

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

Introduction

I am Mark Brearley, following through with representations on the NSP made on behalf of the Vital OKR business association.

I am the proprietor of the 74 year old Peckham manufacturing business Kaymet that employs 12 people and holds a Royal Warrant, and last year received a Queen's Award for Enterprise in recognition of fast export growth. I was one of the initiators of the Vital OKR business association. I am also Professor of Urbanism at London Metropolitan University, where I help to coordinate the Cities research and teaching unit in the School of Architecture, Art and Design. I have expertise in the urban economy, with particular focus on high streets and industrial activity. In 2019 I held the BSI-Citydev Inter-university Chair (Brussels) with a chosen concentration on the theme *A good city has everything*. Ongoing since 2015 I have been Ateliermeester for the *Atelier Brussels Productive Metropolis* initiative, on behalf of the state governments of Flanders and Brussels. I am a member of the recently established Commission on the Future of Industrial Land in London. I worked for the Mayor of London from 2001, leading the Design for London team for the 5 years until 2013, a role that included initiating the Mayor's high street focused research and project work, area economy audits, and the London-wide mapping of industrial activity.

Vital OKR is an association, with somewhat over 300 members, that has emerged in recent years to give a stronger voice to the businesses in the Old Kent Road area of Southwark, and has increasingly spoken up for the interests of the wider industrial economy of Southwark. In the Old Kent Road area we have strong industrial enterprises, most of them focused on serving inner and central London's just-in-time supply, servicing and production needs, we have a fast expanding cluster of creative enterprises, niche and craft producers, many builders merchants, vehicle repair and hire garages, diverse retail, several thriving high street settings and a dynamic faith community.

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

Issue

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.

Relevant Policies – SP1a, SP1b, SP4 – P43 Questions

Economy and Employment in general (SP1a, SP1, SP4)

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?

The Council do not have an adequate understanding of the industrial economy across Southwark nor the land and accommodation it occupies, nor the changes that have been taking place, and the permissions granted over recent years that will allow loss. The evidence base is woefully inadequate. Furthermore, studies that have been produced on behalf of Southwark, and extensive evidence and quantum guidance provided by the GLA has been ignored. The consequences of the plan for the borough's industrial economy, the likely land and accommodation quantum outcomes during the plan period, have not been assessed.

Please refer to my Appendix VOKR5 for my summary of issues as understood a couple of years ago, as presented in my original representations on the plan (paragraphs that are not easily available to view elsewhere).

I highlight the following selection of indicators of fundamental flaws:

The Council appear to have not properly engaged with the process of verifying the 2014 industrial land baseline mapping, when it was being produced by consultants on behalf of the GLA, hence the baseline against which industrial land quantum changes are measured, is substantially inaccurate. Please refer to my Appendix VOKR11 for a fuller explanation, and maps indicating the scope of the errors across an example area.

Full monitoring of industrial land and accommodation loss, as required by the London Plan, has not be carried out by The Council, rather they have relied on LDD data, thus failing to take account of all approvals. Reviewing the end 2014 situation, and what's happened since, by checking planning approvals, we noted 105 relevant permissions, of which only 34 were recorded in the LDD. The omissions are mostly small sites. The error totals around 11.3 ha. Please refer to my Appendix VOKR3 for further details.

The Council have failed to assess the current industrial land situation across the borough, and they seem to be unaware that as at the end of 2020 the actual + pipeline loss of industrial land had already exceeded GLA recommended maximums for the period up to 2041 by 24 ha. There has been no assessment of the likely consequences of the plan as a result of the limited extent of designation, and policies, including those for Site Allocations, that fail to require re-provision. Please refer to my Appendix VOKR3 for further details.

The Council's LDD based assessments ends in April 2019, thus missing a further 34 development schemes covering 6.04 ha of industrial land, and even this incomplete assessment (incomplete because limited to LDD and not up to date) only shows floor space, ignores yard space, and does not show hectares. The Council also fail to total the industrial floor area nett loss (completions + approvals). The loss shown on their incomplete schedule alone adds up to around 260,000 sq m.

5.2

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

The Council's insistence on avoiding any differentiation between office and industrial accommodation makes the scale of provision, and the response to need, unclear. There is no indication in the plan of overall quantum of industrial accommodation required. In fact very little is required by the plan, regardless of strong evidence of need.

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?

The plan does indeed need to be clear about overall quantum of industrial floor space, and of yard space, and of hectares of industrial land, in relation to need. The plan offers no clarity.

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?

The plan does not indicate amounts of industrial floor space, nor yard space, that it's intended to allocate and to protect (or seek to intensify) through designation and / or policies. On these matters the plan is a fog.

5.5

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

No evidence of any alternative options has been presented, and in spite of many years of listening I have heard no mention of any other options having been considered. It seems that the only option that has been considered is the one in the plan, and that would likely result in catastrophic loss of industrial accommodation, a shrinkage to less than 30% of the current land extent, resulting in a massive failure to meet well understood need.

5.6

Should the plan be clearer as to the requirements for floorspace within particular planning designations e.g. CAZ, AAP areas, town centres and elsewhere

This is indeed needed.

5.7

What effects, if any, do the changes to the Use Classes Order (September 2020) have on the employment policies?

The introduction of E Class will allow a significant quantum of industrial accommodation to change to such uses as retail, restaurant and café, assembly and leisure, non-residential institutions. It is reasonable to assume that this will magnify shortages of industrial accommodation and accelerate the annihilation of the industrial economy across most of the borough. It would be appropriate to call for a radical review, in the context of a proper assessment of Southwark's industrial accommodation challenge, and consideration of how the plan could respond to that challenge.

5.8

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

A fundamental review of policies, designations, and Site Allocations, is necessary in order to achieve soundness. I have made a series of suggestions in my representations.

SP4 - Strong local economy

5.9

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

The plan woefully fails to provide sufficient land (and thus accommodation) for industrial activity in order to meet identified needs. Please refer to my Appendix VOKR3 in which I set out the current situation with industrial accommodation across Southwark, and the likely consequences of the plan.

I mention here that I am part of a team (largely voluntary) that is currently putting together the results of a comprehensive audit of Southwark's industrial economy and accommodation. The results have been delayed because we had to await information gathered on behalf of Southwark covering the Old Kent Road area (we focused on the rest of the borough), and that information was inexplicably withheld for a year (we only received it recently). We expect our results to be available in March. Until then the topic remains somewhat abstract, but I emphasise that the industrial economy across Southwark remains substantial and diverse, and the risk of worsening accommodation shortages threatens diverse enterprises and the livelihoods of thousands of people.

For a taster of the tangible reality of the borough's industrial economy I urge you to view my Appendix VOKR7, being a celebratory booklet produced a couple of years ago titled 'Old Kent Road Manufactures'.

I ask that you look at my Appendix VOKR2 for insight into the effects of the current pressures on industrial accommodation, and the likely consequences of the plan, on builders merchants in Southwark, one niche slice of the industrial economy.

I ask that you look at my Appendix VOKR6 containing observations on industrial rents in Southwark, as further evidence of shortage, of un-met need.

I refer you to my Appendix VOKR4 containing the transcript of a September 2017 London Assembly Planning Committee session on industrial land in London, as this offers an excellent introduction to the issues and the challenges, with several experts contributing.

I ask you to note the following key facts (drawn from my Appendix VOKR3):

Loss of industrial land from Southwark since 2011 has been 46 ha, a 30% reduction.
Loss over a longer period, since 2001 (20 years) has been 45%.

But there is strong demand, rents are escalating, the owner-occupier market has evaporated, there are alarmingly low vacancy rates, expulsions and evictions are increasing.

GLA guidance on the maximum acceptable loss of industrial land in Southwark up to 2041 has already been exceeded by 24ha (current actual + pipeline loss at end 2020). That's before any further loss that would be allowed / endorsed by the plan.

The plan would allow further shrinkage of industrial land to just 52 ha.

If that happened then the shrinkage in 20 years would have been 147 ha, a 74% loss from the 2001 total of 199 ha.

Such a loss would exceed the GLA guidance on acceptable maximum loss between 2001 and 2041 by 81 ha, close to four times the loss assessed as acceptable and offered as guidance on need to the Council.

5.10

[Is the proposal to co-locate industrial premises with new homes justified and consistent with the London Plan?](#)

The proposal is good in principle, but this is a relatively un-tried approach. In order for such an approach to deliver the required quantum of suitable industrial accommodation, its scope must be much broader, covering many areas that are not currently industrial, and more sophisticated guidance and policies are needed, coupled with the introduction of new skills into the Council's planning team. There is no indication in the plan that the Council understand the scale of the challenge, nor that they are committed to taking on that challenge. In such circumstance it is appropriate to anticipate substantial net loss of industrial accommodation from co-location areas (LSIS), to stop pretending that no net loss in those areas is achievable.

[P28 - Strategic protected industrial land](#)

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?](#)

The policy is woefully inadequate as it only affords protection to less than 30% of the borough's current total of viable (predominantly occupied) industrial land. The policy of allowing co-location of industry and residential in LSIS areas may be reasonable, but the challenges of achieving suitable development are substantial, and Southwark's record to date is not strong. The lack of an LSIS policy is surprising. It must be recognised that co-location will generally result in net reduction of industrial, it is not compatible with industrial intensification, and hence that heightens the need for more extensive areas of SIL designation, and a much broader application of a requirement for incorporation of industrial accommodation when sites and areas are redeveloped. In order to meet well defined needs the requirement for co-location of industrial accommodation should extend far beyond currently industrial sites. The scope needs to include residential developments elsewhere, as well as office developments, even education and other use type developments. The challenge needs to be taken on properly and with inventiveness. But the plan has not done this, indeed it has ignored the challenge, seems to deny its existence.

I ask that you refer to my Appendix VOKR13 that contains email correspondence with GLA and LBS about the Ruby Triangle major development scheme on the Old Kent Road, this being a good example of the failure to deliver credible industrial accommodation where co-located with residential. The light industrial accommodation in that now consented scheme (within a current area of SIL), is 'industrial' by labelling only, part of tick-box exercise to keep the Council happy. In no way is its design and location suitable for industrial occupiers, and I am sure that, if built, it will rapidly welcome a range of non-industrial E Class uses.

5.17

[Does the policy allow for business growth that may not result in a net increase in jobs \(i.e. for automation\)?](#)

The plan fails to allow for industrial business growth, disregards the need for many millions of sq ft of industrial accommodation.

[P29 - Office and business development](#)

[5.18, 5.20, 5.21, 5.22](#)

I urge you to refer to my representations on this topic and the policy.

[P30 - Affordable workspace](#)

[5.22, 5.23, 5.24, 5.25, 5.26, 5.27, 5.28, 5.29](#)

I have urged, on behalf of Vital OKR, the deletion, or a substantial re-draft, of this policy, as it is likely that it would be counter-productive, in many cases difficult to make viable, and would cause substantial fairness issues. It seems clear that the policy was conceived with office development in mind, not industrial.

I ask that my careful representation of this policy be referred to.

I also ask that you see my Appendix VOKR12 that includes an 11th August 2019 email from me to Cllr Stephanie Cryan (response still awaited) regarding this and related policies, incorporating my representations on those policies, and highlighting some evidence of problems.

I highlight the fact that the Council's document 'Housing and affordable workspace policies further viability sustainability testing' (SP109) indicates that for accommodation priced at £35 per sq ft and less (hence all industrial accommodation) a policy requiring 10% of space to be affordable (25% discount from market rents) would significantly impact viability. See Table 3.39.1, and para 3.40 where it is stated: 'We note however, that our testing of schemes at the rent scenario of £35 per sq ft has identified significant impact'.

I suggest that, should the policy be retained, it could be amended such that where commercial accommodation is clearly suitable for / intended for industrial use, and where planning conditions will limit it to such use, then the affordable workspace policy should not apply. This could provide a useful incentive to the development of new industrial space. I emphasise that suitability and quantum of industrial accommodation is the key challenge. If type and quantum came closer to what needs suggest, then affordability would look after itself, and unfairness consequences could be avoided.

P32 - Business relocation

5.31

Is the policy justified, effective and consistent with national policy? Taking each criterion in turn, are the requirements justified and supported by evidence?

This policy, if it could be made effective, could be a good-to-have, though it should be noted that it is not a substitute for the Council playing a proper role in assisting sections of the borough economy that are experiencing intense displacement pressures, in some cases including intimidation. And it cannot make good the consequences of severe under supply of high street setting accommodation, industrial and lower cost office / studio space. Those consequences must be addressed by making a plan that can realistically respond to evidenced needs. The plan fails to do that.

I ask that my careful representation on this policy, including suggested changes to the wording, be referred to.

I also ask that you see my Appendix VOKR12 that includes an 11th August 2019 email from me to Cllr Stephanie Cryan (response still awaited) regarding this and related policies, incorporating my representations on those policies, and highlighting some evidence of problems.

5.32

At what stage in the planning process is a business relocation strategy required to be provided and how would it be secured?

The policy will not be effective, indeed has already proved to be ineffective, if it is not clear that a business relocation strategy must be submitted with a planning application, and that the assessment of current accommodation and occupation must take place at the time of first inquiry (hence at pre-application stage).

5.33

Should the policy require consideration of the market value of businesses as part of relocation strategies?

Yes, it should.

P33 - Railway arches

5.34

Is the policy justified, effective and consistent with national policy?

I ask that my careful representation of this policy be referred to.

In the light of escalating shortages of industrial accommodation, the current majority of the borough's approx. 800 railway arches that are in industrial use / suitable for industrial use should be designated as SIL (part of a borough wide expansion of SIL designations to cover all appropriate locations) so that they can be reserved for B2, B8 and light industrial uses what are not compatible with residential.

The flexibility suggested by the policy, roughly equating to brushing all arches with an E Class permission, is fundamentally flawed as it disregards need and would likely cause substantial loss of enterprise.

Issue 2:

Ensuring the vitality of the Borough's Town and Local Centres

Relevant policies – SP1, SP1b, P34-P43

Town and Local Centres and retail development in general

5.36, 5.37, 5.38, 5.39, 5.40, 5.41, 5.42, 5.43

P34 - Town and local centres

5.44

I ask that my careful representation of relevance to Issue 2 be referred to.

Please note that the plan fails to recognise and inclusively designate a significant proportion of the borough's existing high street settings as Town Centres, and thus to protect them from development that could reduce non-residential capacity. Outside the CAZ only around 60% of the borough's high street settings are proposed in the plan for designation as Town Centres and thus potentially afforded appropriate protection (against displacement by residential) and policy clarity.

The Council have failed to properly assess the quantum of future need for high street setting accommodation across Southwark, in relation to existing quantum, and to designate and define the extent of town centres accordingly, with the aim of meeting future need, as well as current, by designating areas that have the potential to strengthen or emerge as high street settings.

