

**Decision Maker:**      **Development Control Committee**

**Date:**                      **3rd April 2012**

**Decision Type:**      Non-Urgent                      Non-Executive                      Non-Key

**Title:**                      **LONDON PLAN DRAFT SUPPLEMENTARY PLANNING GUIDANCE - LAND FOR INDUSTRY AND TRANSPORT**

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**Chief Officer:**              Bob McQuillan, Chief Planner

**Ward:**                      Borough-wide

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**1.      Reason for report**

- 1.1      The Mayor of London has produced a draft Supplementary Planning Guidance (SPG) on Land for Industry and Transport. The document covers a number of areas including managing industrial land and premises, providing public transport capacity and safeguarding land for transport. The SPG is currently out for consultation until 23<sup>rd</sup> April 2012.
- 1.2      A copy of the document has been placed in the Members room for information and is also available online at <http://www.london.gov.uk/publication/land-industry-and-transport-spg>
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**2.      RECOMMENDATION**

That Development Control Committee:

- (1)      Notes the publication of the draft Land for Industry and Transport SPG, and
- (2)      Agree that the points included in the report paragraphs 3.19 – 3.25 form the basis of the Council's response to the consultation and that the Chairman agrees the final response in consultation with the Chief Planner for submission by the 23<sup>rd</sup> April deadline.

### Corporate Policy

1. Policy Status: Existing policy.
  2. BBB Priority: Excellent Council.
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### Financial

1. Cost of proposal: N/A
  2. Ongoing costs: N/A.
  3. Budget head/performance centre: N/A
  4. Total current budget for this head: £N/A
  5. Source of funding:
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### Staff

1. Number of staff (current and additional): N/A
  2. If from existing staff resources, number of staff hours: N/A
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### Legal

1. Legal Requirement: No statutory requirement or Government guidance.
  2. Call-in: Call-in is not applicable.
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### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough-wide.
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### Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments: N/A

### **3. COMMENTARY**

#### Draft SPG Main Points

- 3.1 The draft SPG sets out proposed guidance to supplement the policies in the London Plan (2011) relating to land for industrial type activities and transport. It provides advice on how to implement these policies, in particular London Plan Policy 2.17 on Strategic Industrial Locations, Policy 4.4 on Managing Industrial Land and Premises. These policies are detailed in Appendix 1.
- 3.2 The SPG provides guidance on industrial land requirements as well as on possibilities, appropriate processes and suitable locations for release of any surplus industrial land. The guidance further discusses how the requirements of different sectors can be addressed to enhance their competitiveness, giving particular attention to meeting the needs of different forms of transport, and to carrying forward the Mayor's broader concerns for improvements to the overall quality of London's environment by emphasising the importance of good design for industrial development.
- 3.3 The second part of the SPG seeks to ensure that there is a sufficient supply of land for (predominantly passenger) transport uses in London. It is recognised in the London Plan that transport plays an essential part in keeping the city prosperous economically and socially. Ensuring that land is available for transport functions close to the market it serves helps reduce the cost of provision, improve reliability and reduce transport's energy consumption.
- 3.4 Once adopted, the new SPG on Land for Industry and Transport will replace the SPG on Industrial Capacity (March 2008) and the SPG on Land for Transport Functions (March 2007). The SPF document does not set new policy, but rather explains how policies in the London Plan should be carried through into action. It will assist boroughs when preparing Development Plan Documents (DPDs) and will also be a material planning consideration when determining planning applications.
- 3.5 Structural change in the London economy over recent decades has led to a shift in employment away from traditional manufacturing industries and into the service sector. However, over the plan period for the London Plan (2011-2031) there will be increasing demand for industrial land from a range of other important industrial type functions. These include an efficient and sustainable land supply for logistics, waste management, recycling, environmental industries including renewable energy generation, transport functions, utilities, wholesale markets and some creative industries.
- 3.6 Through its planning policy framework, the Council is required to prepare and maintain a robust evidence base to ensure an adequate stock of industrial capacity to meet the future needs and functional requirements of different types of industrial and related uses, including that for good quality and affordable space. This is to be implemented by adopting the 'Plan, 'Monitor and Manage' approach to the release of surplus industrial land so that it can better contribute to strategic and local planning objectives. Boroughs are encouraged to take into account a three-stage approach: taking stock of the existing situation, creating a picture of future requirements, and identifying a new portfolio of sites.
- 3.7 Accurate monitoring of the demand and supply of industrial land has a crucial role to play in a situation where overall land supply in London is finite and competing demands on it are strong. In managing and reviewing industrial capacity, account

should be taken of the scope for consolidating industrial capacity at particularly appropriate locations. This should be considered in the light of strategic and local assessments of industrial land demand and supply (quantitative and qualitative) and must be informed by a robust appreciation of short and longer term market trends and policy guidance. Land released as a result of such consolidation exercises must be re-used to meet strategic as well as local priorities.

