residential. This shouldn't be a trigger for their release.	Noted. Suggest addition to text to qualify the use of the criteria.	<b>Para 4.12 amended</b>
4	4.11	Croydon	Use of the word 'poorer' to describe sites worthy of retention is not helpful. See Croydon response for useful explanation and detail + examples.	Agree	<b>Reference to 'poorer quality' deleted</b>
4	4.11	London First	Words 'for which there is demand' should be amended to 'where demand is demonstrated'	Useful clarification	<b>Amend wording in para 4.12 to read: '... evidence of demand'</b>
4	4.12	Design for London	Other release criteria may be based on the suitability and sustainability of alternative housing based uses, both in the long term, and in the initial immediate phasing of release and development, and social and transport infrastructure provision.	Criteria in Paras 4.14-4.15 and in section 3 address this matter	No change
4	4.12	Design for London	De-designating and re-designating SIL to LSIS may not be acceptable if there is a substantial decrease in the quality of industrial land.	De-designation and re-designations depend upon location specific circumstances taking into account LP policy 2.17, 4.4 and SPG section 4.	No change
4	4.13	Design for London	Could include criteria around the vibrancy and social value of industrial sites (text supplied)	Covered in para 4.14 iii, suggest add clusters of 'employment' alongside industrial activity	<b>Insert "employment" into para 4.13 iii</b>

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4	4.13	Lambeth	Support criteria, particularly (x) in relation to lower cost industrial premises	Noted	No change
4	4.13	Lee Valley Estates and Workspace Group	In the econ criteria, no consideration has been attributed to the potential for mixed use development of industrial land to enhance/intensify job creation.	SPG para 4.14 iv takes viability into account and section 9 deals with mixed use development. Agree insert in para 9.6 to reflect potential for job creation.	<b>See new paragraph 9.5 and amended 9.6</b>
4	4.13	London First	Add criterion to 4.13 - an assessment of the existing condition of the buildings and the reasonable economic life left within in	Not a specific criteria for release since ageing buildings can be redeveloped / refurbished for new modern fit for purpose stock. Quality of buildings can be included however in broader qualitative assessments (see Annex 3)	No change
4	4.15	Berkeley Group	2 years should be the maximum marketing period to assess demand. Allowing 5 years vacancy is unrealistic creates blight and prevents the best use of land.	Marketing periods and vacancy appropriate for SIL. Flexibility applied to LSIS and non-designated sites - see new para 4.17	No change
4	4.15	Croydon	It should be clear that the demand based criteria in 4.15 dose not apply to sites in SIL or LSIS. Release of sites in these locations should only be undertaken as part of comprehensive review of sites.	Demand based criteria still applies to SIL and LSIS but management of these should take place through the development plan.	No change
4	4.15	Kingston	Welcomes criteria but it would be useful if SPG could specify what actions constitute a site being 'adequately marketed' or at least give examples.	Considered to be tool detailed matter for the SPG. To be determined locally.	No change
4	4.15	Lambeth	Support, especially part (ii) in relation to vacancy periods	Noted	No change
4	4.15	London First	A marketing period of 2 years should be the maximum. Allowing sites to remain vacant for 5 years seems excessive and risks creating blight. Marketing is not the only test for demand-based criteria given that life cycle costs and returns are also critical to take-up	Marketing periods and vacancy appropriate for SIL. Flexibility applied to LSIS and non-designated sites - see new para 4.17	No change

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4	4.15	Tower Hamlets	Support criteria for release. However suggested that the period of marketing be applied flexibly and at the discretion of the boroughs in order that local circumstances can be addressed.	Appropriate for LSIS and non-designated sites	<b>See new para 4.17</b>
4	4.15	Waltham Forest	Opportunity to add more detail through matters such as marketing with appropriate lease terms and conditions, prominent advertising etc.	Considered to be too detailed matter for the SPG. To be determined locally.	No change
4	4.6	Design for London	Could be point about variation in character and quality within a single SIL	Addressed in para 3.26a	No change
4	4.8	Berkeley Group	Do not agree that LSIS should be given same level of protection as SIL - local designations could lead to less rigorous and blanket protection.	This provision is subject to authoritative up to date local ELRs to justify protection of LSIS.	No change
4	4.8	Design for London	Can fact that SILs and LSIS given same degree of protection be emphasised, for example in 3.2	Addressed in para 4.9	No change
4	4.8	London First	LSIS shouldn't be given same level of protection as SIL - unnecessarily protecting sites which should be released for housing	This provision is subject to authoritative up to date local ELRs to justify protection of LSIS.	No change
4	4.9	Design for London	Suggested addition (supplied) to reflect strategic importance of other small industrial sites	Useful supplement	<b>Para 4.10 amended</b>
4	Figure 4.1	Newham	Note that Figure 4.1 does not reflect the release of SIL at Thameside West as per the Core Strategy. This should be amended accordingly.	Figure 4.1 (and Figure 2.1) can be amended to reflect the latest position. Figure 6.1 in the draft SPG cannot be amended as it is a direct copy from another source document. Note that SIL boundaries in the SPG are indicative only.	<b>Figure 2.1 and Figure 4.1 amended.</b>
4	Figure 4.1	Wandsworth	Queenstown Road SIL is now part IBP/part PIL - can this be recognised in the SPG.	This matter is addressed in the SPG para 4.6. Changes to character of SIL to be reflected in reviews to the Plan.	No change
4	SPG4	MOPC/MPS	Police facilities and other community safety infrastructure are appropriate uses in SIL and SPG should make clear that there is no requirement to determine whether such land is surplus when considering specific policing uses. Change proposed to SPG4i. - text supplied	Agree to insert a reference to police and community safety infrastructure in the SPG - para 4.3 (to reflect London Plan para 2.84)	<b>Reference to police and other community safety infrastructure inserted in para 4.3</b>