We ask that it be noted that thus far permissions granted in the Old Kent Road area are failing to deliver the substantial increase in high street setting accommodation, in order to meet the need defined by the Council's studies, and a scattered pattern of what will be treated as E Class spaces is already

occurring, thus failing to achieve the stated objective of establishing a strong high street along the Old Kent Road. The Site Allocations do not require the necessary increase in accommodation across the area, and also fail to prescribe a good disposition. Hence the difficulties facing industrial businesses in the Old Kent Road area are also confronting high street setting uses, including retail. There is an escalating under supply of suitable space. There is no sign, in the Old Kent Road scenario in the plan, of being able to accommodate the likes of B&Q, Tesco, Asda, Selco, HSS, B&M, in the scale of premises they currently occupy, nor of scope to welcome civic uses (sadly the reverse is happening, with the likes of black majority churches being rapidly expelled). These are fundamental flaws in the plan.

End

Appendix VOKR5

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Extract from Vital OKR's representation on the NSP PSV and PSV with amendments
(merged version as requested by Southwark in May 2019, but then rejected because I had not deleted any representations):

These paragraphs provide general critique of the NSP approach to accommodating the economy, and the associated evidence base. I believe that these paragraphs were not been included in Southwark's documentation, presumably because they were introductory, and about general approach and evidence, rather than regarding specific numbered policy representations. Hence it feels appropriate to append them here for reference.

The paragraph numbering has been added now, for ease of reference.

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1.
Vital OKR is an association, with somewhat over 300 members, that has emerged over the past couple of years to give a stronger voice to the businesses in the Old Kent Road area of Southwark. In our chunk of the borough there is a diverse economy driven forward by close to 1,000 businesses who provide work for around 10,000 people. We have strong industrial enterprises, most of them focused on serving inner and central London's just-in-time supply, servicing and production needs, we have a fast expanding cluster of creative enterprises, niche and craft producers, many builders merchants, vehicle repair and hire garages, diverse retail, several thriving high street settings and a dynamic faith community.
2.
Notable amongst the challenges facing the economic life of our area is the constricting supply of suitable accommodation. While our enterprises are vital, there is not enough space for them to grow, and for others to be welcomed. The problem has become worse since the local planning authority signalled potential for large scale residential focused redevelopment right across the area, and has commenced a process of intense dialogue with larger land owners and potential developers, already resulting in 12 major development plan violating planning applications, some now consented. Alongside this process has come intense land trading, much uncertainty, rent escalations, plummeting lease lengths, and evictions. Our area is now experiencing the departure of business as a result of this process resulting in a net loss since the commencement of an AAP preparation process of net loss of around 170 businesses, 650 jobs.
3.
Our response has been to get busy raising awareness of the economy we have and the threats it faces, and to engage as best we can in the bewildering complexities of the planning system. We have been trying hard to open up a dialogue with Southwark Council, to persuade them that a good future for the Old Kent Road can be achieved without losing its current remarkable collection of businesses and its battered but strong civic life.
4.
Of course, we could not ignore the New Southwark Plan, and as we studied it we were struck by how the challenges the economy of our area faces, many of them the result of clumsy planning based on insufficient knowledge and weak understanding, have equivalents right across Southwark borough. We felt obliged to speak out, and therefore to make representations on the NSP as it affects the whole borough, not just the OKR area.
5.
We observe that the NSP has been prepared with reference to only a rudimentary, incomplete and outdated evidence base, without sufficient fine-grained assessment of what there is and what it can be predicted there will need to be, without significant consultation with enterprises and their people. We were struck by how inappropriate that is for a large borough within a city experiencing such intense growth challenges. While such clumsy planning might not have caused alarm a decade or more ago, when there was still plenty of available capacity for non-residential uses in London, today the situation is very different. GLA assessments have shown that our city is now expected to face a several hundred hectare shortage of industrial capacity, and that some 70% of London's high streets are potentially particularly vulnerable to development pressures as they lie outside town centre designations. These are amongst the indicators that, along with market signals such as fast rising rents and purchase costs, remind us that the balancing of competing claims for space must be a central focus of planning.
6.
Our own review of the NSP led us to believe that its consequences for the Borough's economy as a whole would be destructive and constricting, that it fails to show how the full range of accommodation requirements can be met (as does the evidence offered to support it), that

it also fails to offer adequate protection for huge quantities of accommodation that is vulnerable to replacement by residential now that such use commands the highest value in the majority of locations, and it fails to how set out a coherent strategy to nimbly manage competition for space.

7.

We believe that the NSP PSV (with amended policies) is unsound as it has not been positively prepared, is not adequately justified, will not be effective, and is not consistent with national policy as expressed in the National Planning Policy Framework (March 2012, the version relevant to the NSP) nor with several London Plan policies, with regard to accommodating the future economic and civic life of the borough.

8.

Our representations point out the failure of the NSP as a whole to plan for the needs of the area's economy, and focus on key policies in the 'Strong, local economy' chapter, followed by a few policies of relevance to the economy in the rest of the plan.

9.

In our representations we have included some key extracts and summaries of NPPF paragraphs and London Plan (December 2017 Draft for Public Consultation) policies and supporting text, of particular relevance to each objection, but we emphasise that our representations on individual policies and site allocations couple to a challenging of the soundness of the plan as a whole, pointing out that there has been a failure to understand and then provide for the accommodation needs of all aspects of the borough's ongoing (and growing) economic and civic life. This failure straddles across the topic areas and policies on which we have made representations (Feb 2018 and today). The failure appears to have resulted from deficiency in the gathering of up to date and detailed information, an inadequate understanding of trends, and a lack of quantification of needs and consequences. During preparation of the plan there has not been consideration of non-residential capacity in a holistic manner, and there seems to have been a blindness to the need to balance the pressing requirement for substantial increases in housing supply with the equally valid claims by other activities for fair treatment and support for their spatial needs, through the planning system.

Representation regarding failure of the NSP as a whole to plan for the needs of the economy

10.

During preparation of the NSP there has been a failure to achieve an overall understanding of, a failure to audit and to map, the economic life of the borough and its current accommodation extent and geography, and following that a failure to marry what there currently is (accommodation and the economic life that uses that accommodation) with predicted future requirements. There appears to have been no coherent attempt to match requirements with provision through careful policy and policy map designations. Nowhere in the evidence base have we found schedules and map assessments of accommodation quantum, with estimations of the effect of policies, plan designations and allocations, compared with estimates of future need.

11.

This is a fundamental failure, a disregard of the most basic obligation to plan, and a matter of great concern because of the likely cumulative effect, in a time of unprecedented pressure for residential growth in London, of the NSP PSV (with revisions). The economy and civic life of Southwark has the potential to expand substantially, yet the NSP as it stands would allow, and in part actively promote, shrinkage of the accommodation relevant to a substantial proportion of that economy. Hence we suggest a substantial number of revisions, as are required to address these fundamental shortcomings

12.

Our alarm is greatest when we consider the cumulative effect, in a time of unprecedented pressure for residential growth in London, of the NSP as proposed for submission. The economy and civic life of Southwark has the potential to expand substantially, yet the NSP as it stands would allow, and in part actively promote, shrinkage of the accommodation for that economy. The strip-out of capacity could be most dramatic from high street places and industrial areas.

13.

The NSP has failed to demonstrate an understanding of, and an allowance for, the borough's full spatial needs for non-residential use, the latter due to a combination of inadequate protective policy and map designations, and active encouragement to develop counter to those needs.

14.

Our own crude review suggests that the scope of non-residential accommodation required far exceeds what this proposed plan allows for, allocates and protects. Most of our objections are regarding components of the overall picture of accommodation supply for non-residential uses that the plan has failed to ensure will be adequate.

15.

We object to failure to objectively assess and define the business and other development needs of Southwark, and failure to ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

16.

We note, for example, that the Southwark High Street Survey 2015 concentrated on frontage retail, only considered 8 high streets within the confines of town centre boundaries, and the survey of people focused on shopping rather than the full range of activities, so the exercise was far from comprehensive. Likewise the only other broad review of high street settings was the Southwark Retail Study which concentrated on A class uses and commercial leisure, and only considered 14 designated town centres, thus ignoring around half of the borough's high streets.

17.

In a similar spirit the Southwark Industrial and Warehousing Land Study only took note of sites identified and recommended for protection as industrial land by the 2010 Employment Land Study, being the SPIL and LSIS, ignoring industrial and hybrid B class space, and indeed office / studio accommodation, in numerous non designated industrial sites, in high street settings and elsewhere scattered in predominantly residential areas. Most recently the Southwark Employment Land Review focused only on B class uses, disregarding a vast array of other employment

generating uses, and it only considered the employment cluster areas highlighted in a 2009 study by URS, and relied on cursory reviews of areas, predominantly desk based, rather than systematic surveys. Thus the evidence base is woefully incomplete, sketchy and fractured.

18.
We point out that the Old Kent Road Workspace Demand study revealed current and projected demand for industrial accommodation in the Old Kent Road area such as to indicate the need for at least as much accommodation as currently exists to be part of the plans for the future. This validates the Mayor of London's policy requirement for no net loss of industrial accommodation from the Old Kent Road area, while exposing the inadequacy of the current draft of the OKR AAP and the NSP PSV (with amendments) with which it aligns, that would allow (indeed promote) a dramatic reduction of industrial accommodation. The OKR Workspace Demand Study adds to the strong evidence that reveals the unsoundness of the proposed NSP.

19.
We observe that Southwark industrial land release already exceeds London Plan benchmarks for up to 2031 by over 19 ha. Proposed approvals awaiting the Mayor's decision would push that to exceeding by 23 ha. If all live permissions were approved then the figure rises to 24.6 ha beyond the benchmark (total release since 2011 would get to 49.61 ha, around **twice the current benchmark for release up to 2031**).

20.
Thus we object to the failure to comprehensively designate all but the most modest identifiable industrial land in the borough as either SPIL or LSIS, or to include in site allocations (with clear policy on requirements to retain and / or replace capacity), or to define strong protective policies, as would be a logical response to the severe shortage of industrial accommodation in the Borough, and the GLA assessments and policy that emphasise and respond to that fact.

21.
We object to failure to meet the business and other development needs of Southwark. This failure is substantial and is likely to cause extensive damage to the existing economy and to constrict growth.

22.
There appears to have been no attempt to assess current and future accommodation needs in a systematic and holistic way, there is no indication that evidence from work such as that undertaken by the GLA on industrial accommodation demand and supply, and on high streets, has been coherently considered alongside work carried out for Southwark, in order to achieve such an assessment, and no evidence has been offered of a proper mapping and quantum assessment to understand the scale of accommodation need in relation to what currently exists, nor to check against the potential consequences of the policies, map designations and allocations set out in the NSP. It is particularly troubling that many of the recommendations made in reports that are within the evidence base have been ignored without explanation, resulting in a dramatic increase in the loss of capacity for economic and civic activity that the NSP would allow.

23.
We object to failure to ensure that the assessment of, and strategies for housing, employment and other uses are integrated, and failure to take full account of relevant market and economic signals. There has been a failure also to achieve a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

24.
We object to failure to be aspirational but realistic, and to pay careful attention to viability and costs in plan-making and decision-taking, and define a plan that is deliverable.

25.
There is no sign in the evidence base of any testing of viability of the huge quantity of development expected to include a mix of B class accommodation, office, hybrid business space, and industrial, with residential. This lack raises substantial deliverability concerns as the development types relied upon are relatively untested, indeed significant examples of them have to date not been delivered in Southwark.

26.
We object to failure to carry out early and meaningful engagement and collaboration with (amongst others) businesses during NSP preparation so that, as far as possible, the plan reflects a collective vision and a set of agreed priorities for the sustainable development of the area. Engagement with enterprise has been minimal such that it is not possible to claim that the NSP reflects a collective vision.

27.
We do not consider the plan to be sound because there has been a failure to effectively cooperate with neighbouring authorities to plan for issues with cross-boundary impacts, working together to meet development requirements which cannot wholly be met within Southwark, for instance because of a lack of physical capacity. There is no clear evidence of cooperation with other authorities to consider how to meet the accommodation needs of economic and civic activity, how to ensure that across the sub-region there will be sufficient quantum of accommodation, appropriately located and of suitable type.

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Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination

Appendix VOKR11

Referenced in Vital OKR Statements The Spatial Strategy and Area Visions

Regarding substantial inaccuracies in the Southwark industrial land baseline map as produced for the GLA's 2015 London Industrial Land Supply & Economy Study.

Assessment of an example area of Southwark

Prepared by Mark Brearley with the support of the Cities research unit at London Metropolitan University, on behalf of Vital OKR, January 2021.

The London-wide industrial land baseline mapping is the reference point for all the GLA's London-wide and borough-by-borough reviews of industrial land supply, and the baseline against which guidelines for the maximum acceptable loss of industrial land are measure.

The 2016 London Plan includes policy benchmarks (recommended maximums) for industrial land release, to be measured against the baseline mapping figures per borough.

The GLA's 2017 London Industrial Land Demand document set out further, tighter, benchmarks for industrial land release, these also to be measured against the baseline mapping figure.

Hence their accuracy of the baseline mapping of industrial land is crucial to strategic planning in London.

The baseline mapping is reviewed roughly every 5 years.

The most recent review and London-wide mapping was carried out in 2014, with conclusions incorporated in the GLA's 2015 London Industrial Land Supply & Economy Study.

In 2019 when Vital OKR and the Cities research unit at London Metropolitan University began collaborating, along with others, to produce a Southwark-wide audit of the industrial economy and its accommodation, the baseline maps were obtained from the GLA.

When viewing the maps it was immediately clear that there were substantial inaccuracies, with many areas that we knew had not been industrial in 2014 shown as industrial, and the reverse, areas that were industrial in 2014 (many of which still are industrial) not shown as industrial.

The most dramatic error we observed was the failure to map any of the borough's industrial use railway viaduct accommodation (a high proportion of the approx. 800 arches across the borough) as industrial.

We noted that Appendix A of the London Industrial Land Supply & Economy Study of 2015 describes a process of issuing draft updated land use and policy position maps to boroughs, for them to verify that the updated position was correct to the best of their knowledge and advise of any corrections or forthcoming changes. As the extensive errors we observed are of a type that could easily have been spotted with a simple check by someone with borough level knowledge we concluded that perhaps no checking of the Southwark maps took place.

To try to better understand what went wrong we asked to see information, including relevant correspondence.

The GLA responded as follows:

"Engagement with Boroughs to verify the maps produced following the finalisation of the desk-based review of land use, as described in the Industrial Land Supply & Economy Study 2015 Appendices (Appendix A: Approach), was directly undertaken by the appointed consultants. Accordingly, the GLA does not retain any record of the relevant correspondence with Southwark (or any other Borough) regarding this verification process."

We therefore made an information request to Southwark, for details of the baseline map verification process and relevant correspondence.

The cursory response we received simply stated the following:

"We have no correspondence on the 2015 study."

Hence it seems that there is no record of the verification process during creation of the substantially inaccurate 2014 industrial land baseline map of Southwark, and it seems that LBS have not taken seriously the need to have an accurate base map for the purpose of assessing changes and definition of policy.

In collaboration with the Cities research unit at London Metropolitan University (and others) I am currently finalising work carried out during 2019 and since to audit and assess Southwark's industrial economy and its accommodation.

