

DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC

Statement on Matter M60

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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”?

The need for low-cost and affordable workspace is a London-wide, strategic matter – the need both to provide, maintain and protect the supply of “entry-level” workspace for existing and new start-up small businesses and premises for voluntary and community organisations.

A lot of buildings that were used for those purposes have been converted to housing under the Government’s Permitted Development Rights which have been harmful to London. Many of the voluntary organisations which need work space are part of the social services in London.

The London Plan needs to provide leadership in this area as most local plans are silent on this issue. However, this issue needs to be developed further through local plans and neighbourhood plans.

- a) **Yes London Forum strongly welcomes the coverage given to this issue in the New London Plan.**
- b) **Yes – affordable workspace is a vital strategic issue for London, which need greater articulation than currently given in local plans.**
- c) **No – the market does not address affordability very well without this kind of policy support – but it will need follow through in borough Development Plans.**
- d) **GG5 does not deal specifically with SMEs and start-ups and the need for affordable workspace – just the provision of sufficient space in the right locations. The role of SMEs and their need for affordable workspace is not covered.**

PROPOSAL: There should be a paragraph below Policy GG5, as follows:-
'A proportion of the employment space required will be for small and emerging enterprises, serviced offices, space for social service provision and other affordable workspace. Local Plans should identify and plan for those needs.'

Omission: Premises for voluntary and community organisations:

A major omission from Policy E3 is the need for premises for voluntary and community organisations. Although this could be interpreted as being covered (very obliquely) in Policy GG6 D and in the supporting text (para 5.1.9) to Policy S1: Developing London's social infrastructure, the specific problem of providing or protecting premises for voluntary and community organisations is not explicitly recognised in a policy. The use of ACVs to prevent the loss of social infrastructure that is valued by a local community or group is covered in para 5.1.5, but most organisations are renting their premises from public bodies and churches, or even in the open market.

London Borough local plans need to recognise that there is a need to "plan positively for the provision of community facilities" and to "guard against the unnecessary loss of valued facilities" as proposed in para 70 of the NPPF (2012).

E3 A 1) and para 6.3.1: Premises for voluntary and community organisations:

Premises for the voluntary and community organisations are often scarce and need protection. Many will be charities, but most planners (and the wider community) do not understand the difference between "charities" and voluntary and community organisations. Many charities do not require premises or, if they do, they may not be local organisations nor ones that deliver services. Local voluntary and community organisations who do need premises, need them in the locality.

Planning positively for the provision of such premises and guarding against the loss of such facilities, as proposed in Paras 69/70 of the NPPF

(2012) and repeated in paras 91/92 of the 2018 NPPF. This stresses the provision of community facilities, including meeting places.

The draft London Plan needs to reflect this – the need to plan for and protect existing premises for voluntary and community organisations - more specifically **in policies** than the current vague references, and also in the glossary definition of “social infrastructure”.

The “voluntary sector” is mentioned in:

- **Policy GG6 D:**
- **Policy S1: Developing London’s social infrastructure:**
Para 5.1.9: Voluntary and community groups often find it difficult to find premises suitable for their needs. Unused or underused facilities should be brought into use, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.
- **Glossary: Social Infrastructure: The definition/description does not explicitly mention premises for voluntary and community organisations.**
- **Glossary: The definition of “affordable workspace” mentions “social purposes”**

PROPOSALS:

Policy GG6 D: After “local infrastructure” add “, including premises,”

Policy E3 A 1): Add: “voluntary and community organisations” after “charities,”

Policy S1: Developing London’s Social Infrastructure:

SD1 A: add at end “,especially meeting places and premises for voluntary and community organisations.”

Para 5.1.3: Line 5: After “local community” add “and voluntary sector organisations”

Glossary: Social infrastructure: Line 5: after “informal recreational facilities” add “and premises for voluntary and community organisations.”

Glossary: Affordable workspace: Add “community” after “social”