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4	SPG4	SEGRO	Support but suggest amendment to accord with para 22 of the NPPF: add words "regularly review and" prior to the word "define" at SPG4iii	More appropriate to insert in SPG3iii and in para 3.30	<b>Insert "regular" in SPG3ii and insert "...in line with NPPF (paragraph 22) requirement to review land allocations regularly" at the end of para 3.30</b>
4	SPG4	Workspace Group	Need an additional delivery mechanism relating to enabling development in this section through MUD. Workspace has several examples that are successful and compatible with residential and other land uses.	Addressed in Section 9 redevelopment of surplus industrial land and mixed use development.	<b>See new paragraph 9.5 and amended 9.6</b>
5	5.21	Bromley	Request that OLC work on parking will be reflected in final version of SPG enabling authorities to take full account of local circumstances	Support	<b>See new paragraph 5.23 and paragraph 22.1</b>
5	5.15	Freight on Rail	River Road, Barking, Rippleside, Dagenham Dock/Havering Riverside and Belvedere in TG offer strategic sites for rail freight including access from HS1 for high speed freight. There are exchange sidings for transfer of trains from HS1 to traditional guage.	Note that this matter is broadly dealt with in LP policy 6.15 and para 6.50. Note that the main section on rail freight moved to section 13.	<b>New paragraphs added at 13.11 and 13.12</b>
5	5.15	Lee Valley Estates and Workspace Group	Blackhorse Road SIL is not suitable for location for logistics businesses. Whilst close to a strategic road, the level of traffic in the immediate area and time to access key routes eg A406/M25 makes it less suitable for logistics compared to locations in Enfield eg Brimsdown.	Although Blackhorse Road does provide valuable capacity for logistics and distribution, this location is not as important for large scale strategic logistics as locations in Enfield and Haringey	<b>Waltham Forest' removed from the list of boroughs in para 5.13, and Blackhorse Road removed from para 5.15.</b>
5	5.24	Freight on Rail	Comments on economic, social and environmental benefits of rail freight.	Support - note main section on rail freight moved to section 13	<b>Incorporated in paragraph 13.8</b>
5	5.24	Freight on Rail	Support and suggest reference to inter-modal rail freight traffic should be added given increases in this traffic.	Support - note main section on rail freight moved to section 13	<b>Incorporated in paragraph 5.4, 5.25 and see Section 13 paras 13.8 to 13.19 and new Annex 5</b>

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5	5.24	Transport for London	Wording of new paragraph 5.24 should be changed after "large vans and minibuses" to say "are" instead of "will be" since the LEZ changes have now taken affect.	Support	<b>Wording of new paragraph 5.24 amended after "large vans and minibuses" to say "are" instead of "will be" since the LEZ changes have now taken effect.</b>
5	5.26	Freight on Rail	Suggest that reference to 2 Govt policies should be added which relate to the need for freight facilities of all sizes - SFRI policy (DfT Nov 2011) and NPPF - see detailed response	Support - note main section on rail freight moved to section 13	<b>Incorporated in paragraph 13.10</b>
5	5.26	Transport for London	Suggest insert new para to support safeguarding rail freight facilities - text supplied	Support - note main section on rail freight moved to section 13	<b>Para 13.8 amended</b>
5	5.26	Transport for London	After 'London Plan Policy 6.15 supports the provision of SFRI to enable' insert "modal shift from road to rail, and to enable..."	Support - note main section on rail freight moved to section 13	<b>Para 13.11 amended</b>
5	5.27	Transport for London	Toolkits referred to are now out of date. TfL suggests para is deleted and replace - wording supplied.	Support	<b>Para 13.13 amended</b>
5	5.28	Transport for London	Suggests wording for para 5.28 re: assessment of potential local terminal sites or existing sites with development potential - see wording supplied	Support	<b>Para 13.14 amended</b>
5	5.4	Freight on Rail	Reference should be made to transfer across different modes	Support	<b>"Inter-modal transfer" inserted in para 5.4</b>
5	5.6	Freight on Rail	Suggest clarification to explain that transfer between different links in the chain could include transfer between different transport modes	Covered in para 5.4 above	No change
5	SPG5	British Airways	BA supports policy, particularly for West London and Heathrow.	Noted	No change
5	SPG5	Freight on Rail	Welcome strong support for rail freight and identified need for more rail road transfer points. We would highlight the importance of protection of strategic rail sites and routes. GLA/boroughs should check with rail industry rep, DfT and Network Rail before surplus land is released.	Support - see TfL comments above	Text amended - see TfL comments
5	SPG5	Freight on Rail	Support wording. In addition, reference should be made for all listed organisations to safeguard suitable sites for future possible rail use, in the way SPG6 is doing for waterways. This would be in line with NPPF para 41.	Support	<b>SPG5v add to end of sentence: "and safeguard rail freight sites where there is evidence that these could be crucial in developing infrastructure".</b>

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5	SPG5	London Aggregates Working Party	SPG does not offer the safeguarding that is needed for the rail depots in London for aggregates.	Noted	<b>Text and new appendix inserted (Section 15 and Appendix q)</b>
5	SPG5	London First	Support consolidation centres. TfL should accelerate its identification of sites for consolidation centres and SPG5iii should be amended to read: "...large scale distribution activities and urban consolidation centres in the light of ...."	Support	<b>Insert in first line of SPG5iii "...and urban consolidation centres..."</b>
5	SPG5	Transport for London	SPG5v add to end of sentence: "and safeguard existing rail freight sites". Section SPG5vi delete "attract high"	Support - note main section on rail freight moved to section 13. Support amendment to draft SPG5vi (final SPG5v)	<b>See amended SPG13ii and iii regarding safeguarding of existing rail freight sites. Section SPG5v delete "attract high"</b>
5		Waltham Forest	Significant growth in logistics sector in Waltham Forest is not supported.	It is accepted that Haringey and Enfield are the main strategic logistics centres in the Upper Lee although some logistics still appropriate in WF.	<b>Delete 'Waltham Forest' from the list of boroughs in para 5.13, and Blackhorse Road from para 5.15.</b>