That work, that will include a corrected 2014 industrial land baseline map, is likely to be ready for publication during March 2021.

In advance of the completion and publication of that Southwark-wide work, an assessment of 2014 industrial land baseline map inaccuracies across an 80 ha example area in the north-west of the borough has been prepared, so as to illustrate the problem.

As follows:

Here is the 80 ha example area with the GLA baseline mapping of industrial land in 2014 shown coloured pink, total 4.94 ha of industrial:

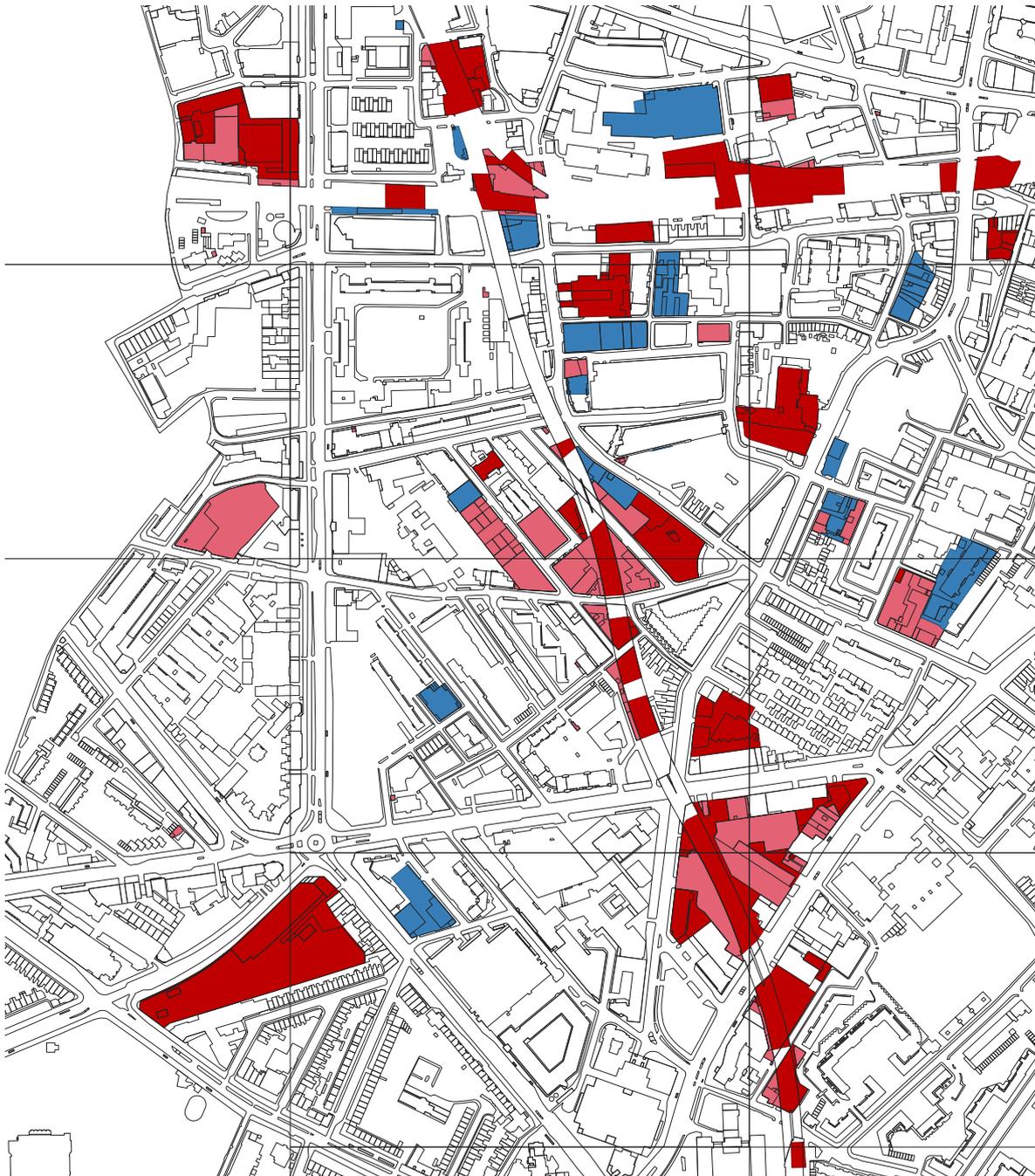


Here are shown the following, differentiated:

Pink: Areas correctly shown on GLA baseline map as industrial in 2014.

Blue: Areas that were included on the GLA map in error, that were in fact not industrial in 2014, an over-inclusion of 2 ha.

Red: Areas that were omitted from the GLA map in error, that were in fact industrial in 2014, an under inclusion of 5.84 ha.



Here is the corrected baseline mapping of industrial land in 2014, shown coloured red, total 8.77 ha across the example area.

We do not yet know whether, across the whole of Southwark, the GLA baseline map under-totalled or over-totalled industrial land.



While preparing this we also put together the following map showing the loss of industrial land since 2014 from this same 80 ha example area, Losses are coloured green, remaining industrial is coloured red:



Here is the corrected map of current (end 2020) land in industrial use in the example area, with NSP SV site allocations outlined blue.

In that example area 6 of the 15 site allocations promote redevelopment of industrial land (3.03 ha), with no requirement in policy requiring industrial accommodation reversion.

Across the current industrial areas that are outside of NSP SV site allocation there is also no policy requiring industrial accommodation reversion.



End

Appendix VOKR3

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Industrial land in Southwark

A review of the situation at end December 2020 and potential consequences of the NSP.

Prepared by Mark Brearley January 2021, based on a review of planning cases, and emerging findings from an audit of Southwark's industrial economy and accommodation carried out by the Cities research unit at London Metropolitan University in collaboration with Vital OKR (incorporating information from the OKR economy audit shared by LBS), and with reference to the NSP SV and draft OKR AAP.

Clarification of the end 2014 situation

In the London Industrial Land Supply & Economy Study, 2015 it is recorded that actual industrial land release at end 2014 in Southwark since 2011 had been 11.1 ha against the 25 ha benchmark release for the period 2011-31. In order to allow assessment the remaining industrial land at end 2014 can be assumed to be as shown on the baseline maps produced for the London Industrial Land Supply & Economy Study, 2015 (disregarding, for the purpose of assessment, the evidence of substantial errors in that baseline mapping)

In addition the 2015 study noted pipeline release in Southwark as 5.4 ha via the development pipeline (as recorded in LDD) and 0.1 ha via Housing Zone sites.

The following are the LDD development pipeline sites that the GLA noted:

Marshall House, 6 Pages Walk, approved Dec 2012	0.54 ha
Tower Bridge Business Complex (Biscuit Factory), approved Oct 2013, ongoing:	3.36 ha
81-83 County Street, approved Sep 2013:	0.05 ha
8-24 Sylvan Grove, approved Feb 2014:	0.33 ha
175-179 Long Lane, approved Nov 2014:	0.34 ha
100 Clements Road, approved July 2014:	0.30 ha
Surrey Docks Stadium and depot adjoining, approved Aug 2014:	0.48 ha
Total:	5.40 ha

The Housing Zone site noted is New Bermondsey Housing Zone, specifically a portion of a site on Bolina Road which falls within Southwark boundaries: 0.10 ha

Hence the total actual + pipeline release in Southwark at end 2014 was stated as 16.6 ha, against the policy benchmark release of 25 ha for the period ending 2031 (as GLA Land for Industry & Transport SPG).

However, at end 2014 there were 7 further LDD development pipeline sites not noted by the GLA (in error), hence not recorded in the London Industrial Land Supply & Economy Study, 2015.

Those sites are as follows:

2-10 Steedman St, approved Mar 2012, completed Mar 2016:	0.21 ha
Quebec Way Industrial Estate, approved Mar 2012, completed Aug 2018:	2.2 ha
1-6 Camberwell Green / 317-311 C' New Rd, approved Oct 2013, completed Mar 2017:	0.33 ha
399 Rotherhithe New Road / Verney, approved Jun 2014, completed Jul 2018:	0.95 ha
Chatelain House 182 Walworth Rd, approved Dec 2015, at end 2020 still built. Site 0.33	0.07 ha (industrial part of site)
Mulberry Business Park, approved Sep 2014, completed Mar 2017:	1.30 ha (officer report 1.48 ha)
3-5 Valentine Place / 27 Webber, approved Sep 2014, completed Oct 2014:	0.42 ha
Total:	5.48 ha

At end 2014 there was also pipeline release from then unimplemented permissions not recorded in LDD (too small or missed out from LDD in error), hence not recorded in London Industrial Land Supply & Economy Study, 2015. As follows:

16a Wyndham Rd / 166 etc Camberwell Rd, appvd May 2014, on site 2015 onwards. Site 0.23 ha: 0.15 ha (industrial part of site)

65 Lugard Rd (ex Roberts & Denny's), appvd Dec 2013, now completed:	0.16 ha
40 Rushworth St, appvd May 2014 (varying 2008 permission), now completed:	0.07 ha figure as officer report
21 Webber St, approved Jan 2014, May 2015 was on site, now completed:	0.34 ha
10-20 Steedman St, approved Mar 2012, Apr 2015 was on site, now completed:	0.05 ha
237 Walworth Rd, approved Dec 2014, now completed:	0.28 ha
36-38 Penrose St, approved 2010, now completed:	0.28 ha
57-59 Blue Anchor Lane, approved Feb 2014, now completed:	0.02 ha
Newspaper House (ex Martin Lavell), King's Bench St, approved Oct 2008, now completed:	0.03 ha
172-174 Queen's Rd, approved Jan 2010, not yet built:	0.04 ha
294-304 St James's Rd permitted dev conversion, approved May 2014, now completed	0.16 ha
Total:	1.58 ha

Hence the revised calculation, of the correct the actual + pipeline release situation at end 2014:

At end 2014 the actual industrial land release in Southwark since 2011 had been 11.1 ha, and pipeline release was 10.88 ha via the LDD recorded development pipeline (GLA noted 5.40 ha, failed to note a further 5.48 ha), and 0.1 ha pipeline via a Housing Zone site, and pipeline release from then unimplemented smaller site permissions not recorded in LDD 1.58 ha.

Total actual + pipeline release in Southwark at end 2014 therefore was: **23.66ha**

(11.1 + 10.88 + 0.1 + 1.58)

against the policy benchmark maximum of 25 ha for the period ending 2031.

What's happened since end 2014 to end 2020.

I have carried out a review to assess further actual + pipeline release between end 2014 and end 2020.

As follows:

Further actual + pipeline release of industrial land since end 2014. Loss in hectares:

Canada Water OA AAP, 2015, former printing works and industrial site on Roberts Close only (hence excluding 3x approved / completed Quebec Way sites that are included in list below): 2.60 ha

Further industrial land release recorded in LDD, end 2014 to end 2020 (taken from March 2020 LDD update, being the most recent publicly available version at end 2020):

240+252 Camberwell Road (ex Scena), approved Mar 2015:	0.75 ha
Manor Place Depot, approved Mar 2016:	1.50 ha (industrial parts of site)
24-28 Rushworth St / 61 Weber St, approved Apr 2016:	0.10 ha (LDD figure 0.11 ha)
2-6 Occupation Rd (Andy Knight), appvd Apr 2016. Site 0.13 ha. Includes credible reprovion.	(nil loss)
Rich Industrial Estate, Dec 2016, on site. Self store in part of basement but full land loss:	1.92 ha (LDD figure 1.98 ha)
1 Bank End (Borough Yards), approved Mar 2017:	0.40 ha, (western industrial part only.
175-179 Long Lane, approved Aug 2017 (loss of B8 indicated):	0.35 ha
14-21 Rushworth St: approved Dec 2017:	0.16 ha (LDD figure 0.17)
67-71 Tanner Street, approved Jan 2018:	0.05 ha
49-65 Southampton Way, approved Apr 2018:	0.13 ha (new office part only)
18-19 Crimscot St, May 2018:	0.15 ha (LDD figure 0.01)
136-142 New Kent Road (Kwik Fit), approved July 2018:	0.19 ha (LDD 0.4, officer report 0.2)
180 Ilderton, approved Sep 2018. Nil credible reprovion:	0.18 ha (nett loss)
47-49 Tanner Street, approved Feb 2019:	0.11 ha
60a / 62 Hatcham / 134-140 Ilderton, approved Mar 2019:	0.18 ha
78-94 Ormside St, appvd Mar 2019. Site 0.09 ha (LDD 0.22 ha) Includes maybe credible reprov:	0.03 ha (nett loss)
Ruby Triangle, approved Jun 2019 (claims to include industrial, but not credible):	0.96 ha (SIL part only)
Dockley Road, approved Sep 2019. Site 0.36 ha. Includes 394 sqm of perhaps credible B8:	0.32 ha (nett loss)
Total further loss recorded in LDD:	7.48 ha

It has been confirmed by Southwark that they have not been comprehensively monitoring, nor mapping, industrial land change, regardless of the requirement of the GLA Land for Industry & Transport SPG policy SPG3 (vi). Instead they have relied only on LDD date, being an incomplete monitoring.

