

## **Matter 5 – Planning for the economic prosperity of the Borough including employment sites and town and local centres**

**Issue 1: Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to economy and employment.**

5.1 What is the evidence in relation to jobs growth and the need for employment land/floorspace in the Borough over the plan period (i.e. to 2033)? What does it show? Is the employment land evidence base sufficiently up to date to provide a robust basis against which the policies in the plan have been prepared?

5.2 What is the overall scale of employment development envisaged by type, is this sufficiently clear and is it justified?

5.3 Are the floorspace figures in SP1b expected changes in floorspace? Or are they intended to be targets? Should the plan be clearer as to what the overall quantum of employment land and floorspace proposed to be allocated through specific sites should be?

5.4 Is the plan sufficiently clear as to the amount of office and general industrial floorspace that the plan intends to allocate or identify?

5.5 Have any alternative options for the distribution of new employment development been considered? If so, what are they?

5.8 Are main modifications necessary to any of the employment policies for soundness?

5.9 Does the plan provide for sufficient employment land of a range of types to meet identified needs?

5.10 Is the proposal to co-locate industrial premises with new homes justified and consistent with the London Plan?

5.15 Is the policy overall justified, effective and consistent with national policy? Is it necessary for soundness that the NSP should only allow for co-location of residential on strategic protected industrial land (including LSIS) through the Plan's allocations?

5.20 Is the policy sufficiently flexible to respond to changing economic circumstances?

### **Issue 2: Ensuring the vitality of the Borough's Town and Local Centres**

5.37 What is the scale of each type of main town centre uses proposed and are these justified?

5.39 Should the network and hierarchy of town centres included in the reasoned justification of P34 be identified as a strategic policy? Does it accord with the Framework?

5.42 What effects do the changes to the Use Classes Order (September 2020) have on each of the town centre and shopping policies, particularly in regards to the newly created 'Class E'?

5.43 Are any main modifications required to the town centre and shopping policies, particularly in light of the changes to the Use Classes Order?

Relevant policies / evidence:

- Publication London Plan 2020,
  - Policy GG5 Growing a Good Economy: H (Circular Economy)
  - Policy GG6 Increasing efficiency and resilience: A (Circular Economy)
  - Policy E5 Strategic Industrial Locations (SIL)

- Policy E6 Locally Significant Industrial Sites
- Policy E7 Industrial intensification, co-location and substitution (including Fig 6.3)
- RICS Q3 2020: UK Commercial Property Market Survey
- GLA Covid-19 Mobility Report: Working from home in London
- We Made That Industrial intensification and co-location study: design and delivery testing 2018

The employment land evidence base including the background papers on industrial land, offices and retail do not provide an up to date or robust basis for the plan. There is mention in the Industrial Land Background Paper of an OKR Business survey (2019) however this is not explained or published and in any case is limited in its scope and geography relative to the large gaps in the evidence base. Responses to representations have focussed on restating the need for office space however a fundamental flaw in the plan is the conflation in the evidence of office space with other uses including industrial which is fatal for the borough's local economy (where in almost all settings office development dominates with higher rents) and makes the plan unsound in relation to the London Plan both strategically and in terms of current figures. Meanwhile evidence shows the growing trend for people to work more from home, for a lower demand in office space and an increased demand for light industrial provision which is essential for the support of the circular economy, however the current applications for large office and housing developments across the borough (in areas of dramatic change like London Bridge and OKR) are not actually designed for flexible use or colocation - nor do the targets take account of the uncertainty regarding the Bakerloo Line.

The responses also focus on protected high street frontages but there is no acknowledgement of the scale of the present lack of protection or of the urgency of the need for a borough wide audit of the economy to understand the importance of the depth structure of highstreets in supporting the diversity of the local economy (and the economic social and environmental value of local networks). Many more 'town centre' designations should be made for currently unregistered highstreet settings and the plan could be made less unsound by invoking article 4 in these areas to avoid the permitted development rights for change of use that will result in the continued shrinkage of accommodation for the borough's economy.

The proposed SPL and LSIS in the plan ignore a huge part of the economy. Maps 1 and 2 in the industrial land background paper should be scaled together and put in direct overlay to illustrate more clearly the 50% loss of strategic protection being proposed. The apparent slight gain in local provision is misleading as it provides in reality no ratio/mechanism for controlling change to office and other uses and is based on an as yet ambitious but untested idea of colocation which should be genuinely investigated to be justified and in line with the advice in the London Plan and the latest studies (WeMadeThat 2018). An SPD should have been begun upon on how colocation/mixing of many use combinations in different settings, scales could support sustainable development in Southwark - this is not currently evident in the OKR Masterplans.