6	6.11	Newham	The need for additional boatyard facilities is supported. There is potential for boat repair activities to be promoted within the Royal Docks, particularly within Royal Albert Basin.	Noted	No change
6	6.6	Greenwich	SIL release should be phased and 'front-loaded'. The release or relocation of Tunnel and Riverside Wharves by the Secretary of State would hopefully follow as the redevelopment of these areas progresses.	Wharves review ongoing - consultation responses are being considered - current draft retains safeguarding of both wharves	No change
6	6.7	Newham	Attention is drawn to part of Newham's response to the draft Safeguarded Wharves Implementation Plan - that there is potential for reconfiguration or a land swap to move the wharf functions from Thames Wharf to the adjacent Carlsberg Tetley site which we believe can be delivered within the lifetime of the LP and should be included in the review.	Wharves review ongoing - consultation responses are being considered	No change
6	6.7	Port of London Authority	PLA concurs with the approach taken within the SPG and guidance at SPG6, although would note that the forecasts at para 6.7 will require amendment in the light of further consideration following consultation responses.	Agree	<b>Forecasts updated in para 22.16</b>

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7	7.4	Freight on Rail	As recent rail flows for waste to energy demonstrate, rail has an important role to play in this sector so that a reference to suitable rail connected sites should be included in this paragraph.	Maximising the potential use of rail and water transport is covered in this section (last line para 6.4).	No change
7	SPG7	Environment Agency	Support sustainable management of waste and proactive approach to accommodating facilities	Noted	No change
7	SPG7	Freight on Rail	Support policy but suggest remove qualification 'where practicable' in SPG7v to make a stronger case for sustainable modes.	Where practicable' is considered to be an appropriate qualification as potential to use other modes will depend upon feasibility and site characteristics and location.	No change
7		Lambeth	Supports reference to proactive approaches to accommodating waste management uses	Noted	No change
8	SPG8	British Airways	Supports comment that airport capacity must be sufficient to sustain London's competitive position. Whilst need for additional industrial land take is low, SPG8 should not rule this out as likely to increase as aircraft sizes increase eg A380 and longer B777 as well as increase in long-haul vs short-haul flights within the current 480k air movement cap.	Noted	<b>Relevant content of draft SPG section 8 moved to Section 15 (aviation)</b>
8	SPG8	Freight on Rail	See comments on SPG5 and section 5	See comments on section 5 above	<b>Content of draft SPG Section 8 reorganised. Bus garages moved to Section 16, Aviation to Section 15</b>
9	9.7	Environment Agency	Some of wording in 9.7 is now out of date. Following Public Enquiry in 2010, Thames Water has reviewed their Water Resource Management Plan (WRMP). Their new final draft WRMP has been out for consultation and a reservoir is no longer a preferred option. Suggest re-word section (See EA response for suggested wording)	Support	<b>Text amended with this clarification (see para 7.8)</b>
9	9.8	Environment Agency	Suggest remove last sentence of para 9.8 is removed as this is not accurate in all cases (See EA response for examples why)	Only refers to a tendency and therefore wording considered appropriate	No change

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9	SPG9	Environment Agency	Support SPG9 including need to engage water companies at early stage to ensure potential capacity issues are identified and potential land requirements assessed.	Noted	No change
9	SPG9	London First	Strongly support SPG9 given scale of ambition in LP for delivery of low-carbon district energy.	Noted	No change
11	11.15	Waltham Forest	Priority for housing in mixed use schemes needs to be related to proximity of appropriate social and physical infrastructure. For this reason, WF Core Strategy places social infrastructure ahead of residential in redevelopment of industrial areas.	The Mayor's key priority re-use for surplus industrial land is housing.	<b>Amend para 9.17 to read: "...is the Mayor's key priority..."</b>
11	11.3	Waltham Forest	Need for flexibility in exceptional circs where existing stock no longer fit for purpose and viability issues means that the only reasonable prospect for continued use on the site would be through mixed use development with large proportion of good quality workspace.	Fit for purpose is a criteria in LP policy 4.4. Viability is introduced as new criteria in SPG 4.13/4.14. WF point addressed in new para inserted at 9.5.	<b>See new para 9.5</b>
11	11.16	Environment Agency	Suggest that reference to LP Policy 7.18 is added to support the mention of open space in first sentence of para 11.16. Also suggest the inclusion of 'urban greening' and ref to Policy 5.10 and 5.11 (Green Roofs) would be useful additions to last sentence of this paragraph.	Support	<b>Cross references to LP Policies added in para 9.18</b>
11	11.5	Berkeley Group	Where redevelopment does take place any requirement for re-provision of employment land should relate to actual employment levels rather than floorspace, to enable the best use of land	Actual employment levels should be considered <u>alongside</u> employment capacity potential (not rather than) - reflected in new para 9.5	<b>See new para 9.5</b>
11	11.5	London First	Where industrial sites are redeveloped with re-provision of employment land, the SPG should give additional weight to actual employment levels that can be delivered on site rather than an assumption of delivering employment provision based upon floorspace.	Actual employment levels should be considered <u>alongside</u> employment capacity potential (not rather than) - reflected in new para 9.5	<b>See new para 9.5</b>
11	SPG11	Environment Agency	Support issues in para 11.6 and suggest these are reflected in SPG11 - see EA text supplied.	Acknowledge point however these matters are dealt with adequately in the SPG text.	No change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
11	SPG11	SEGRO	In principle support.	Noted	No change