I have reviewed further industrial land release not recorded in LDD, mostly (but not all) small sites, between end 2014 to end 2020 as follow:

25-31 Penrose St, conversion to residential, approved Jan 2015	0.04 ha
96 Webber St, approved Feb 2015:	0.02 ha (industrial part only)
26 Aberdour St appvd Feb 2015	0.03 ha
2-4 Woods Rd (ex MR Scaffolding), approved Feb 2015:	0.42 ha (industrial part only)
2-2a Crystal Palace Rd (Tribeca Court), approved Feb 2015:	0.12 ha
Gilkes Place, Dulwich (workshop site), approved Oct 2015:	0.22 ha
Arch 26 Union St, approved Nov 2015:	0.01 ha

278-280 St James's Rd permitted dev conversion 2015 + 2016:	0.13 ha
24-28 Quebec Way, approved Mar 2016:	0.47 ha
4-7 Sudrey St, approved July 2016, completed:	0.03 ha
171-177 Ilderton Road, approved Aug 2016. Nil reprovion:	0.06 ha
Arches 52-53 Maltby Street, approved Oct 2016:	0.01 ha
77a Stanbury Rd (ex Dulwich Bldg Serv), approved Nov 2016:	0.09 ha
Land north of Hillingdon St / Pelier St, approved Nov 2016:	0.07 ha (part of site including rail arches)
344-349 Camberwell Station Rd, approved Dec 2016:	0.12 ha
40 Queen's Row (Harker's Studio), approved Dec 2016	0.03 ha
87 Newington Causeway, approved Mar 2017:	0.13 ha
213 Rye Lane (ex Lobo), approved Mar 2017:	0.06 ha (net loss)
41 Maltby St (ex Lassco), approved Mar 2017:	0.13 ha (industrial part of mixed-use bldg.)
Braganza St Workshop, approved Apr 2017:	0.34 ha
25-27 Gordon Rd (Harradines), approved Mar 2017:	0.08 ha
23 Corbetts Lane, approved May 2017:	0.01 ha
Mina Road (Albany Garage), approved May 2017:	0.07 ha
1 Varcoe Road, approved July 2017, completed 2020:	0.08 ha
190 Rye Lane, approved Aug 2017:	0.12 ha
637-636 Old Kent Road (ex Blackfen), approved Nov 2017:	0.11 ha
272 St James's Rd (ex DJW) permitted dev conversion, approved Nov 2017:	0.08 ha
43 Bellenden Rd, approved Dec 2017:	0.04 ha
4-10 Bombay St, approved Jan 2018:	0.09 ha (estimate as no plan found)
16-18 Gibbon Rd. (ex HATS depot), approved Mar 2018:	0.12 ha
Arches 34-36 Maltby Street, approved Apr 2018. Change of use to retail:	0.04 ha
39b Consort Road, approved Apr 2018:	0.14 ha
269-275 Rye Lane + 1a Philip Walk, approved Aug 2018:	0.07 ha
Nye's Wharf, cttee approval Sep 2018. Site 0.3 ha. Some maybe credible reprovion:	0.26 ha (nett loss)
5 Pellatt Rd (ex Royal Mail E Dulwich), approved Oct 2018:	0.05 ha
202 Grange Rd, approved Nov 2018:	0.04 ha
Arch 133 Station Passage, Approved Dec 2018	0.01 ha
313-349 Ilderton Rd (Floyds), cttee approval Dec 2018. 0.2 ha site, some credible reprovion:	0.10 ha (nett loss)
596-608 OKR (ex Civic Centre), approved Dec 2018. Nil reprovion (B1 is office).	0.12 ha
49-53 Glengall (ex PSG), cttee approval Jan 2019. Site 0.44 ha. Some maybe credible reprov'n:	0.28 ha (nett loss)
Land at Cantium Retail Pk, cttee appvd Mar 2019. Take as nil loss, though B&Q semi-industrial	nil
Arches 13-16 Dolben Street, approved Mar 2019:	0.12 ha
Malt St, cttee appvl June 2019. Nil credible reprovion even though claimed to be:	2.2 ha
2 Hatcham Rd (ex Tradewinds), appvd Jul 2019. Site 0.09 ha. Maybe credible reprov'n eqiv 0.03ha:	0.06 ha (nett loss)
Ruby St 685-696 OKR SE15 1JS. cttee approval Oct 2019. Nil credible reprovion:	0.15 ha
5-9 Rockingham Street, approved Sep 2019 (loss of x3 rail arches):	0.05 ha (arches and yard only)
3-7 Bombay St (ex Steel Solutions). Nil credible reprov'n (B1 appears to be office). Appvd Sep 2019:	0.04 ha
2 Heaton Road (ex Glass London), approved Oct 2019	0.02 ha
301-303 Ilderton (ex ambulance strn) cttee appvl Nov 2019, some credible reprov'n. site is 0.05 ha	0.04 ha (nett loss)
2 Varcoe Road (ex scaffolders) appvl Dec 2019. includes B1 but not credible industrial	0.12 ha
50 North Cross Road (ex Runcent Joinery), approved Dec 2019:	0.01 ha
11-13 Spa Road, cttee appvl 3 Mar 2020	0.18 ha
77-89 Alscot Road (off Spa Gardens), cttee approved Mar 2020	0.12 ha
221 New Kent Road, approved Jun 2020 (inc 1,354 sqm 'flexible B1' but not restricted to B1c).	0.16 ha
Eagle Wharf (ex Whitten Timber) 90-96 Peckham Hill St, cttee approved Jun 2020	0.38 ha
Bianca Warehouse, 43 Glengall Rd (LSE), approval 22 Dec 2020. Reprov'n not credible industrial:	0.39 ha
33-38 Rushworth St / 1-7 King Bench St, cttee approved Jul 2020	0.10 ha
Valmar industrial estate, Valmar Rd SE5 9NW, cttee approved 8 Sep 2020	0.60 ha
304 Lynton Rd (ex Cedars Assist). Kalmars state resln to appv Nov 2020 (not clear from Southwark)	0.07 ha
Arches 11-12 Dolben St, approved Nov 2020:	0.07 ha
Total further release not recorded in LDD:	9.32 ha

Total all further release (actual + pipeline, LDD and not LDD) from end 2014 to end 2020: **16.80 ha**

End 2020 release (loss) calculation as follows:

At end 2014 the actual + pipeline industrial land release in Southwark since 2011 was 23.66 ha.
Total further actual + pipeline release (additional sites) since end 2014 up to end 2020 is 16.79 ha.
Hence end 2020 release (since 2011, actual + pipeline) is 23.66 ha + 16.80 ha, total: **40.46 ha**
against the 2016 London Plan policy benchmark of 25 ha for the period ending 2031.

Hence the 2016 London Plan policy benchmark has already been exceeded by 15.45 ha.

London Industrial Land Demand, 2017, revised down the recommended release benchmark for Southwark to 21.5 ha for the period up to 2041.
That benchmark is already exceeded (current actual + pipeline release 2011 to end 2020) by: **18.95 ha.**

And it's still getting worse.

Other cttee approvals that are (as at end 2020) subject to Mayor of London decision and that if approved would result in industrial land loss:

6-12 Verney Rd, cttee appvl Jun 2019. Site 0.75 ha. Some reprovion claimed, but not credible:	0.60 ha
227-255 Ilderton (Leathams). Some credible reprov. cttee appvl Jun 2020. Site 0.39 ha.	0.16 ha
79-161 Ilderton (ex Joyners). Cttee appvd May 2020. Nil reprovion	0.6 ha
651-657 OKR (Carpetright). cttee appvd Jun 2020. Nil reprovion	0.27 ha (SIL part only)
747etc OKR / Devonshire Grove. Cttee appvl Jun 2020. Some reprov but not limited to B1c	1.13 ha.
Daisy Business Park, 19-35 Sylvan Grove, cttee appvl Oct 2020. Some B1 reprov. Site 0.29 ha	0.20 ha (part excluding reprov)
14-22 Ossory, cttee appvl Dec 2020. Reprov claimed industrial could be made credible.	Nil (giving reprov benefit of doubt)
Total:	2.96 ha

+ as at end 2020 live applications proposing further loss. Applications appear likely to be approved.
Losses if approved:

21-23 Parkhouse St, application Mar 2019. Nil credible reprovion (B1 is designed as office):	0.13 ha.
Burgess Business Park, Parkhouse St, refused at appeal but new application imminent.	1.59 ha
812 OKR (VW part warehouse), application May 2019:	0.33 ha
Wingfield Mews (ex Columbia Metals), application May 2019:	0.09 ha
19 Bush Road (McNamara depot), application Aug 2019, decision target Jan 2021:	0.20 ha
258 Old Kent Road / Madron St (ex car repair garages), application Jan 2020:	0.01 ha
29-31 Page's Walk, application Apr 2020:	0.07 ha
Credon House / Verney Road, application Dec 2020:	0.05 ha

Total live applications: 2.47 ha

Total potential further loss from current live applications, if approved: (2.96 + 2.47) 5.43 ha

End 2020 release (since 2011, actual + pipeline) is 23.66 ha + 16.80 ha, total: 40.46 ha
Plus potential further loss from current live applications, if approved, 5.43 ha: 45.89 ha

45.89 ha loss would exceed the London Industrial Land Demand 2017 recommend release benchmark for Southwark for the period up to 2041 (21.5 ha) by **24.39 ha**.

That 46 ha loss of industrial land (actual + pipeline) from Southwark since 2011 is a 30% reduction from the 199 ha total (as GLA's baseline figure for that date).

That's all without counting further extensive release proposed in NSP SV (industrial designation extent changes and site allocations), nor factoring in the consequences of lack of protection of non-designated sites that are not within site allocations.

The exceeding of GLA guidance on maximum acceptable loss of industrial land in Southwark up to 2014 by 24 ha (as of end 2020, current actual + pipeline loss) is before taking account of any further loss allowed / promoted by the NSP SV and draft OKR AAP.

If those plans, NSP and AAP, were adopted unchanged then they would permit, and in part promote, further shrinkage of industrial land to just 52 ha in total across Southwark.

If that happened then the shrinkage since 2001 would have been 147 ha, a 74% loss from the 199 ha total as at 2001.

Such a loss would exceed the GLA guidance on acceptable maximum loss between 2001 and 2041 by 81 ha, close to four times the loss assessed as acceptable, hence a reduction exceeding policy guidance by somewhat more than the area of Burgess Park.

And that scenario, grim though it is, is based on an optimistic assumption that no nett loss of accommodation could be achieved in the 19.6 ha of LSIS as proposed in NSP SV, where co-location of housing and industry would be allowed (indeed already is being allowed in contempt of the adopted development plan).

So far such optimistic assumptions do not look credible.

Significant nett losses of internal industrial floor area, and close to complete loss of yard space, will result from the 25 recently granted permission within currently designated industrial areas in the OKR AAP area, and the site allocation texts and corresponding masterplan guidance in the draft AAP (and the more detailed consultant produced masterplan work that informed the policy documents) all indicate reduction of industrial accommodation in those proposed LSIS areas, equating to the equivalent of further industrial land loss as well as severely limiting future intensification potential. All indicators suggest no nett loss of industrial accommodation from those areas is in no way realistic.

If a reasonable assumption is made that in fact LSIS evolution would in fact at least halve their industrial capacity, then it's fair to count them as only delivering the equivalent of 9.8 ha of industrial rather than 19.6 ha.

On that basis Southwark's effective industrial land extent could shrink even further to 42.2 ha.

If that happened then the shrinkage since 2001 would have been 157 ha, a 79% loss from the 199 ha industrial land area at that date.

Such a loss would exceed the GLA guidance on acceptable maximum loss up to 2041 by 91 ha, close to four times the loss assessed as acceptable, that's 127 times the area of the pitch at Wembley Stadium.

End.

Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination

Appendix VOKR7

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Celebratory publication 'Old Kent Road Manufactures', September 2018.

Old Kent Road Manufactures

A celebratory booklet
with photographs
by Carmel King,
featuring [Kaymet](#),
[London Stone Carving](#),
[Small Beer Brew Co](#),
[Studio Makecreate](#),
[Weber Industries](#),
and also mentioning
[100 other makers](#)
and menders who are
threatened with expulsion.

Produced for the Open House London weekend, 22-23 September 2018, when five Old Kent Road manufacturers opened their doors to the public.



Despiker & Co, Ormside Street. Photo by Carmel King.



1 Purpose Powder Coatings, Verney Road. Photo by Alex Marsh.
 2 Flux Metal, Hatcham Road. Photo by Alex Marsh.
 3 Kaymet, Coney Road. Photo by Carmel King.

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Here there are melt filtration machine manufacturers, hydraulic equipment refurbishers, knife makers and menders, the pipe lining people, garment sewers, metal polishers, platers and powder coaters, precision engineers, furniture makers, Diespeker producing terrazzo, James Glancy conjuring big festive decorations. 50 people at the mighty William Say & Co make tin cans, PSG cut shims, Kaymet send out 20,000 trays each year. Amongst the many construction related businesses in the area are six joinery and metal fabricators, two stone workshops, two mirror and glass places, eleven contractors workshops and depots. Vehicle repair and servicing, along with garaging and hire, employs about 900 people in forty businesses. In the Old Kent Road area there is a dairy, butchers and fishmongers, seven commercial caterers, two wholesale bakeries, two ice producers and four breweries. More than 300 people are employed by close to thirty businesses in the world of food and drink production, preparation and wholesale.

There is a thriving culture and event related production industry in the area, with big emphasis on supporting art and theatre, sustaining around 470 jobs in 24 businesses that include Studio Makecreate, Souvenir Scenic Studios, Setwo, Flux Metal, Weber Industries, Veevers Carter, Event Concept, Made Up, and lots of smaller enterprises making props, models and costumes. Near the Old Kent Road close to 400 people work in printing businesses such as Jigsaw Colour, Paragon Service Point, Print Set, Four Graphics, Fontain, Push, Kube Print, Screaming Colour, FE Burman, Benwells, Willow Graphics, The Stationery Office, Hexio, and garment printers Plain Bear and 3rd Rail. Art and artisan production is now fast growing, with carvers, leatherworkers, jewellers, potters, costume makers, painters, sculptors, upholsterers, art printmakers, Damien Hirst's art factory, and Patey making riding and ceremonial hats as they have since the 1950s.

Old Kent Road Manufactures

Stand in the giant Asda car park, just off the Old Kent Road, and nothing signals it, but in this part of London people make things. Hundreds work in factories, workshops and studios, hidden away, producing. Alongside that supermarket's giant expanse of tarmac, as it happens, is a small yard that takes you to the Kaymet tray and trolley factory. As 2017 arrived this modest stalwart of urban manufacturing began celebrating its 70th year, but as it did so **the sky was darkening**. Southwark Council were working up a new version of their plans for the area, advocating the sweep-aside of Kaymet and most other Old Kent Road industry. It was clear that the time had come to get going a celebration of the area's vibrant economy, make people more aware, in the hope that better understanding might persuade the local authority planners to think again, might help them to understand that it is better to nurture than to annihilate, that it is not alright to disregard and destroy.

And so, in the September of their anniversary year Kaymet welcomed the public into their factory during the Open House London weekend. Hundreds came and took a tour, had a coffee and a biscuit, heard about the plight of the area's industry, the threat to several thousand jobs, the dangers of a loss of economic diversity. Spurred on by this success, by people's warm response, more Old Kent Road manufacturers have this year joined in. Photographer Carmel King was invited to make a record of what goes on, what the businesses do. Five are opening their doors this time, encouraging all to see and to enjoy, while rallying support for their David versus Goliath struggle. This tabloid tells you a little about each of 2018's brave five, and it presents a selection of Carmel's wonderful documentary photographs. The five are a taster, a glimpse into an Old Kent Road making and mending scene that includes over 100 thriving businesses.



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1 Souvenir Scenic Studios, Verney Road. Photo from their website.
 2 Gingsa Dairy, Old Kent Road. Photo by Andrei Schutze.
 3 William Say & Co, Verney Road. Photo by Carmel King.

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1 3rd Rail, Verney Road. Photo from company's Instagram.
 2 Capital Chrome, Old Kent Road. Photo source unknown.
 3 Pray Hata, Idenon Road. Photo from company's Instagram.
 4 John Hinds Framing, Latona Road. Photo source unknown.
 5 Livesey Workshop, Bird in Bush Road. Photo from their Instagram.

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Southwark Council have said that all this activity is declining, but all we see on the ground is growth. The manufacturing economy is burgeoning, hungry for more space. Established businesses like William Say are expanding, Kaymet has doubled in three years, Weber have just taken on another unit, Glancy is overflowing, Souvenir bursting at the seams. Others want to come to the area and start-ups are keen to be near the Old Kent Road. A recent advert offering short-term space for makers and menders, in industrial buildings that the owner hopes to replace with a giant residential tower, had a remarkable response. In just a few days dozens expressed interest, including bicycle producers, shoe makers, brewers, metal fabricators, leatherworkers, display fitting assemblers, coffee roasters, furniture makers and up-cyclers, lens cutters, clock and watch repairers, scenery makers, fibrous plaster moulders, upholsterers, an events florist, jewellers.