### Strategic Industrial Locations and other Industrial Provision

3.8 Section 1.2 refers to the sources of housing supply including :

3.9 London Plan Policies 2.17 and 4.4 set out a plan-led approach to promoting and managing industrial capacity through three types of location:

- **Strategic Industrial Locations (SILs)** – a resource that must be sustained as London’s main reservoir of industrial capacity but nevertheless must itself be subject to periodic review to reconcile demand and supply.
- **Locally Significant Industrial Sites (LSIS)** - protection of which needs to be justified in assessments of supply and demand for industrial land and identified in Development Plan Documents (DPD); and
- **Other smaller industrial sites** that historically have been particularly susceptible to change. In some circumstances these sites can better meet the London Plan’s objectives in new uses, but in others will have a continuing local and strategic role for industry. This sub-category is likely to continue to be the area of greatest change

3.10 To meet the needs of different types of industries, the London Plan identifies two broad categories of SIL:

3.11 **Preferred Industrial Locations (PILs)** are suitable for firms that have less demanding environmental requirements and typically fall within the light industrial, general industrial and storage and distribution Use Classes (B1(c), B2 and B8 respectively). They are also suitable for waste management, recycling, environmental uses (including renewable energy generation), utilities and some transport-related functions such as rail and bus depots and inter-modal freight facilities.

3.12 **Industrial Business Parks (IBPs)** are for firms that need better quality surroundings and typically include activities such as research and development (B1b), light industrial (B1c) and high value-added general industrial (B2). Generally they require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in PILs.

### Strategic Industrial Locations in Bromley

- St Marys Cray (IBP) (which accounts for 41% of all designated business area floorspace in the Borough).
- Foots Cray Business Area (IBP) (which borders Bexley).

3.13 Detailed boundaries of SILs are for identification on DPD proposals maps. Boroughs may designate as 'Locally Significant Industrial Sites' those which lie outside the SIL framework but which robust assessments show to warrant protection because of their particular importance for local industrial type functions.

Boroughs should make explicit in DPDs the type of uses considered appropriate in LSIS.

- 3.14 The draft SPG reaffirms Bromley's ranking as 'restricted' for the transfer of industrial land to other uses. Boroughs in this category typically have low levels of industrial land relative to demand (particularly for waste management or land for logistics) and/or low proportions of industrial land within the SIL framework. Boroughs are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses. This does not preclude the possibility of smaller scale release where boroughs have made adequate provision for industrial land in their DPDs in particular for waste management and logistics uses.
- 3.15 The Council will also have to consider guidance on industrial capacity and mixed-use redevelopment of surplus industrial land (as defined in borough assessments) which can help meet strategic and local requirements - including the delivery of housing and in appropriate locations, social infrastructure and contribute to town centre renewal. The variety of industrial capacity and provision for small and medium sized industrial enterprises will have to be considered, along with consideration for the quality of industrial capacity (including innovative approaches to intensification).
- 3.16 The draft SPD restates the parking standards set out in The London Plan. In its response to the Draft London Plan the Council indicated that the car parking standards were insufficiently flexible to support the economic vitality of outer London town centres. This is partly because the standards relate to PTALs, and the Council's view is that the PTAL system does not adequately address accessibility issues in relation to outer London town centres. The Council will use the limited flexibility provided by these standards to ensure that, as far as possible, new developments do not generate additional intrusive or obstructive on-street parking as a result of inadequate on-site provision. The Council understands that the Outer London Commission is continuing its review of parking in Outer London recognising its greater reliance on cars than inner London and the need to consider this in ensuing economic competitiveness. It is hoped that the final SPG will reflect the needs of Outer London in this respect.
- 3.17 The Council also places requirements on developers through the planning process to provide stipulated numbers of dedicated off-street parking places for disabled staff and visitors in new developments. The UDP sets out standards for disabled parking provision in new developments, and more generally the Council applies the standards for disabled parking in developments as set out in the London Plan.
- 3.18 Electric Vehicle Charging Points: The Council will ensure in general terms, that new developments minimise the impact of travel on the environment through requiring the provision of a minimum number of EV charging infrastructure in new developments as set out within the London Plan.