11	SPG11	Workspace Group	Supports. Policy should reference paras 22 and 51 of NPPF	SPG updated	<b>SPG updated as a whole to reflect the provisions in the Government's National Planning Policy Framework. See for example paras 2.10 to 2.15, 3.4, 3.25, 3.30, 4.8, 4.10, 6.3, 12.4, 13.10, 13.18 and Annex 1.</b>
11		Design for London	Chapter should refer to redevelopment of surplus industrial land	Support	<b>Amendments to section 9 to reflect London Plan policy 4.4</b>
11	11.5	Lee Valley Estates and Workspace Group	No consideration has been attributed to the potential for mixed use development of industrial land to enhance/intensify job creation.	See new para 9.5	<b>See new para 9.5</b>
12	12.6/12.7	Bromley	Request that OLC work on parking will be reflected in final version of SPG enabling authorities to take full account of local circumstances	Support	<b>See amendments to para 10.17(e) and para 20.1</b>
12	12.11b+d	Kingston	Unclear what 'primary distributor roads' and 'main distributor roads' mean. Should be consistent with road hierarchy ie TRLN, A Class Roads etc. If not a clearer explanation required.	Agree terminology should be clear and consistent	<b>References to 'primary' and 'distributor' deleted (para 10.17c)</b>
12	12.11d	Bromley	Request that OLC work on parking will be reflected in final version of SPG enabling authorities to take full account of local circumstances	Support	<b>See amendments to para 10.17(e) and para 20.1</b>
12	12.15	Environment Agency	Advise that para 12.15 includes ref to LP policy 5.15 water use and Policy 7.14 air quality. EA is working with GLA to ensure this is updated in sustainable design and construction SPG. Text supplied for amends to 12.15 (i) and (xi)	Support clarification "and water" efficiency. Air quality is covered adequately in paras 9.18 and 10.15.	<b>"and water" inserted into para 10.2.</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
12	12.18	Workspace Group	Innovative solutions to operations, storage, hot-desking etc, reduced space requirements.	Text supplemented in para 10.24 intensification of industrial space	<b>See amended para 10.24</b>
12	12.8	Environment Agency	Welcome acknowledgement of potential contamination in para 11.6 and need for coordinated investigation and remediation of sites in 12.8. Suggest more detail is provided in the SPG. EA supplied some text to assist.	Support opportunity to provide additional guidance on investigation and remediation.	<b>Two paragraphs added at 10.9 and 10.10</b>
12	12.9	Havering	Welcomes industrial land design guidance due to unique characteristics of such areas	Noted	No change
12	12.9	Newham	Welcomes industrial land design guidance a particularly relevant issue in Newham	Noted	No change
12	12.9-12.17	English Heritage	Industrial design guidance is welcomed but incomplete and doesn't reflect NPPF that the quality of development should be based upon an understanding and evaluation of the areas defining characteristics. This should include local character and history. See EH response for details.	Add x-ref to NPPF and LP policy on design, context and historic environment	<b>See amendments to para 10.15</b>
12	SPG12	Environment Agency	Support SPG12. In relation to SPG12i suggest specific reference made to Sust design and constr SPG. Suggest SPG12iv should consider 'hub and cluster' soil treatment facilities.	Support X-ref to Sustainable Design and Construction SPG. Hub and cluster soil treatment perhaps too detailed for Industry SPG.	<b>Add specific reference in SPG10i to "Sustainable Design and Construction SPG"</b>
12	SPG12	Workspace Group	Support	Noted	No change
12		Berkeley Group	Consolidation would aid the provision of more viable and higher quality locations while releasing surplus land for other uses.	Covered in section 9.	No change
12		SEGRO	SEGRO has an active Development team in London, redeveloping and regenerating out-dated property into modern fit for purpose industrial accommodation.	Useful principles for quality section	<b>See para 10.11</b>
12		Waltham Forest	Little guidance is provided on how investment can be secured to ensure that SIL remains fit for purpose.	Useful points	<b>Amendments to para 12.11 and new paragraph 12.12 inserted on BIDs.</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
13	SPG13	Waltham Forest	Little guidance on how SME are to be protected and supported. If space included in MUD there is no recognition of potential conflicts with regeneration efforts pricing out SMEs. Potential solutions include mechanisms for provision of affordable workspace to be agreed through planning conditions/s106.	Addressed in 11.8. Suggest also flag in SPG11	<b>Text inserted in SPG11</b>
13	SPG13	Westminster	Re: provision for creative industries, the Council requests a range of business floorspace including workshops and studios. To encourage creative industries, the Council where appropriate will secure any new workshop and studio space by legal agreement to ensure its long term retention.	Addressed in 11.8. Suggest also flag in SPG11	<b>Text inserted in SPG11</b>
13	13.6	Design for London	End of para 13.6 could note: "The majority of space suitable for SMEs may be in undesignated other industrial sites, highlighting the importance for boroughs to carry out sufficient research to guide policy and development management.	Useful comment	<b>See text inserted at end of para 11.6</b>
13	13.6	Workspace Group	Potential economic and social benefits of SMEs include: (see bullets in response)	Useful comments to add to para 11.7	<b>Text inserted into para 11.9 re: contribution to London's employment and entrepreneurial base</b>
13	SPG13	Workspace Group	Support SME accommodation - could be part of MUD	Useful comment to pick up in section 11	<b>Text inserted into para 9.5</b>
13		Havering	Welcomes recognition of need to provide low cost accommodation including for SMEs	Noted	No change
15	15.1-15.7	Tandridge District Council	Guidance should take into account the possible cross boundary transport implications on places such as Tandridge adjoining the boroughs of Croydon and Bromley. The Thameslink Programme will be of great benefit to Tandridge (East Grinstead Line).	Include reference to consultation with neighbouring authorities where appropriate.	<b>Amend last sentence in para 13.5 to read: "Consultation with TfL and other authorities (including those outside London where appropriate) is recommended at an early stage..."</b>
15	15.13-15.16	Tandridge District Council	Guidance should enable consideration of potential of: (a) extending the Tramlink network - options for a Purley/Streatham extension, and (b) feasibility for Tramlink extension to and from Selsdon	Comments noted.	No change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