The future for these London makers should be bright, but now they must make a case for space in their own city, must fight with a burly local authority and its developer friends. The people who are the Old Kent Road urge all who read this to swing behind their argument that this world of enterprise should be allowed to stay, should be encouraged to thrive where it wants to be, and to gather others who are keen to be part of a fresh and spontaneous blossoming of urban industry. Please shout out, that good cities have industry, that the expulsions must stop, the welcome should begin.

This document was put together by the Vital OKR business association in collaboration with Cass Cities (The Cass, London Metropolitan University). Photographs by Carmel King unless otherwise stated. Apologies to those photographers we could not trace. Curation and text by Mark Brearley (Kaymet and Vital OKR). Graphic design by Adam Chelstow. With thanks to: Vital OKR members and the people and businesses of the Old Kent Road area, Rory O'Leary and Open House London, Kaymet, London Stone Carving, Small Beer Brew Co, Studio Makecreate, Weiser Industries, Despeker & Co, William Say & Co, Joe Williams, Alasdair Firth, Ivana Milanovic. Special thanks to The Cass and Southwark Council for help with the cost of producing this booklet. Published September 2018.

**VITAL
OKR**
A VOICE FOR THE ECONOMY
OF THE OLD KENT ROAD

If you support what's argued here and would like a mixed economy to thrive in this part of London, then please visit the Vital OKR website: vitalokr.com and join the association, either as a business member (if you are a business in the area) or as a friend member.



William Say & Co, Verney Road. Photo by Carmel King.



Kaymet, Ossory Road. Photo by Carmel King

Kaymet 52 Ossory Road

Kaymet produce anodised aluminium trays, trolleys and electric table hotplates. Their products sell in over 200 shops, in about 40 countries, and are supplied to hotels, restaurants and cafes, plus a few yachts and aircraft. The business started in the basement of the Schreiber family radio shop at Elephant & Castle, evolving into Kaymet in 1947, by which time a move to Kennington Lane had been made. At the end of the 1950s the company built its own factory near the Old Kent Road, where it stayed until the 1990s. Four moves after losing that one, the company arrived at its current fine spot behind Asda, the sixth Kaymet Works. The company has more than tripled production since 2013 and currently employ around ten people who produce about 20,000 anodised aluminium trays per year, as well as lots of trolleys and a few hotplates. At Ossory Road the team cut on a chop saw, table saw and guillotine. They crop with a big Bentley power press and with fly presses, notch with a smaller power press, grain on a big graining machine, do some lathe work, bend tubes and extrusions, drill and counter-bore, punch holes and logos. In the polishing shop they finish and polish, then degrease. Anodising and powder coating are done elsewhere (nearly in the Hatcham industrial area, in Mitcham and in Crawley). The team assemble with some glue and lots of rivets, rivnuts, screws, nuts and bolts, then they clean, label, pack and dispatch.

The current Kaymet Works was originally the Printorama printing works, built in the 1950s and 60s on the site of the Albany Pumps factory that was destroyed on the third night of The Blitz in September 1940. It's a wonderful building including a big square shed with a tubular truss north-light roof hovering above a continuous glazed clear-storey. Kaymet, who are proud to have a history of supply to the Royal Family tracing back nearly 70 years, and are delighted to have recently been granted a Royal Warrant of Appointment, look forward to the Royal Arms going up on the factory, and hope that the lion and the unicorn might scare off planners and developers who seem to want rid of them and other industry in Southwark.





London Stone Carving 52 Ossory Road

London Stone Carving is a multi-award winning team of classically trained stone carvers with over four decades' combined experience working stone, proud to be described as Master Craftsmen. Their workshop is in a small 1960s industrial building alongside the Kaymet tray factory, with which London Stone Carving share a yard. They take on a complete range of architectural and sculptural stone work, with expert attention to material, form, detail and historical context, producing work of the highest grade. The team's deep, broad and specialist skill sets mean projects can be organised to maximise each member's input; responsibility for each aspect is delegated according to specific strengths and all work is scrutinised and approved by the entire team before being released from the workshop.

Intrinsic to the profession are not only strong understanding of stone masonry, architectural and art history, but aptitude in academic drawing, accurate draughtsmanship, clay modelling, ornamental styles, and anatomical study. The work demands patience, attention to detail and accuracy. Alongside sculpting skill the restoration carver must also possess a deep understanding and appreciation of architectural period style and ornamental forms. Capacity to accurately reproduce is as essential as the ability to re-design and re-interpret. Together these allow work to be produced expertly and sympathetically within the context of historic restoration and new build. The team employs both traditional techniques and modern methods to produce work efficiently and competitively while maintaining high standards. The group of qualified masons and architectural conservators have broad experience and qualifications. All studied 'Historic Stone Carving' at the City and Guilds of London Art School, a course with international recognition as one of the only remaining institutions offering the extensive training it takes to become a highly skilled stone sculptor and carver. Team members hold the qualification BSC in Conservation and BA in Fine Art Sculpture, and have also studied architectural stone-masonry and conservation at Weymouth College. These qualifications are critical in strengthening and broadening our unique team's field of expertise.





Small Beer Brew Co 70-72 Verney Road

The Small Beer Brew Co was established in 2017 and is the world's first dedicated solely to the production of Small Beer. Founders James Grundy and Felix James always considered themselves fans of great tasting beer. On the search for one that they could enjoy without being knocked for six, they were surprised to find the space between 0.5% and 2.8% ABV completely untapped. Combining modern know-how with classical brewing methods, they set out on a mission to reignite the lost tradition of small beer, historically a staple in British daily life.

The brewery is housed in a Belcon portal frame structure erected circa 1983, comprising an open warehouse of 5,000 sq ft and an adjacent office space. In recent years it housed a commercial laundry and a logistics company specialising in electronic components. A series of internal partition walls and mezzanine floor were designed by Garbers & James Architects and built in 2018, incorporating the brewery bar, offices and storage rooms. Production is combined with cultural and community events. Brewery Yoga takes place on Saturday mornings and the cultural calendar includes Small Beer Sessions live music evenings, theatre and installations by local artists. The team are passionate about reducing the brewery's impact on the environment through their green initiatives. Consumables from boxes to labels to business cards are 100% recycled and water usage is kept to a minimum in part due to the implementation of an unconventional 'dry floor policy'. All electrical power is sourced from wind, water and solar and the team is insistent on continually questioning and improving on current practise.





Studio Makecreate 16–28 Penarth Street

Studio Makecreate is a multidisciplinary design and fabrication studio who specialise in bespoke sculpture production, product development, and design and manufacture for events & retail. The business was started by designer Lucy Norman and sculptor Jonathan Batten, and it has been based on Penarth Street for three years. The workshop is packed with everything that might be needed to take on a wide range of varied projects, from floats for London Pride, to mechanical sculptures for the Lumiere Festival and restoration of the huge Wishing Clock in Cheltenham. The venture began almost by accident, when Lucy was asked if she could design and make a waffle iron that made waffles in the shape of Nike trainers, in just five days. Johnny was drafted in, and after a few sleepless nights, they got it done, and the business grew from there.

Royal College of Art graduate Lucy Norman is a product designer whose career has included designing and manufacturing everything from furniture to sustainable lighting, points of sale and jewellery. Prior to starting the business, she designed for companies such as John Lewis, Nike, B&Q, Argos and Agent Provocateur, and has exhibited her own jewellery and furniture extensively throughout the UK and Europe. Central St. Martins graduate Jonathan Batten is a commercial sculptor with a passion for materials and techniques. Prior to starting the business, he worked for many years crafting a huge range of 'things' such as hats for Lady Gaga, architectural models for Anish Kapoor, furniture for Amanda Lavete Architects, lighting for Westfield Shopping Centre and window displays for brands such as Carphone Warehouse, M&S and Cartier. The workshop is in a portion of the old Dualit toaster factory.



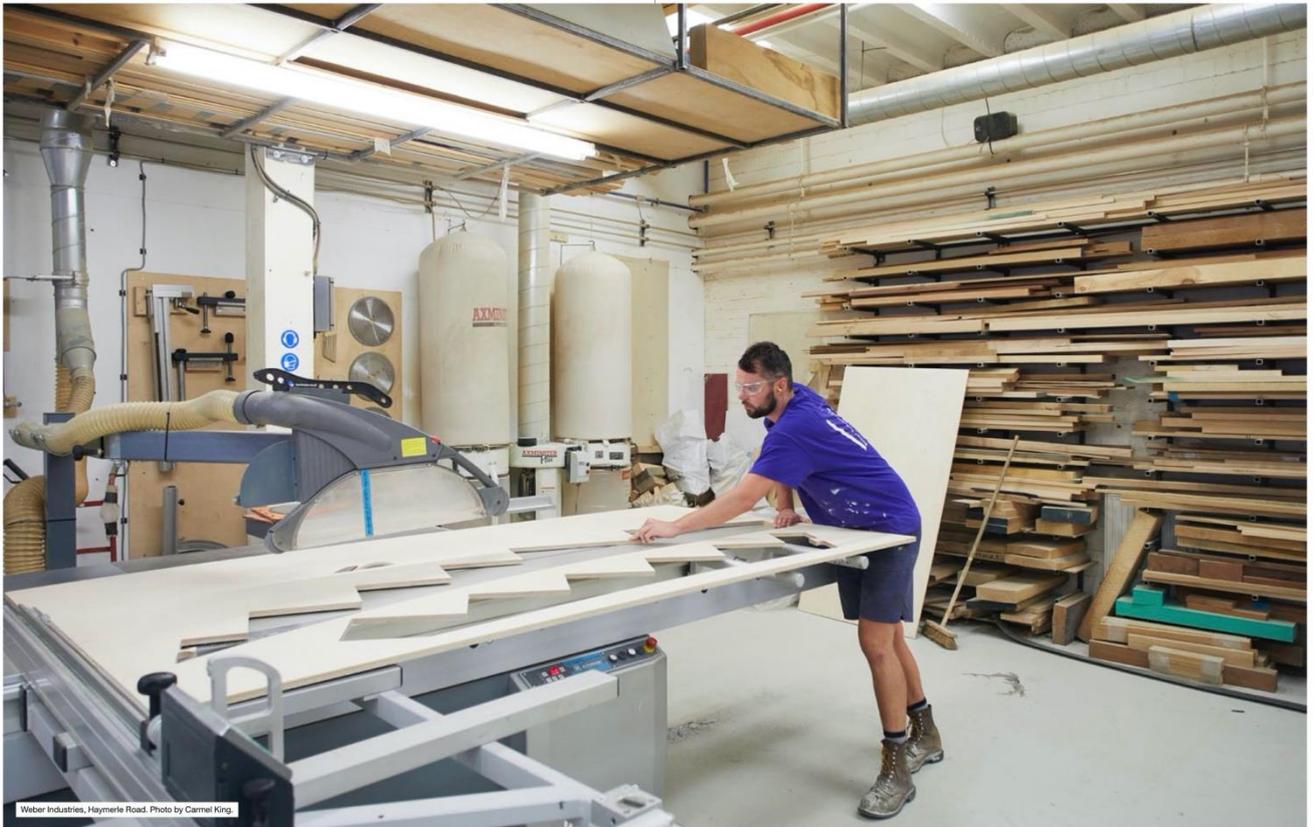
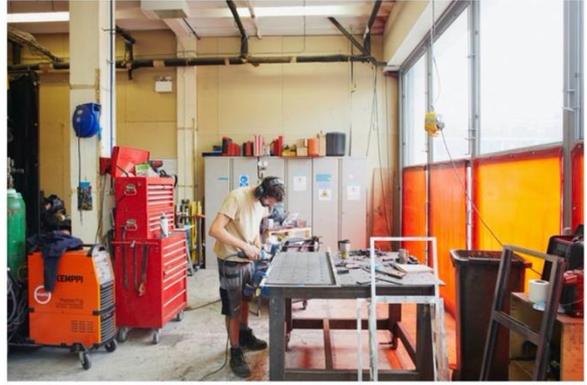


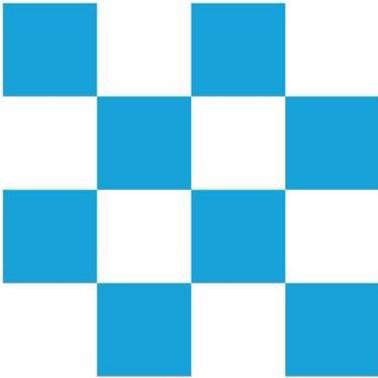
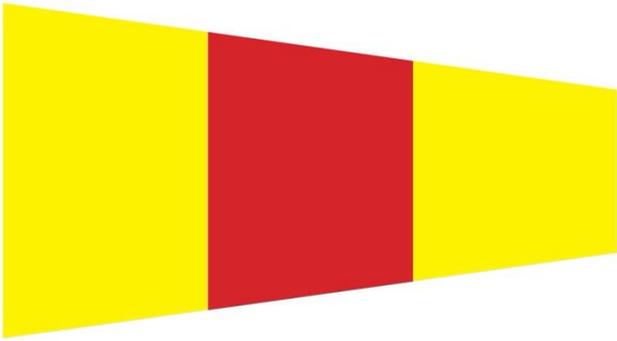
Weber Industries Studio 11G, 90 Haymerle Road

Weber Industries is a bespoke fabrication and design consultancy studio. They are able to develop projects from design conception through to production and installation. Weber's flexible workspace can facilitate projects using a wide variety of processes and materials ranging from wood and metal to Corian and Jesmonite, across all scales, from intricate objects to structural architectural features. An established network of partners enables delivery of technologically advanced solutions to production. All projects are completed in-house, providing a high degree of flexibility and control over every aspect of each project. Design services are offered, tailored to suit the needs of each client. The team can work from simple sketches, or develop initial concepts into CAD models and full architectural plans. Alongside bespoke fabrication and custom design the company offers project management and consultation services. Weber's approach integrates design with making, allowing elegant and efficient fabrication and installation methods to be developed for even the most complex or unusual projects.

The workshop is in a former pram factory that was refurbished in 2011 by Space to provide studios for artists and creative makers. Weber Industries has operated in the street-facing ground floor studios since 2012, and has been steadily expanding.







Firm put out the flags

The move may be the last for the Old Kent Road, Old Kent Rd. is to be widened by 40 ft, of the bricklayers arms conversion. One of the historic shops in London, John Edgington, known for tents, banners and flags, will disappear in the process.

In the true Trafalgar tradition, they are being a farewell signal to a flag-raising. An opening down, making way for the new. The widening of the road will eliminate the historic part of John Edgington's premises but they will continue to trade 40 ft further back.

South London Press, 3 November 1969.