#### Council Suggested Response

- 3.19 The Council welcomes the opportunity to comment on the draft SPG. The recognition of the importance of retaining industrial land is welcomed. Members of this committee have raised concerns that industrial land and broader employment land needs to be protected and this draft SPG reaffirms this approach, subject to a robust evidence base.

- 3.20 The Council notes the importance of a ‘plan monitor and manage’ approach to industrial land - it is important that land for employment purposes, which is vital to the continued economic success of the Borough, is not lost due to the pressure to provide increasing amounts of land for housing uses.
- 3.21 There are a number of issues surrounding the provision of housing on industrial and commercial locations, particularly the impact that commercial activities could have on local residents. These factors will need to be carefully considered by the Council before decisions are made regarding sites. It is noted that housing should be developed in locations appropriate for that purpose and the Council should not be pressurised into developing housing in locations that they believe are inappropriate.
- 3.22 The London Plan already gives SIL designation to the St Marys Cray and the Foots Cray Business Areas for the Borough to identify their boundaries on the DPD proposals map. The additional ability to designate industrial land as ‘Locally Significant Industrial Sites’ (subject to robust assessments) is welcomed to enable protection of industrial land which is of local importance. This discretion is considered necessary and the Council considers itself best placed to make these decisions.
- 3.23 The draft SPG sets out three groups of criteria to be used alongside London Plan Policy when considering site specific allocations for industrial land in DPDs (as SIL or LSIS) and when developing criteria based policies to manage other smaller non-designated sites. The criteria are based on general economic factors, land use factors and indicators of industrial demand. It is felt the criteria give the Council sufficient flexibility and scope to ‘plan, manage and monitor’ industrial land and so the Council welcomes this approach.
- 3.24 The Council asks that the Outer London Commission’s work understanding the particular needs of Outer London , in particular with regard to parking as it relates to this SPG will be reflected in the final version enabling authorities to take full account of local circumstances.
- 3.25 Overall, the Council supports the draft SPG as it reinforces the London Plan policies on industrial land, which Members considers of strategic importance to the Borough.

<b>Non-Applicable Sections:</b>	Financial, Legal and Personnel Implications
Background Documents: (Access via Contact Officer)	The London Plan 2011

## **Appendix 1**

### **London Plan Policy 2.17 Strategic Industrial Locations**

#### **Strategic**

**A.** The Mayor will, and boroughs and other stakeholders should, promote, manage and, where appropriate, protect the strategic industrial locations (SILs) designated in Annex 3 and illustrated in Map 2.7, as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions.

#### **Planning decisions**

**B.** Development proposals in SILs should be refused unless:

- (a) they fall within the broad industrial type activities outlined in paragraph 2.79
- (b) they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document
- (c) the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or
- (d) the proposal is for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.

**C.** Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities.

#### **LDF preparation**

**D.** In LDFs, boroughs should identify SILs on proposals maps and develop local policies based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements.

### **London Plan Policy 4.4 Managing Industrial Land and Premises**

#### **Strategic**

**A.** The Mayor will work with boroughs and other partners to:

- 3. adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space
- 4. plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

## **LDF preparation**

**B.** LDFs should demonstrate how the borough stock of industrial land and premises in strategic industrial locations (Policy 2.17), locally significant industrial sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2, taking account of:

- (a) the need to identify and protect locally significant industrial sites where justified by evidence of demand
- (b) strategic and local criteria to manage these and other industrial sites
- (c) the borough level groupings for transfer of industrial land to other uses (see Map 4.1) and strategic monitoring benchmarks for industrial land release in supplementary planning guidance
- (d) the need for strategic and local provision for waste management, transport facilities (including inter-modal freight interchanges), logistics and wholesale markets within London and the wider city region; and to accommodate demand for workspace for small and medium sized enterprises and for new and emerging industrial sectors including the need to identify sufficient capacity for renewable energy generation
- (e) quality and fitness for purpose of sites
- (f) accessibility to the strategic road network and potential for transport of goods by rail and/or water transport
- (g) accessibility to the local workforce by public transport, walking and cycling
- (h) integrated strategic and local assessments of industrial demand to justify retention and inform release of industrial capacity in order to achieve efficient use of land
- (i) the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.