15	15.2	London Aggregates Working Party	Re network Rail having to consult ORR on any land release and consulting the Borough is no security, as they may welcome a regeneration change of use. Nor does it cover rail sidings on private land.	Network Rail must seek ORR consent for any disposal not covered by a general consent. ORR's procedures include consultation with TfL and local authorities regarding the disposal of land in Greater London.	No change
15	15.6	Transport for London	Paragraph to be updated to reflect the current position	Paragraph to be updated to reflect the current position	<b>Paragraph 13.6 updated</b>
15	15.6	British Airways	Refers to HS2 but doesn't refer to separate spur to Heathrow that the Govt plans to build alongside the legs to Manchester and Leeds in Phase 2. As this spur is likely to run through Hillingdon this should be referenced.	Paragraph to be updated to reflect the current position	<b>Paragraph 13.6 updated</b>
15	15.6	Hillingdon	Council has fundamental concerns regarding the local impacts of the proposed HS2 scheme and how the decision was reached. The Council and LB Camden as part of the 51m group have lodged a judicial review regarding the validity of the decision. Notwithstanding the Mayor's position it is important that the SPG reflects the significant opposition to the scheme	Noted	No change.
15	15.8	Hillingdon	Hillingdon has aspiration for extension of the Central Line to Uxbridge by means of a spur to the west of Ruislip Gardens, with the route to West Ruislip also being retained. Council supports the view of TfL (Feb 2009 report) that there may be a good business case for the Central Line extension to Uxbridge and this position should be reflected in chapter 15 of the SPG.	Noted however this should not be included in SPG as proposal not within London Plan or MTS	No change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
15	SPG15	British Airways	SPG15 section refers to LP Table 6.1. The now defunct Airtrack scheme is included in this table and its cancellation should be noted. The proposals for a "western connection" from Heathrow Terminal 5 up to the Great West Main Line should be noted. The WRAtH proposal has potential to through-run Crossrail and national trains from Paddington to Reading via Heathrow.	Can confirm that Airtrack scheme is not being taken forward. No other changes as the statement is not echoed by the London Plan.	<b>Text inserted in paragraph 13.5 to clarify the position regarding the Airtrack scheme</b>
15	SPG15	London First	Support. In reviewing the safeguarding of Crossrail 2, it is vital the lessons are learnt from Crossrail and that it gathers world-class engineering expertise to bring forward a credible safeguarding proposal alongside commitment to progress the scheme that minimises blight.	Noted	No change
15		Southwark	Wish to stress that early engagement between stakeholders is critical so that the land implications and timescales for development are clearly understood by all parties. Specifically, we are very keen to hold such discussions with Transport for London with regard to the proposed southern extension of the Bakerloo line to Camberwell and Peckham, which is identified as a priority project in Table 6.1 of the London Plan	Noted. Early engagement of stakeholders is stressed in para 13.5	No change
15		Waltham Forest	Welcome this section. Consistent with plans to re-open Lea Bridge Station which we look forward to the Mayor's support with.	Noted	No change
16	16.1	Greenwich	Extremely important that any review of safeguardings involves adequate land being retained to support the potential future development of fixed links	Existing wording contains a balanced approach to safeguarding and not unduly hindering development. See also amendments to 12.4	<b>See amendments to para 12.4.</b>
16	16.1	TfL	Paragraph 16.1 needs to be changed to say "A cable car linking North Greenwich and the Royal Docks opened in June 2012"	Noted	<b>Paragraph 14.1 amended accordingly</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
16	16.1	Westminster	Safeguarding of land for river crossings only mentions those east of Tower Hill. It is unclear why other crossings such as potential pedestrian/cycle crossing at Nine Elms is not included. The City Council has already advised GLA/TfL officers of its concerns on this emerging proposal.	Noted	<b>References to 'east' in paragraph 14.1 and the wording "East of Tower Bridge" in SPG14 have been removed.</b>
16	16.2	TfL	Paragraph 16.2 needs to be changed to say "Recently, the Mayor has stated, subject to full analysis, his preference for a ferry crossing between Thamesmead and Beckton"	Noted	<b>Paragraph 14.2 amended accordingly</b>
16	16.2	Newham	LBN cannot support the Armada Way Ferry Link access option (reasons supplied in response). Para 16.2 which highlights Mayor's preference for ferry crossing contradicts SPG16 which states partners should retain safeguarding alignments for proposed river crossings east of Tower Bridge. TfL's river crossings study not yet published and SPG should not prejudge outcome of study.	Noted	<b>Text in paragraph 14.2 amended</b>
16	SPG16	Greenwich Peninsula Regeneration Ltd	GPRL do not consider that SPG16 goes far enough to ensure the river crossing safeguardings are reviewed and kept up to date. The Silvertown Crossing Safeguarding is preventing development and blighting the peninsula masterplan. Since approval of Emirates Air-Line it is accepted by all that a bridge is no longer possible and only a tunnel is feasible. Suggest add to SPG16: "The Mayor will review safeguardings as necessary to ensure they remain appropriate and do not unduly hinder development of land.	Overarching statement inserted in paras 12.3 and 12.4 drawing on NPPF para 41 and LP Policy 6.2 and paras 6.12/6.13.	<b>See paras 12.3 and 12.4</b>
16	SPG16	London First	Support policy, but add wording: "The Mayor and TfL will review safeguardings when required to ensure they remain appropriate and do not unduly hinder development of land."	This applies to all safeguarding not just river crossings. Overarching statement inserted in paras 12.3 and 12.4 drawing on NPPF para 41 and LP Policy 6.2 and paras 6.12/6.13.	<b>See paras 12.3 and 12.4</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
17	17.1	Westminster	Welcomes provision of improved surface access to London's airports but subject to improved onward transport and interchange facilities at Paddington and Victoria.	Noted	No change.