In 1969, the long established marquee, banner and flag sellers John Edgington, just before being pushed aside by the Bricklayers Arms Flyover, displayed maritime signal flags reading: Am coming down. Making way for flyover. Inspired by this wonderful incident, the mighty chandler Alasdar Flint has helped us figure out the two flags needed to shout out: We are not nothing. We are not nothing: do not expel the people and economy of the Old Kent Road.

Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination
Appendix VOKR2

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Regarding builders merchants' premises in Southwark, May 2019 and end 2020.

Builders merchants' premises in Southwark

(Builders merchants including specialist building material (and salvage) wholesalers, and building equipment hirers, and hybrid wholesale / DIY).

The situation in May 2019, at end 2020, and as in NSP SV.

Prepared by Mark Brearley January 2021, based on emerging findings from an audit of Southwark's industrial economy and accommodation carried out by the Cities research unit at London Metropolitan University in collaboration with Vital OKR (incorporating information from the OKR economy audit shared by LBS).

There were 66 businesses / branches in this sector of Southwark industrial economy in May 2019.
The end 2020 situation + NSP SV is as follows:

7 have been displaced since May 2019 as a result of planning approval, or other displacement pressure (actual loss):

Floyds, Peckham (Ilderton Rd)	313-349 Ilderton approval displaced (moved to Eltham)
Whitten Timber, Peckham	Eagle Wharf approval displaced, no reprovion (business now folded)
Hireman, Old Kent Road	14-22 Ossory Rd approval displaced, no credible reprovion (moved to West Ham)
Glass London Limited, Peckham	2 Heaton Rd approval displaced (business now folded)
MKK Plumbing, Nunhead	Now replaced by Co-op supermarket
D+R Group Scaffolding, Varcoe Road	2 Varcoe Road approval displaced (activity relocated outside London)
Lassco, Bermondsey	41 Maltby Street approval displaced, no reprovion

5 are to be displaced as a result of a recent planning approvals, and an anticipated approval (immediate pipeline loss).

Travis Perkins, Old Kent Road	Approved Malt Street scheme will displace, no reprovion
B&Q, Old Kent Road	Approved Cantium Retail Park scheme will displace, no reprovion
Topps Tiles, Old Kent Road	Approved 596 etc OKR (ex Civic Centre) will displace, no suitable reprovion.
John MacNamara, Surrey Quays	19 Bush Road application threatens displacement, no reprovion
Brandon Hire Station, The Biscuit Factory	Approved Tower Bridge Business Complex scheme will displace

6 are protected as SIL in NSP SV.

Screwfix, Bermondsey	SIL in NSP SV
Toolstation, Bermondsey	SIL in NSP SV
BEW, Rotherhithe	SIL in NSP SV
CEF, Rotherhithe	SIL in NSP SV
Hi Lo Scaffolding, Ormside St	SIL in NSP SV
Dulux Decorating Centre, Rotherhithe New Rd	SIL in NSP SV

5 are vulnerable even though LSIS (in NSP SV) due to lack of reprovion requirement in general policy or site allocation text.

CBK Electrical, Ilderton Road	NSP67 threatens displacement (no required reprovion) LSIS in NSP SV
Rexel, Ossory Rd	NSP63 threatens displacement (no required reprovion) LSIS in NSP SV
SIG Insulation, Mandela Way	NSP55 threatens displacement (no required reprovion) LSIS in NSP SV
Jewson, Ilderton Road	NSP67 threatens displacement (no required reprovion) LSIS in NSP SV
Diespeker, Ormside Street	NSP67 threatens displacement (no required reprovion) LSIS in NSP SV

17 are vulnerable because in an NSP SV site allocation area with text not requiring reprovion.

Selco, Old Kent Road	NSP64 threatens displacement (no required reprovion)
Edmundson Electrical, Marlborough Grove	NSP64 threatens displacement (no required reprovion)
Gibbs & Dandy, East Dulwich	NSP36 threatens displacement (weak request for reprovion)
Eyre & Elliston, Old Kent Road	NSP65 threatens displacement (no required reprovion)
Toolstation, Old Kent Road	NSP 68 may threaten but recent residential above, some vulnerability
Wolseley, Page's Walk, Bermondsey	NSP54 threatens displacement (no required reprovion)
Wolseley, Marlborough Grove, OKR	NSP64 threatens displacement (no required reprovion)
Benchmark, Marlborough Grove	NSP64 threatens displacement (no required reprovion)

Jewson, East Dulwich	NSP38 threatens displacement (no required reprovion)
D+R Group Scaffolding, Peckham	NSP73 threatens displacement (no required reprovion)
Buildbase, Peckham	NSP72 threatens displacement (no required reprovion)
City Plumbing Supplies, Marlborough Grove	NSP64 threatens displacement (no required reprovion)
HSS Hire, Ruby Street off OKR	NSP65 threatens displacement (no required reprovion)
Belgravia Mirror & Glass, Devon St off OKR	NSP65 threatens displacement (no required reprovion)
Howdens, Goose Green Est, Dulwich	NSP40 threatens displacement (no required reprovion)
Howdens, Ruby Street off OKR	NSP65 threatens displacement (no required reprovion)
TLC Electrical, Marlborough Grove	NSP64 threatens displacement (no required reprovion)

26 are vulnerable due to NSP SV lack of designation or site allocation and no policy reprovion requirement, or due to vulnerability of high street frontage premises.

Alltype Roofing, Dulwich	High street frontage premises in strong demand location, vulnerable
Travis Perkins, Bankside	Non-designated industrial site, high value site, vulnerable
Tile Giant, Dulwich	High street frontage premises in weaker demand location, some vulnerability
Toolstation, Dulwich	High street frontage premises in weaker demand location, some vulnerability
Plough Homecraft, Dulwich	High street frontage premises in good demand location, vulnerable
Orion Trade Supplies, Peckham	Non-designated railway arch premises, vulnerable
Fix it Up DIY, Walworth	High street frontage premises in good demand location, vulnerable
Capital Glass & Mirror, Tower Bridge Road	High street frontage premises in good demand location, vulnerable
London Builders Merchants, Tower Bridge Road	High street frontage premises in good demand location, vulnerable
CA Baldwin, Camberwell	Non-designated industrial site, high value site, vulnerable
London Scaffolding, Peckham	Non-designated railway arch premises, vulnerable
Brewers, Peckham	Non-designated industrial site, vulnerable
Leyland SDM, Bankside	Frontage premises in high value mixed building, vulnerable
Sure Build Timber, Kirkwood Rd, Peckham	Non-designated industrial site, high value site, vulnerable
Premier Plant Hire, Herne Hill	Non-designated railway arch premises, vulnerable
Anford & Shane, Surrey Quays	High street frontage premises in weaker demand location, some vulnerability
Newold Scaffolding, Kinglake St, off OKR	Non-designated industrial site, high value site, vulnerable
Hilti Store, Great Suffolk Street	Non-designated industrial site / rail arch premises, high value site, vulnerable
Speedy Hire Centre, Great Suffolk Street	Non-designated industrial site / rail arch premises, high value site, vulnerable
Blue Mantle, Old Kent Road	High street frontage premises in good demand location, vulnerable
Arc Electrical, Old Kent Road	High street frontage premises in good demand location, vulnerable
Kenon Plumbers Merchants, OKR	High street frontage premises in good demand location, vulnerable
RJ Electrical Supplies, Herne Hill	High street frontage premises in good demand location, vulnerable
Bells, East Dulwich	High street frontage premises in strong demand location, vulnerable
Herne Hill Builder Centre, Herne Hill	High street frontage premises in good demand location, vulnerable
HSS Hire, Tower Bridge Road	High street frontage premises in good demand location, vulnerable

Summary:

66 businesses / branches in this sector of Southwark industrial economy at May 2019.

(Builders merchants including specialist building material (and salvage) wholesalers, and building equipment hirers, and hybrid wholesale / DIY).

The situation as at end 2020:

7 have been displaced since May 2019 as a result of planning approval, or other displacement pressure.

A further 5 are to go as a result of a recent planning approvals (and one anticipated approval).

Hence the actual and pipeline loss totals 12, a 18% shrinkage over less than 2 years.

Only 6 of the remaining 54 business premises are protected by NSP SV SIL designations, leaving 48 vulnerable to displacement, 89% of the total.

5 are vulnerable even though NSP SV LSIS designated, due to no reprovion requirement in general policy or site allocation text.

43 of the remaining 54 (that's 80%) are not NSP SV SIL or LSIS designated.

17 are vulnerable because non-designated industrial and within an allocated site for which the policy text does not require reprovion.

26 are vulnerable because non-designated industrial, not within and allocated site, and there is no general policy reprovion requirement.

End

Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination

Appendix VOKR6

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Regarding industrial rents in Southwark.

Observations on industrial rents in Southwark

Prepared by Mark Brearley January 2021, adding to a review first carried out in August 2019 for inclusion in MB's expert witness evidence for the Burgess Business Park planning appeal inquiry.

Southwark Council Industrial and Warehousing Land Study (GVA, 2014) cited 2013/14 Southwark average industrial rent of £7.40 sq ft

Southwark Employment Land Study Part 1 (CAG Jan 2016) cited 2016 Southwark average industrial rent of £10 sq ft

Old Kent Road Workspace Demand and Supply Study, powerpoint presentation (GVA, Sep 2018) cited 2018 OKR / Parkhouse area industrial rents of £14 sq ft.

My 19th Aug 2019 review of all the at that time marketed industrial premises showing on Novaloca in Southwark (16 in total) revealed average rent of £18 sq ft.

Of those 16 Southwark industrial premises then marketed as available 5 (around 30%) had quoting rents above £20 sq ft, with two (Ilderton Road and Verney Road) at £23 sq ft and one (Crimscott St) at £22.

My 26th January 2021 review of all the currently marketed industrial premises showing on Novaloca in Southwark (28 in total, of which only 20 quoting rents) revealed average rent of £20 sq ft.

Of those 20 Southwark industrial premises currently marketed as available and quoting 12 (around 60%) had quoting rents above £20 sq ft, with 4 quoting as high as £25 sq ft.

These reviews indicate roughly a 40% rise in quoting rents in just 16 months, and far above a tripling of rents over a 7 year period.

It is also significant that of the current 28 premises marketed, and evident on Novaloca, 8 (around 30%) are non quoting (rents are not advertised), that being a typical indicator of a local market where demand far exceeds supply.

GLA Industrial Land Demand and Release Benchmarks in London (Roger Tim & Partners, Dec 2011) cited typical prime industrial rent in the Central Services Circle (CSC) of up to £11 sq ft.

My review of currently marketed Southwark industrial premises revealed prime quoting rents of up to £25 sq ft, and an average quoting rent of £20, implying a doubling even from CSC prime industrial rents in a decade.

End

Appendix VOKR4

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Extract from London Plan Examination in Public: Panel Report October 2019.
Paragraphs 412-427 regarding industrial accommodation:

Are policies E4 to E7 and T7 justified and consistent with national policy, and would they provide an effective strategic framework for accommodating all types of industrial and related activities and the sustainable movement of freight?

412. A significant amount of industrial and related land in London has been redeveloped for other uses since the beginning of this century. There now remains around 7,000 hectares which are concentrated in central London and four other broad property market areas along main transport routes and river valleys (Thames Gateway, Lee Valley, Park Royal/Heathrow and Wandle Valley). This land is in a wide range of industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population. However, pressure continues for redevelopment of some industrial sites to higher value uses including residential.

413. Of the existing 7,000 hectares of industrial land, around 50% is designated as strategic industrial locations ("SIL", which is identified in Table 6.3 and on Figure 6.2); 14% as locally significant industrial sites ("LSIS"); and 36% is non-designated.

London Plan Examination in Public: Panel Report October 2019 Need for industrial land

414. The Mayor's evidence¹⁸¹ indicates that there will be a modest reduction in the amount of land needed for manufacturing over the plan period (-166 hectares), although there are indications that in recent years there has been a slight increase in demand. Storage and distribution uses are expected to require more land amounting to between 280 and 400 hectares depending on the assumptions made about plot ratios, a matter that we consider below. However, there have been significant changes in storage and distribution operations in recent years, including related to online shopping, and these trends are expected to continue. This, and significant population growth, could mean that more land, or sites in new locations, will be needed for B8 uses than is assumed in the Plan. Overall, the amount of land in other industrial and related uses is not expected to change significantly.

415. The Plan assumes an average plot ratio of 65% building footprint to 35% outside space based on analysis of a wide range of industrial sites¹⁸². However, there is a significant amount of evidence from boroughs and industrial site developers and occupiers of much lower plot ratios in some areas and for some uses, including storage and distribution. Whilst this does not mean that the average of 65% could not be achieved in the future, it does suggest that it may be challenging in some locations and for some types of development.

416. The Plan acknowledges that, of the existing 7,000 hectares, 185 hectares had planning permission in 2015 for non-industrial development, and a further 653 hectares had been identified by boroughs as having potential for redevelopment. Whilst some of these 838 hectares could ultimately be retained for industrial uses there is no certainty that this will transpire. The 2017 SHLAA indicates that the amount of designated and non-designated industrial land that had approval, was allocated, or had been identified as having potential for other uses had increased to 944 hectares¹⁸³. This suggests that more industrial land may actually be lost than assumed in the Plan based on the earlier industrial land studies.

417. The amount of vacant industrial land and premises in most boroughs is below 5%, which is a reasonable threshold to assume in an efficiently operating market. Some boroughs in east London have significantly higher vacancy rates, which if brought down to 5% would reduce the need for additional land by around 330 hectares. However, even if all of this vacant land were to be taken up, which is by no means certain as the reasons for it being unused are not clear, it would only go some way to replacing that which seems likely to be lost elsewhere.

418. All of the above indicates that there is likely to be a need, in quantitative terms, for more industrial land to meet future demand over the plan period to 2041 than assumed in the Plan. Whilst we cannot precisely quantify the requirement, it could be many hundreds of hectares based on the 2017 SHLAA and the uncertainties associated with the vacant industrial land in east

¹⁸¹ *Industrial Land Demand Study 2017* [EC/003] and *Industrial Land Supply Study 2016* [EC/006].

¹⁸² *London Employment Sites Database 2017* [EC/002a] section 3.3 and *Analysis of Plot Ratios in Industrial Development in London 2011-2018* [EC/032].

¹⁸³ SHLAA 2017 tables 5.22 and 5.23 [HOU/002].

London. Alternatively, the industrial land that does remain would have to be used much more intensively. However, even if that were so, whilst the existing industrial sites may be distributed across property markets and in locations that are generally suitable for the types of industrial use that are expected, there will almost certainly be a need to meet new locational and site specific requirements of some businesses including in and around the CAZ and other accessible locations.

Industrial land supply

419. The overall approach set out in the Plan is for the wide range of industrial development needs to be met on existing sites, including through the protection and more intensive use of SIL and LSIS; by reducing the amount of vacant land in the Thames Gateway; and by identifying six boroughs to provide additional capacity.

