

Representations on Matter M62 of the Draft London Plan on behalf of the Roca Investments Ltd (2780)

We write on behalf of our client, Roca Investments Ltd, further to our representations, specifically Matter M62 of the draft new London Plan which is currently released for consultation. We welcome this review of strategic planning policy.

Representations on Matter M62 (Land for industry, logistics and services)

We have set out our representations in specific reference to the parts of Matter M62 as listed below. Where no comments are made we have removed the relevant part.

M62. Are policies E4, E5, E6 and E7 consistent with national policy and would they be effective in helping to ensure that sufficient suitable land and premises are available to meet the quantitative and qualitative needs for all foreseeable types of industrial activity over the plan period? In particular:

c) Are the borough-level capacity categorisations (“retain”, “provide”, or “limited release”) set out in Table 6.2 justified, and would the proposed approach ensure a sufficient quantity of land and premises in different industrial property market areas?

k) How would policies E4-E7 affect the implementation of Policy GG4 “delivering the homes Londoners need”?

Whilst we note the importance of industrial land in supporting strategic logistics operations serving the capital we consider a more site specific localised approach should be applied when determining applications such as residential-led or other mixed use schemes located within industrial locations, SII, LSIS or non-designated sites.

ROCA have sites that are of low-grade former industrial sites which has little prospect of being redeveloped for a solely industrial use B1c- B2, B8 uses – particularly when the last uses have been more akin to uses falling within Class B1a lawful uses or creative uses. The character of these sites epitomises the shift in employment space comprising postwar low-scale and low-grade industrial buildings which have shifted away from traditional industry towards the arts, small scale B1 uses.

We consider that adopting a strategic plan-led approach to SIL release does not take into account the specific characteristics in relation to the ever evolving character of industrial/ commercial areas, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site. As such, whilst we appreciate a need to retain industrial floorspace, we consider this restrictive approach to SIL designation is counterproductive to the strategic aspirations of the London Plan and the local aspirations of the Boroughs, particularly where sites are clearly redundant or can deliver more appropriate employment, intensive and housing opportunities as part of co-location mixed use schemes.

Draft Policy E4 - Protection of Industrial Land

The draft London Plan goes further than the current plan in protecting against loss of industrial land, with a principle of ‘no net loss’ of industrial floorspace capacity.

We are concerned that the protection of industrial land in locations where a blanket no net loss of industrial floorspace is inflexible and will hinder the delivery of mixed developments and consequently inhibit the ability to deliver the housing targets for London.

The draft wording of Policy E4 suggests that the opportunity for the release of such sites for other uses may not be appropriate, despite these sites potentially having no further use as an industrial function. Part C of Policy E4 states that the retention, enhancement and provision of additional industrial capacity across all types of industrial land should be planned, monitored and managed in accordance with the London wide management of floorspace capacity which is based on individual Local Planning Authorities (LPAs). This does not take into consideration site-by-site factors such as the ever evolving character of the area, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site.

Only 3 out of the 35 LPAs within London have been identified as suitable for 'Limited Release' of industrial land. Accordingly, this indicates that the release of industrial land for intensification, co-location or substitution in accordance with Policy E7 will be difficult to achieve outside of these boroughs. We therefore consider clarity should be provided in respect to the practical application of intensification and co-location policies on a strategic London-wide level. The policy is all encompassing and consequently prohibitive – stifling opportunities to redevelop for improved industrial uses.

The draft policy remains onerous to allowing the best use of previously developed land and is not supported in its current drafting.

Policy E7 – Intensification and Co-Location

Roca supports the Mayor's recognition of the ability of industrial uses to be 'co-located' or mixed with residential through intensification. Policy E7 states that intensification of SIL and LSIS should only be considered on sites that have been specifically identified through a plan-led process or as part of a co-ordinated masterplanning process. This conflicts with the wording of policy E4 which indicates that the release of industrial land to other uses should be confined to those LPAs as outlined in draft policy E4 and intensification and co-location can only take place in those boroughs identified for 'limited release'.

Co-Location

We consider the wording of the employment policies within the draft London Plan remain restrictive and detrimental to the delivery of much needed and increased housing targets for London, where sites are wholly capable of delivering both as part of co-location and mixed use. . Whilst we welcome the promotion of intensification and co-location we consider the ambiguity around the designation of such areas restrictive which do not fully take into consideration matters which are site-specific.

Industrial sites present the greatest opportunity to deliver large-scale mixed use development schemes in London. The blanket no net loss of industrial floorspace is highly inflexible and will hinder the delivery of large-scale mixed use schemes and the overarching intent of Policy GG4 to significantly increase the number of homes to be provided across the lifetime of the plan.

We remain concerned that the proposed retention of SIL land through greater London could hamper the ability for Boroughs to meet their current and planning housing targets.

Overall we do not consider that the New London Plan has accurately assessed the relationship between residential accommodation as supported by policy GG4 and the implications of policies E4-E7. The specifics of the policy means that for many Boroughs large areas of land which previously would have been identified for redevelopment cannot be brought forward without the release of SIL.

It is clear, without sufficient levels of land available the targets of policy GG4 will not be met.