17	17.1, SPG17	Tandridge District Council	Guidance should take into account the impacts of additional runway capacity on neighbouring areas to London - Council is opposed to an additional runway at Gatwick.	This is not a matter for the SPG.	No change
17	SPG17	British Airways	Supports SPG17. BA would note that ancillary and associated logistics facilities in the area of Heathrow also facilitate improvement for passengers (ie terminal support facilities, logistics for aircraft servicing, in-flight meals, cargo etc) and these should also be included in this statement.	Noted and useful clarification/detail	<b>Text in new para 15.2 to be amended with this clarification and insert "including ancillary services/facilities" in SPG15</b>
17		Waltham Forest	Lack of acknowledgement of environmental issues - noise and air pollution - which must be balanced along with economic gains.	Insert text to better reflect content of LP Policy 6.6 Ba	<b>Para 15.2 amended</b>
18	18.12	Greenwich	Would also support the safeguarding of the proposed bus priority route / Riverside Transit system along the Greenwich Waterfront.	Existing wording reflects current scheme priorities. Greenwich Millennium Village referenced in 16.19	No change
		Westminster	The Council would be concerned about any intensification of the use of the Westbourne Park bus garage over and above the current Crossrail proposals currently under discussion as bus garage is poorly located in terms of road safety and pedestrian crossing facilities.	Note that there is no specific mention of Westbourne park bus garage in the SPG.	<b>Insert 'where appropriate' at the end of paragraph 16.6.</b>
18	18.;8-18.11, SPG18	Tandridge District Council	Cross boundary transport implications in respect of bus routes - scope for joint working to provide Real Time Passenger Information on cross boundary bus routes.	Insert text in relation to duty to cooperate.	<b>Insert in para 16.15: 'Where new development places significant additional demands on the bus network beyond London, consultation should be undertaken with the relevant neighbouring authorities.'</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
18	SPG18	London First	Support LP Policy 6.8 re: Mayor's commitment to investigate feasibility of developing a series of coach hubs. Therefore SPG18ix should be amended to reflect this policy and should read: "Consider the continued use and upgrade of Victoria Coach station...."	Noted	No change
18	SPG18	Southwark	We note that additional guidance in SPG18 sets out that making provision for coach parking is important in supporting London's visitor economy. We support this in principle, but based on experiences in the borough we would recommend that additional text be added to highlight that the location of on-street coach parking requires careful consideration to ensure that the additional noise and traffic created does not adversely affect the amenity of existing residents and/or neighbouring uses	Support	<b>See amendment at SPG16(x)</b>
18	SPG18ix	Westminster	This SPG point is contrary to the Council's long standing position that if Victoria Coach Station is redeveloped, its termini capacity would be spread across London and through the development of separate hubs and not just centred in Westminster.	Noted	No Change
18	SPG18viii	Kingston	Re: facilities for coaches and minibuses, Kingston request that "in agreement with TfL" is removed from last sentence in SPG18viii.	Any changes to coach or minibus services must be in consultation and agreement with TfL due to impacts on the TLRN.	No change.