420. The Plan, rather than expressing policies in terms of hectares of land, does so by referring to floorspace and yard space. Whilst this is a new approach in London, it is an integral part of the way in which policies E4 to E7 are intended to operate to achieve no net loss of capacity within SIL and LSIS across London in overall terms. The Mayor's further suggested changes go some way to simplifying policies E4 to E7 which are collectively long and rather complex. In the context of the nature and role of the Plan as described earlier in this report, we are satisfied that the structure of policies E4 to E7 is acceptable.

421. However, in light of what we have concluded above about the need for industrial development over the Plan period, we consider that the approach to meeting those needs set out in E4 to E7 is aspirational but may not be realistic. This is for a number of reasons relating to the practicalities and viability of significant intensification of SIL and LSIS, the continuing pressure to redevelop non-designated sites for other uses, and the likely need for new sites in certain locations, including in and around the CAZ.

422. That said, much of the need is long term, and there are obviously significant uncertainties associated with predicting economic activity and associated land needs into the distant future. Achieving Good Growth will take considerable effort and changes in behaviour from all those involved in development. There is merit, therefore, in taking forward the overall approach set out in policies E4 to E7, subject to the following modifications which are required to ensure that the Plan is positively prepared in respect of meeting industrial development needs in the short to medium term.

423. Policy E4A should be strengthened to make it clear that a sufficient supply of industrial land and premises should be provided as well as maintained [PR28]. Furthermore, in finalising the Plan, further consideration should be given to the management of industrial floorspace capacity categorisations in Table 6.2 in order to provide a more positive strategic framework for the provision of industrial capacity [PR29]. We are unable to provide greater specificity about which particular boroughs' categorisations may need to be changed, due to the relationship with the SHLAA and housing targets and because of the apparent lack of non-Green Belt options for significant new locations for industrial development.

424. Moreover, the reasoned justification (paragraph 6.4.6) should be amended to refer to boroughs considering whether the Green Belt needs to be reviewed through their local plan process in order to provide additional capacity and/or new locations in the context of policy G2 [PR30]. This would ensure that the Plan is effective in allowing boroughs to identify a sufficient supply of land in different parts of London to meet current and future demands for industrial uses as required by policy E4.

425. We conclude elsewhere that the Plan be modified to include reference to a future strategic, London-wide Green Belt review. This should ensure that medium to longer term industrial needs can be met in sustainable locations if monitoring of this Plan indicates that policies E4 to E7 are not likely to be effective in achieving that aim. In order to provide clarity, the reasoned justification to policy E4 should be modified accordingly [PR31].

426. Policy E7D needs to be strengthened further to help protect non-designated industrial sites which currently make up over a third of all industrial land [PR32]. Whilst this is unlikely to be effective in preventing the redevelopment of most of the 900 hectares or so of land identified in the SHLAA, it is necessary to ensure the Plan is effective in protecting all viable industrial sites, including those occupied by small businesses, in the future.

427. Policy E7B refers to the possibility of the co-location of residential and social infrastructure alongside industrial uses on LSIS. Whilst this could make efficient use of land, it may be difficult to satisfactorily achieve in many areas and viability is likely to be an issue. However, the policy is not prescriptive, and such development is not expected to make a significant contribution towards meeting the Plan's housing targets. No further modifications are therefore required.

Freight, deliveries and servicing

428. The efficient movement of freight, and a shift to more sustainable modes, has economic, social and environmental benefits. The distance travelled by road freight in London has increased by around 40% in the last 25 years or so, and this trend is expected to continue. Policy T7 sets out a number of measures to reduce the need for, and impact of, freight trips and to coordinate the provision of infrastructure and facilities to manage freight in a sustainable way at a strategic level. The policy is expressed in terms of implementation through development plans and determining planning applications and deals appropriately with the spatial development aspects of the Mayor's *Transport Strategy and Freight and Servicing Action Plan 2019*¹⁸⁴. Policy T7 as a whole is consistent with and complements policies E4, SD1 and SD4M which aim to ensure a sufficient supply of land and premises to meet current and future demands for storage and distribution uses throughout London including in Opportunity Areas and the CAZ.

¹⁸⁴ TR/001 and TR/018.

429. Policy T7C requires development plans to safeguard railheads unless it can be demonstrated that they are no longer viable or capable of being made viable for rail-based freight-handling, and sets out a number of factors to consider in assessing viability. This provides a consistent approach towards strategic infrastructure that will be critical if the trend towards increased road freight is to be successfully

addressed. Whilst other topics are dealt with in greater detail in other parts of the Plan, this does not mean that the approach to rail freight is not sound.

430. The Mayor has suggested a number of further changes to policy T7 and reasoned justification. Subject to these, part E provides a positive approach to the development of consolidation and distribution facilities, which are expected to be needed, subject to a limited number of justified caveats. The addition of "where possible" to part E(5) rightfully acknowledges that some such facilities may be required even if they do not deliver mode shift from road to water or rail.

431. Part F has been amended to make it clear that the provision of on-street loading bays can be appropriate in certain circumstances if necessary off- street facilities for servicing, storage and deliveries cannot be incorporated into a development.

432. Further suggested changes to paragraph 10.7.6A make it clear that a variety of schemes can be used to help reduce road danger associated with construction works and to enable the use of safer vehicles. Subject to these changes, the policy is not unduly prescriptive as it allows for alternatives to the specific schemes referred to.

433. Finally, a further change suggested to paragraph 10.7.1 makes it clear that the policy seeks to facilitate sustainable freight movement by rail, river and road including through modal shift. For the reasons set out above, we are satisfied that the various parts of the policy should help to achieve this. However, so that the overall purpose of the policy is clear such that it will be effective, part A should set out that overall objective. Furthermore, to ensure consistency with policy SI15 and that the potential for canals to be used for moving freight is realised, "rivers" should be replaced with "waterways". We recommend accordingly [PR52].

Conclusion

434. Subject to our recommendations, policies E4 to E7 and T7 are justified and consistent with national policy, and they would provide an effective strategic framework for accommodating all types of industrial and related activities and the sustainable movement of freight.

End

Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination
Appendix VOKR14

Referenced in Vital OKR Statement on Matter 5

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

Email correspondence with GLA and LBS regarding the Ruby Triangle planning application, 2018 and 2019

From: "mark@kaymet.co.uk" <mark@kaymet.co.uk>
Subject: Re: Southwark planning application case reference 18/AP/0897, Ruby Triangle Site.
Date: 27 June 2019 at 08:12:57 BST
To: "lyndon.fothergill@london.gov.uk" <lyndon.fothergill@london.gov.uk>
Cc: "kate.randell@london.gov.uk" <kate.randell@london.gov.uk>, "john.finlayson@london.gov.uk" <john.finlayson@london.gov.uk>, Juliemma Mcloughlin <juliemma.mcloughlin@london.gov.uk>, Flora Walker <flora.walker@southwarklawcentre.org.uk>, Jonathan Welch <Jonathan.Welch@southwarklawcentre.org.uk>, Nicky Gavron <nicky.gavron@london.gov.uk>, Ed Bayes <Ed.Bayes@london.gov.uk>, "Tina Jadav (home)" <tjadav@hotmail.com>, Paul Harper <paul.harper@london.gov.uk>, Stu Wilkinson <swilkinson@pwcon.co.uk>, Janine Rowe <janinerowe@phonecoop.coop>, Luke Andrews <Luke.Andrews@const.co.uk>, Vital OKR business members Google group <vital-okr-business-members@googlegroups.com>, Jane Clossick <j.clossick@londonmet.ac.uk>

Hello Lyndon.

We heard last week that documents relating to the Ruby Triangle development proposal (Southwark case reference 18/AP/0897) has now been forwarded by Southwark to yourselves, and so the clock is ticking toward the deadline, this week I believe, for the Mayor's decision on the case.

I write, on behalf of Vital OKR, the 300 plus member association that speaks up for the economy of the Old Kent Road area, to urge that the recommendation to the Mayor be to instruct refusal of this scheme and to advise that if in future mixed development of the site is confirmed (following the statutory plan making process for the New Southwark Plan and OKR AAP) then a substantially revised scheme would be required in order to meet the Mayor's policies.

Approval of the current scheme would be a disaster for the economy of the Old Kent Road area. The reasons I highlight most strongly relate to the inadequacy of the non-residential accommodation (both quantity and type) that the scheme would itself provide, the setting of a precedent for accepting such inadequate industrial accommodation in lieu of good, and the entrenchment of some key aspects of a land-use scenario and masterplan for the area that is inappropriate, highly contested, and unsound in relation to policy, such that options on adjoining sites would be narrowed to the detriment of the area's economy. In short, we are afraid not just of the consequences of this scheme, if approved, but also of the domino effect that grant would cause, signalling a wider abandonment of policy and fairness, by the Mayor as well as by Southwark.

I draw your attention to my email to the Southwark Planning Committee dated 28th October 2018, and my email to Sarah Parsons at Southwark requesting that my email be treated as an objection (implying that hence it should be forward to the GLA). Those emails are copied in below. I also draw your attention to the letter that was submitted by the Southwark Law Centre on behalf of several local interested parties. That email is attached. I urge you to carefully consider all the points and the facts in that earlier correspondence.

In addition I point out the following:

1.

The Ruby Triangle case is the first major referable planning application to come to the Mayor for a Stage 2 decision since the the OKR AAP preparation process began. There are another 4 cases to be considered soon, all proposed for approval by Southwark. There are a further 4 major cases coming forward for Southwark's decision soon, each expected to be recommended for approval by Southwark planning officers. All these schemes second guess the outcome of the current plan preparation process by following the highly contested draft AAP while flagrantly violating adopted plan designations and emerging London Plan policy (most notably the requirement for no net loss of industrial from the OKR OA).

We argue it would be wrong in principle for any version of this mixed-use scheme to be approved in advance of conclusion of the statutory plan making process. If this scheme went through unchanged then it would undermine attempts to secure substantial revisions to the OKR AAP, a plan that is currently not compatible with the no net loss policy and that could not realistically achieve the substantial net increase in non-residential accommodation across the OKR area that is required. Approval of this scheme would entrench the clumsy masterplan scenario favoured by Southwark while invalidating currently realistic alternative options that have been suggested by consultees during a plan preparation period that is still far away from reaching the enquiry stage. Only recently have Southwark expressing willingness at last to discuss variant scenarios. Approval of the Ruby Triangle scheme would at a stroke invalidate such a discussion and would substantially reduce the chances of achieving (and delivering) a plan for the OKR area able to fairly balance the various strategic policy objectives.

Please be aware also that no coherent consultation of businesses in the area has taken place on this proposal nor on the masterplan content in the current draft of the AAP that this scheme follows. Meanwhile a meaningful business network, as promised by Southwark, does not exist, ongoing dialogue arrangements have not been established, and no noticeable steps are being taken by Southwark to assist businesses faced with accommodation uncertainty and expulsion.

Businesses in the OKR area hope that these facts will increase the Mayor's willingness to resist schemes, such as this current one for Ruby Triangle, that follow an overall land-use / development scenario for the OKR area, as outlined in the draft AAP, that is not able to meet all the key strategic objectives, and that has not been shaped "in a collaborative way with local communities and stakeholders" as the draft London Plan so hearteningly advocates.

2.

Approval of this scheme would set a precedent for acceptance of development in the OKR area that claims to provide industrial space, in order to tick a policy box, while in practice woefully failing to design in sufficient quantum of suitable industrial accommodation as required to meet well evidenced need and strongly justified policy.

The Southwark case officer's report claim that all of the B1 space in the Ruby Triangle scheme would be designed to accommodate B1c uses is absurd. Indicative of the misunderstanding of how fundamental are the design failings of the scheme in relation to industrial accommodation is that the officer describes design to suit B1c in the future tense ('would be designed') when in fact the key aspects of the scheme are already designed, and the application scheme includes B1 spaces that are self evidently unsuitable for light industrial use. To give a feel for the unsuitability of the B1 accommodation that's claimed to be suitable for light industrial use I here quote from an email sent to the case officer:

"I invite you to visit some normal light industrial spaces with me and to talk to people from the types of businesses that occupy them. We could act out some aspects of the Ruby Triangle scheme. Perhaps you would enjoy having a go at getting goods and equipment up and down a not very large staircase, and trying to get into a 1.8m deep lift with a loaded pallet truck and then pulling that pallet truck 130m along a public footway, then getting it through small pedestrian only size doors. We can have a look at a normal dust extract machine and you can show me on the drawings where an occupier could install it on the scheme, you can explain to me how it will all work if more than 3 lorries arrive on

Sandgate Street at one time as well as a refuse truck and a few vans, we can look at some everyday machines and racks and then you can explain how they could fit in spaces only 2.5m and 3.5m high, and you can share with me some suggestions for how to lay out a workshop in a space such as the triangular one, and many of the other quirky and complex ones. You can make some good suggestions about what to do with big waste bins, and have a go at trundling one of those 100m along the footway."

Even if the industrial accommodation in the scheme was suitable for light industrial use, the quantum is strikingly inadequate. The development as proposed for approval by Southwark includes only 5,328 sq m of B1, a net loss of about 56% from the current on site total of approx 12,182 sq m (within building and operational yards). Even compared with just the 8,317 sq m of within-building B class accommodation currently on site the loss would be 36%. If the Ruby Triangle scheme were to be approved this would escalate the industrial accommodation shortage in the OKR area.

We urge you to take into account the cumulative effect of the several schemes coming forward, each of which follows the draft OKR AAP regardless of its current weak status and failure to resolve key accommodation quantum challenges. Disregarding well justified strategic policy requiring no net loss of industrial, and evidence of strong demand (we understand that Southwark's own Workspace Demand Study concluded that net gain of industrial should be sought), permissions have to date been granted (or proposed for grant) for schemes that could result in total net loss of more than 800,000 sq ft of credible industrial space. That's close to a 90% loss compared with what currently exists across those sites. Southwark have claimed that the shortfall can be made-good with intensification elsewhere, but there is no evidence of this being realistic.

We have recently been advised by Southwark that an assessment is at last being carried out of current accommodation quantum per use type, and premises type, across the OKR area, and an assessment is also being carried out of the non-residential accommodation, per type, that might realistically be delivered if the current draft AAP (tweaked as described in Peter John's September 2018 letter to Jules Pipe) were followed. This, alongside imminent publication of the OKR Workspace Demand Study, is a huge step forward. We had e long been calling for it. But it is only when all this is on the table that proper consideration can be given to whether the draft AAP, and the cumulative outcome of development proposals following it, could meet needs and strategic policy.

It is our belief that assessment will show the draft AAP (and with it the relevant aspects of the NSP) to be unsound and a threat to the vibrant but vulnerable economy of the area. Our own review suggests that the land-use and development scenario currently favoured by Southwark would result in large scale net shrinkage of industrial accommodation in the OKR area, certain destruction of a substantial proportion of our current economy, and a stifling of much economic potential. We also observe that development schemes coming forward consistently make the same design errors as the Ruby Triangle scheme such that it is not realistic to accommodate other than the smallest and lightest of industrial uses, utterly failing to meet needs. Hence it would be a tragedy if the Mayor allowed the Ruby Triangle, the first to be considered by the Mayor, to go ahead.

