

Draft New London Plan Examination in Public Statement

Federation of Small Businesses (2734)

MATTER: M60

Low Cost and Affordable Business Space

M60. Are policies E2 and E3 justified and would they be effective? In particular:

- a) Are they necessary to address the strategic priorities of London, or do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?
- b) Would they be effective in helping to ensure that the accommodation needs of all micro, small and medium sized businesses, including those wishing to start up or expand, could be met in all parts of London?
- c) Or would that objective be better achieved by market forces in the context of other policies in the Plan, including E1A, E4A, E4H, E5C and E6, as well as any relevant policies in local plans and neighbourhood plans?
- d) How would policies E2 and E3 affect the implementation of policy GG5 "growing a good economy"?

We welcome the inclusion of creative and artist studio space, but wish to stress that workshop and light industrial space should also be included as there is no justification for singling out some categories of economic activity while excluding others.

The measures in E2 and E3 are necessary as there is still a significant concern amongst small businesses, particularly in outer London boroughs, where we are losing business space to residential through Permitted Development Rights, thus making the cost of commercial space in particular areas more sought after through lower supply. Policies E2 and E3 will put an added layer of protection to help councils who can do little to stop PDR in their particular boroughs.

We are still concerned that **E2 (C)** does not put enough pressure on landowners, who are creating at least 2,500 sqm of space, to create designated space for micro and small businesses who often require smaller floorspace as a result of the cost of high rents and business rates that are driving small firms from the centre of London. We argue that that the word 'should' in the text be changed to 'must' and the word 'significant' be placed before the word 'proportion'