18		Waltham Forest	Noted that since dedicated ring fenced funding was discontinued approximately 2 years ago, bus priority schemes are now supported at a much lower level than they were previously.	Noted	<b>Paragraph 18.17 amended to read: "consider LIP funded corridor schemes within the borough, carrying out monitoring to determine the impacts on buses and other users"</b>
19	SPG19	Kingston	Re: provision for taxi and private hire, Kingston request that "in accordance with details to be agreed with TfL" is removed from last sentence in SPG19. Also para 19.3 refers to Dial a Ride, hospital and local authority transport but these are not referred to in SPG19.	Any changes to taxis or private hire services must be in consultation and agreement with TfL due to impacts on the TLRN.	No change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
20	20.6-20.9, SPG20	Tandridge District Council	Guidance should enable adequate provision for secure cycle parking and hire facilities at London termini including Victoria and London Bridge.	Noted	<b>Paragraph 18.8 amended to read: "...high demand locations such as town centres, stations and termini and the provision of high quality cycle facilities". Paragraph 18.9 amended to read: "...and Cycle Hire Scheme"</b>
20	SPG20	London First	Strongly support policy approach proposed (para xxxiv) re Legible London Wayfinding. This should be in SPG20iii after "wayfinding" add "supported by adequate space for the introduction of Legible London wayfinding"...	Support	<b>Inserted into para 18.3: "supported by adequate space for the introduction of Legible London wayfinding"</b>
20		LTGDC	Guidance should strongly encourage Boroughs' DPDs to support the provision of new safe walking and cycling routes, especially where existing transport infrastructure creates a barrier to movement between communities.	Support in principle	<b>Text inserted in SPG18iii "...and the potential to overcome barriers to movement"</b>
20		Waltham Forest	Incorporation of 20mph speed limits in residential areas could be cited as part of package of interventions to encourage walking and cycling.	Support	<b>New text added paras 18.10-18.12</b>
21		Waltham Forest	Concept of smoothing traffic flow is questioned - and encourages additional car trips and undermines measures to encourage walking and cycling elsewhere in the SPG. Current wording of 21.3 makes it unclear what takes priority - pedestrians, cyclists or road users.	Text in section 19 amended	<b>See paragraphs 19.2 and 19.3</b>
22	22.6-7, SPG22	Tandridge District Council	Take account of cross boundary impacts of any park and ride schemes	Insert new paragraph to highlight cross-boundary impacts	<b>New paragraph 20.8: Cross boundary impacts of any park and ride schemes should be taken into account and consulted upon with the relevant neighbouring authorities, including those outside of London.</b>
22	All	Bromley	Request that OLC work on parking will be reflected in final version of SPG enabling authorities to take full account of local circumstances	Support	<b>See amendments to para 10.17(e) and para 20.1</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
22		Hillingdon	It is unclear how the provisions of Policy 6.13 and Table 6.2 in LP relate to B2 and B8 uses. It is important that the SPG reflects that employees in outer London locations are often more reliant on private cars to access employment locations. Parking standards should be higher in OL to reflect more limited PT access.	Support	<b>See amendments to para 10.17(e) and para 20.1</b>
23		Westminster	The SPG does not contain mention of safeguarding land for refueling stations (including hydrogen refueling). City Council's emerging policy on this matter is set out in City Mgmt Plan consultation draft Nov 2011 Policy CMP 5.16.	Comments noted. TfL will monitor this for future MTS updates as appropriate	No change
24	24.6	Havering	Notes the shortage of boat repair facilities on the Thames and would be keen to explore the opportunities for providing such facilities within Havering.	Noted	No change
24	24.8	Environment Agency	Support promotion of recreational facilities in 24.8 in line with Policy 7.27. The EA's Enjoying Water document and mapping provides useful evidence base to support promotion of future priorities for access and water recreation in London.	Noted	No change
24	SPG24	Environment Agency	Support in principle the use of the river for passenger, tourist services and to transport freight - however increased use could conflict with other environmental, recreational and navigational uses of the river. EA suggest some added words to this section and to SPG24 to ensure conflicts are avoided or mitigated in line with LP para 7.73	Noted	<b>New paragraph inserted at 22.9: "Any new services or facilities should avoid or mitigate conflicts in line with London Plan Policy 7.26"</b>
24	SPG24	Port of London Authority	PLA concurs with Section 24, although this primarily relates to passenger transport, and furthermore the guidance in SPG24	Noted	No change
Annex 1		Greenwich	The land release benchmark of '0' is inappropriate, given that: East London benchmark is 80ha per 5 year period; reduction in industrial demand component; risk of increasing vacancy rate in Greenwich; at odds with 'limited' release category.	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
Annex 1		Havering	Havering had commissioned URS to undertake a comprehensive ELR - due to be published in May. Concerned that the 74.2ha SPG benchmark does not reflect up to date locally derived evidence.	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>
Annex 1		Hillingdon	Concern that the proposed release benchmark of 66ha is far too high and will exacerbate pressure on industrial and warehousing land. RTP analysis does not take account of local factors such as impact of VOA revaluation of uses around Heathrow and large numbers of MOD sites released from industrial related uses. High rents around Heathrow and West London evidence of strong demand. NB Also impact of Crossrail.	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>
Annex 1		Lee Valley Estates and Workspace Group	We note figures in Annex 1 are indicative, but the figures should be as accurate as possible within reason. Currently the SPG states 10.4ha for Waltham Forest, significantly below the figure in Waltham Forests ELR 2009 of 21.3ha. Allowing for release to date, the benchmark should be 17.5ha to 2026, and greater to 2031.	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>
Annex 1		SEGRO	Suggest Annex removed altogether. If it is to remain, then it needs to be more explicit in stating that the benchmarks are indicative, that 0.0 doesn't mean a total block on industrial land release and that transfer and consolidation of land within SILs, LSIS and elsewhere in London (not just East and North) is a possibility via the DPD of Development Management processes, subject to appropriate quantitative and qualitative assessment of demand including site specific analysis	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>
Annex 1		Southwark	Release benchmark of 37ha 2011-2031 too high - when combined with historic release 2006-2010 would mean 61ha release 2006-2031. Emerging evidence and Core Strat suggest 1.1ha pa release.	Borough benchmarks to be updated in light of the strategic evidence and local evidence in ELRs, DPDs and planning frameworks.	<b>See Annex 1 revised</b>
Annex 1 supplement		English Heritage	No further comments	Noted	No further change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
Annex 1 supplement		Highways Agency	No comments	Noted	No further change
Annex 1 supplement		SEGRO	SEGRO welcome that the SPG now more accurately reflects LB Enfield's ELR 2012 which was published shortly after the draft SPG. SEGRO considers that the proposed benchmark more accurately reflects the provisions made by the NPPF.	Noted	No further change
Annex 1 supplement		Southwark	No objection. The proposed revised integrated industrial land release benchmark for Southwark has been reduced to 25ha over the period 2011-2031; a reduction of around 12ha from the previous draft SPG figure (37.7 ha). This equates to an annual release benchmark of 1.3 ha. This is an improvement on the previous high annual release benchmark of 1.9ha set out in the draft SPG and it also correlates with Southwark's current annual release rate of 1.3 ha over the period 2011-2026 which is based on the planned release of 20ha over the Core Strategy plan period. In the light of this, Southwark does not wish to object to the revised release rate.	Noted	No further change
Annex 1 supplement		Waltham Forest	Support. Based on the findings of Council's employment land study, the adopted Core Strategy allows for the release of 24.5 hectares of industrial land in the borough to 2026. As the figures provided in the Land for Industry and Transport SPG cover a longer timeframe than the adopted Core Strategy, the proposed release of 28 hectares is considered reasonable and supported by the Council.	Noted	No further change
Annex 1 supplement		Havering	Havering welcome the inclusion of integrated benchmarks within the SPG and in particular supportive of the consideration of Local Employment Land Reviews. In this context, the borough welcomed a revision of Havering's release benchmark from the draft SPG and the change of categorisation from Managed transfer to Limited transfer	Noted	No further change

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
Annex 1 supplement		Ealing	Provided details on changes in Ealing's designated industrial land supply arising from the Development Sites DPD 2012	Noted	<b>See Annex 1 revised</b>
Annex 1 supplement		Hammersmith & Fulham	Support proposed change to 'restricted transfer with planned exceptions'. It is likely that there will be loss of industrial land around the Old Oak Common area as part of proposed major rail interchange.	Note support for change in categorisation. Regarding Old Oak, the GLA will continue to engage with the borough through work on the Opportunity Area.	No further change
Annex 1 supplement		Newham	Clarification that Core Strategy proposed release 77.3 ha 2012-2027.	Noted. SPG benchmark is indicative only and adjusted to allow scope for further potential consolidation 2027-2031 at equivalent annual rate subject to further assessment	<b>See final Annex 1</b>
Annex 1 supplement		Sutton	Provided clarification relating to ELR update 2008 and site allocations in recent Site Development Policies DPD reflecting net loss of industrial land in allocations over the plan period. Confirmed that Sutton currently commissioning a new ELR.	Clarifications noted and indicative benchmark amended pending further local evidence in forthcoming ELR.	<b>See final Annex 1</b>
Annex 1 supplement		Tower Hamlets	LBTH welcomes GLA's land release approach and consideration of the borough's employment land study and adopted Core Strategy (2010). In light of the borough's Core Strategy, Managing Development – Development Plan Document (submission version May 2012), and emerging Fish Island Area Action Plan (submission version May 2012), LBTH does not have any objections on the land release bench mark for the borough.	Noted	No further change
Annex 1 supplement		Bromley	Clarified some errors in the local employment land study 2010 and confirmed that a new borough ELR study is due to be published shortly.	Clarifications noted and indicative benchmark amended. Noted further local evidence is forthcoming in ELR.	<b>See final Annex 1</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
Annex 1 supplement		Just Space	The 'integrated' benchmarks should be the product of objective assessment when there is a divergence between the indicative benchmarks and the proposed releases in local Employment Land Reviews/Local Plans. Eg. Greenwich. The Local Plan would release 82ha (up to 2027), the draft SPG zero ha (up to 2031), whereas the 'integrated' benchmark is 50ha. Another example is Hillingdon - the integrated, benchmark (-1ha/a) is a much better fit with local evidence and opportunities than the draft SPG benchmark (- 3.3ha/a). But it is unclear how this change has come about.	The integrated benchmarks have been carefully considered taking into account the strategic and local evidence based in line with the NPPF. The integrated benchmark for Greenwich is mid-way between the strategic evidence and emerging local plan. An ELR is expected shortly and the benchmark for Greenwich can be caveated in the final SPG. Due to an anomaly in the strategic evidence relating to warehouse demand in Hillingdon, the integrated benchmark has placed greater weight on the local evidence (as amended - see response from CgMs Consulting).	<b>Add footnote to Annex 1 to state that the benchmarks of those boroughs indicated with an asterisk (*) are those most likely to be reviewed in the near future through forthcoming local Employment Land Reviews.</b>
Annex 1 supplement		CgMs Consulting	Regarding the proposed land release figure for Hillingdon. CgMs studies support the GLA's original figure of 66ha. We note that it is now proposed to reduce this to 20 ha, close to the 17.3ha identified in Hillingdon's 2009 Employment Land Study. For reasons set out in statement, we believe the derivation of the 17.3ha figure to be fundamentally flawed.	Due to an anomaly in the strategic evidence relating to warehouse demand in Hillingdon, the integrated benchmark has placed greater weight on the local evidence. The final benchmark (- 1.3ha pa) adjusts for the mathematical error in the local ELR when applying plot ratios to the employment projections for industry and warehousing.	<b>See final Annex 1</b>
Annex 2		Havering	SPG should recognise that the Joint Waste DPD has been adopted and clarify how the indicative estimates of the likely future land requirement for new waste facilities up to 2031 has been derived. It would be helpful for the SPG to clarify the purpose of these estimates and how they relate to the waste apportionments contained in the London Plan.	Noted - clarification can be provided in final SPG	<b>Insert "Source: RTP, 2012 / GLA" and clarify that the figures "...are based upon assumptions of the average throughput of different mix of facilities as reported by relevant waste authorities."</b>

Draft SPG Reference	Page/para	Respondent	Comment	GLA Response (noted, agree)	Amendments to Final SPG (with new references)
Part B		Havering	Encouraging that the document highlights the importance of safeguarding land for transport uses, protecting existing transport infrastructure and seeking improvements as part of the development management process	Noted	No change