3.

Without prejudice to our views on the inappropriateness of approving schemes such as this for Ruby Triangle in contempt of the adopted development plan, in advance of the conclusion of the AAP preparation process, we agree that a mixed use scenario is likely to be confirmed for this site (though less likely for nearby sites). A mixed use scheme coming forward once a new adopted plan is in place could be a variant of the current scheme. For such a proposal to have merit the lower floors and outdoor spaces could be boldly reconfigured while retaining the same general residential plan arrangement (most likely reappraised massing). We suggest that the priority given to the central public space over other uses could be reconsidered, particularly as Southwark are now proposing to build a substantial new public park on land they have purchased just 100m east of this site. We believe it would be better that public space in a Ruby Triangle development be designed as a network of working yards and small public gardens, rather than a somewhat inadequate and overshadowed park that lacks any dedicated sports or play provision. There could be bold redesign to achieve ground floor accommodation that has greater height and plan depth, is less compromised and has better goods access. There could also be an increase in the quantum and the quality of upper floor light industrial accommodation, with suitable goods lift access from an off-street yard (most likely between blocks A and B). We also suggest that the area indicated as a sports hall could more appropriately be industrial (benefitting from the same off-street yard), particularly as the sports hall was in part justified by relationship with a new secondary school the need for which is now being questioned, and the location for which is highly contested as it would compromise and be a threat to the industrial uses in the area. Our review suggests that it would be possible to achieve no net loss of suitable industrial accommodation, in a variant scheme, all designed in a way that can marry with residential and the proposed retail and hospitality uses.

Now is not the moment to explain in detail how a variant scheme that better meets policy objectives reflecting accommodation needs could be achieved, but it is clear from our assessment that this would be entirely possible even though it has not been properly pushed for by Southwark's planning officers. I emphasise that such a redesign is now only possible following refusal of the current scheme, for reasons including its failure to meet the policy requiring no net loss of industrial, the pitiful inadequacy of the industrial accommodation it does offer, and its compromising of adjoining industrial uses and areas. We urge that the Mayor be recommended to reject this proposal, without expectation that it will not go away entirely, but in order to open up discussion about substantial revisions that could allow successful incorporation of good industrial accommodation, and an increased quantum of such accommodation, alongside other improvements, ready for an application following full adoption of a new development plan..

4.

There has been inadequate consideration of the needs of existing businesses on site. Some have been evicted already, while others that remain are threatened with brush aside. Most substantial amongst the businesses on site currently is Constantine, the market-leading fine art logistics company who are based in the Sandgate St area, employer of 130 highly skilled people locally. Constantine have a 60 person strong part of their operation on the site in question. No one has bothered to properly talk with them, and their detailed letters to Southwark have been largely ignored. They came along to the Planning Committee meeting at which Southwark decided to propose approval, but the committee members did not even give them a chance to speak. In one of their several letters of objection they make clear that while they wish to co-operate with Southwark in its plans for urban renewal, they have so far been unable to find an alternative site in inner London, as is essential if the company is to retain its predominantly Southwark based employees. The company emphasises how crucial it is that they stay in the same part of London, and how key they are to the operation of several major galleries, most notably Tate Modern (who we understand sent a letter supporting Constantine's objection to the planning application). They ship major exhibitions, and also store art to a total value of several billion pounds (yes, that's billions!) They say they would be happy to go into a new building, that they could go on 4 floors, and if that happened they could fit what needs to stay in the area on a one acre site.

I emphasise that there has been no attempt to meet Constantine's entirely reasonable requirement to move all of their operation at once, not in bits, to only move once, and to be helped to relocate. As I understand it, no suitable inner London location has been found for Constantine to move to, and it is clear that it will be extremely difficult for them to find one without developer and / or public authority assistance. To ignore their needs flouts policies requiring protection or suitable re-provision of space used by creative industries (of which Constantine are rock-solidly a part) and requiring relocation of businesses to be resolved by the proposers of developments.

I attach here Constantine's letters of objection to the Ruby Triangle scheme, in case you have not been sent them all by Southwark.

As it stands now the scheme that will come before the Mayor requires Constantine's main office building (60 people), just over the road from their 3 specialist warehouses, to be destroyed, and Constantine to move in stages (which they regard as unacceptable), not clear to where, as well as ending up in the middle of a construction site for a significant period. The applicant's proposals for how to handle Constantine are unresolved and tokenistic.

We suggest that it would be appropriate to attach a Grampian condition to any scheme approval requiring displacement of Constantine from this site, such that the scheme can only proceed following the successful relocation of Constantine to suitable premises in an appropriate location. It is likely that provision of such premises could be achieved in the OKR area through collaboration between the proposers of the Ruby Triangle development and Southwark Council.

Good wishes.

Mark

Kaymet and Vital OKR



Destruction of the Old Kent Road is rolling, urged on by blundering Southwark Council, aided by yellow painted machines. Here's the last day of the wonderful 1920s garage building with spiral car ramp, where Ethnard Road meets the Old Kent Road. Local businesses Blacken Taxi and Classic Restorations were recently evicted from the building and have gone away. The neighbouring two Victorian shops are being needlessly demolished also. It's like the 1960s over again.

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From: "mark@kaymet.co.uk" <mark@kaymet.co.uk>
Subject: Regarding planning application 18/AP/0897 for the Ruby Triangle Site.
Date: 29 October 2018 at 00:08:36 GMT
To: "Parsons, Sarah" <Sarah.Parsons@southwark.gov.uk>
Cc: "Wilson, Colin" <colin.wilson@southwark.gov.uk>, "Cutts, Tim" <tim.cutts@southwark.gov.uk>, Laura Hills <Laura.Hills@southwark.gov.uk>, "Chauhan, Kiran" <Kiran.Chauhan@southwark.gov.uk>, Nick Wolff <Nick.Wolff@southwark.gov.uk>, Juliet Seymour <juliet.seymour@southwark.gov.uk>

Hello Sarah.

See below my email, about the Ruby Triangle case, sent to relevant Southwark councillors this evening.

I appreciate that this arrives with you only hours before consideration of the scheme at committee, but regardless I ask that this email be treated as an objection to the planning application, and recorded and displayed as such.

Good wishes.

Mark

Kaymet and Vital OKR



The Reality of Grace Ministries, 7 Ruby Triangle SE15, one of the churches threatened with expulsion by the giant Ruby Triangle development proposal that would reduce church space in the area between Sandgate Street and the Old Kent Road by around three quarters, allowing only one of the several churches to stay. 48 and 40 storey residential towers are proposed, but most of the civic life of the area would be expelled, as would the industrial economy that policy requires the developer to provide at least 130,000 sq ft of good accommodation for, but they are proposing to build none.

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From: "mark@kaymet.co.uk" <mark@kaymet.co.uk>
Subject: Regarding planning application 18/AP/0897 for the Ruby Triangle Site.
Date: 28 October 2018 at 23:58:41 GMT
To: Cllr Darren Merrill <Darren.Merrill@southwark.gov.uk>, Cllr Martin Seaton <martin.seaton@southwark.gov.uk>, "adele.morris@southwark.gov.uk" <adele.morris@southwark.gov.uk>, "hamish.mccallum@southwark.gov.uk" <hamish.mccallum@southwark.gov.uk>, "james.mccash@southwark.gov.uk" <james.mccash@southwark.gov.uk>, "james.mccash@southwark.gov.uk" <james.mccash@southwark.gov.uk>, "jason.ochere@southwark.gov.uk" <jason.ochere@southwark.gov.uk>, "jason.ochere@southwark.gov.uk" <jason.ochere@southwark.gov.uk>, "cleo.soanes@southwark.gov.uk" <cleo.soanes@southwark.gov.uk>, "kath.whittam@southwark.gov.uk" <kath.whittam@southwark.gov.uk>, "kath.whittam@southwark.gov.uk" <kath.whittam@southwark.gov.uk>, "james.coldwell@southwark.gov.uk" <james.coldwell@southwark.gov.uk>, "jane.salmon@southwark.gov.uk" <jane.salmon@southwark.gov.uk>, "jane.salmon@southwark.gov.uk" <jane.salmon@southwark.gov.uk>, "tom.flynn@southwark.gov.uk" <tom.flynn@southwark.gov.uk>, "tom.flynn@southwark.gov.uk" <tom.flynn@southwark.gov.uk>, "renata.hamvas@southwark.gov.uk" <renata.hamvas@southwark.gov.uk>, "damian.obrien@southwark.gov.uk" <damian.obrien@southwark.gov.uk>, "damian.obrien@southwark.gov.uk" <damian.obrien@southwark.gov.uk>, "sunny.lambe@southwark.gov.uk" <sunny.lambe@southwark.gov.uk>, "leo.pollak@southwark.gov.uk" <leo.pollak@southwark.gov.uk>, "leo.pollak@southwark.gov.uk" <leo.pollak@southwark.gov.uk>, Cllr Evelyn Akoto <evelyn.akoto@southwark.gov.uk>, Cllr Richard Livingstone <richard.livingstone@southwark.gov.uk>, Cllr Michael Situ <michael.situ@southwark.gov.uk>, "helen.dennis@southwark.gov.uk" <helen.dennis@southwark.gov.uk>, "karl.eastham@southwark.gov.uk" <karl.eastham@southwark.gov.uk>, Cllr Rebecca Lury <rebecca.lury@southwark.gov.uk>, Cllr Darren Merrill <Darren.Merrill@southwark.gov.uk>, Cllr Martin Seaton <martin.seaton@southwark.gov.uk>, "leanne.werner@southwark.gov.uk" <leanne.werner@southwark.gov.uk>, "humaira.ali@southwark.gov.uk" <humaira.ali@southwark.gov.uk>, Cllr William Hougbo <william.hougbo@southwark.gov.uk>, "cllrsirajul.islam@southwark.gov.uk" <cllrsirajul.islam@southwark.gov.uk>, Cllr Jack Buck <jack.buck@southwark.gov.uk>, "paul.fleming@southwark.gov.uk" <paul.fleming@southwark.gov.uk>, "lorraine.lauder@southwark.gov.uk" <lorraine.lauder@southwark.gov.uk>, Cllr Johnson Situ <johnson.situ@southwark.gov.uk>, Cllr Kieron Williams <kieron.williams@southwark.gov.uk>, Cllr Peter John <peter.john@southwark.gov.uk>
Cc: Vital OKR business members Google group <vital-okr-business-members@googlegroups.com>, Vital OKR friend members Google group <vital-okr-friend-members@googlegroups.com>, Flora Walker <flora.walker@southwarklawcentre.org.uk>, Jonathan Welch <jhrwelch@gmail.com>

VITAL OKR

A VOICE FOR THE ECONOMY
OF THE OLD KENT ROAD

Hello members of the Southwark Planning Committee (and other most relevant councillors, copied in).

Tomorrow evening you are considering the latest of a series of substantial planning applications for schemes in the OKR area that are in contempt of currently adopted plans, and that assume draft plans are a done deal even though they are far from that, indeed they are highly contested and themselves partially in violation of strategic policy.

I write on behalf of members of the Vital OKR businesses association to urge you to refuse the Ruby Triangle application. I here emphasise two reasons why you should refuse:

1.

You should refuse the application because it is inappropriate and unjust to disregard adopted plans, to reward people who submit planning applications with no regard for people's right to influence emerging plans, that may substantially affect their lives, and ultimately to have their concerns heard by an independent inspector. To approve proposals such as this one, that are dramatically at odds with the plan that's in place, strips away hard won rights and is thus an abuse of power. If you approve then you take us all back 50 years to the dark days of top down and destructive planning, before Skeffington (People and Planning: Report of the Committee on Public Participation in Planning). I hope you recognise that this is an ethical matter more than a procedural matter.

2.

You should refuse because, even if the scheme was aligned with an adopted plan, it is not a good scheme. It could be hugely improved, if further discussion and wider dialogue was allowed, if some hearing of advice could begin. But as it stands, it fails to achieve what it claims to achieve, it does not meet general policy on matters such as waste facilities, industrial accommodation, business floorspace, community uses, and proper regard has not been paid to the needs of existing occupiers of the buildings and yards on site.

I encourage you to study with care the letter you have received from Jonathan Welch of the Southwark Law Centre, that incorporates many of our objections to the scheme. Here is the letter again, in case it passed you by:

The greatest priority for Vital OKR members is ensuring the supply of sufficient and suitable business accommodation in the OKR area to meet the needs of our thriving economy. Please take note of the following observations on this matter:

A.

Draft London Plan policy (that now has considerable weight) requires that any development on this site (whether following the current or a future adopted plan, whether with or without housing) provide a quantum of suitable industrial accommodation equal or greater than what's currently on site. Meanwhile draft NSP policy requires developments (in locations including opportunity areas) to 'retain or increase the amount of employment floor space on-site'.

In disregard of these policies the scheme before you proposes 5,328 sq m of B1, a net loss of about 56% from the current total of approx 12,182 sq m (within building and operational yards). Even compared only with the within-building B class accommodation currently on site, 8,317 sq m, the loss is 36%.

Even in a development of the general type proposed, with a vast residential component, there is no good reason why full replacement of the current quantum of industrial accommodation could not be achieved. The problem is that the applicant has not tried hard enough, and we get the impression that the planning officers have not been pushing them to deliver in a way that can meet evident need.

B.

Draft London Plan policy requires that B class accommodation replacing industrial space be suitable for industrial use. The applicant and the Southwark case officer claim that the B class space has all been designed to suit industrial use, but this is clearly untrue. I urge you to consider the following about the scheme before you:

There is inadequate goods vehicle loading provision. It does not seem to allow for largest sized rigid lorries, nor articulated lorries. If a vehicle was in the space serving Block B (the main concentration of commercial units, all claimed to be good light industrial, in partial compensation for loss of existing, remember) then it is not clear where another lorry, or even a van could park to load. Routes (on footways and over kerbs) to get goods and equipment from vehicles to entrances are in many cases long and complex, entirely unsuitable for light industrial use. We have noted the following goods travel distances:

From nearest on-street loading bay to the one goods lift indicated (Block B) is approx 25m. If that bay was occupied then the alternatives are a further 60m or 115m away;

From nearest on-street loading bay to Block B ground floor B1 units is approx 20m, 30m, 65m and 90m.

From nearest on-street loading bay to Block C ground floor B1 units is approx 10m, 15m, 25m, 33m, 70m, 95m, 110m, 120m and 130m.

From nearest on-street loading bay to 639 - 641 OKR entrance is approx 80m.

I challenge any of you to pull a loaded pallet truck from the street and then along a public footway for 130m, and to do that frequently.

There is no provision for commercial bins and it seems that the occupiers of B1 units would be expected to ask their waste collection contractors to use those same 3 on-street loading bays, at distances ranging from 10m up to as much as 130m away from unit entrances, and no available bin stores, not even for the extensive upper floor units in Block B.

The case officer claims that all upper floor B1 accommodation is served by goods lifts, but this is not true. 70% of the B1 space is above ground floor, but of that 36% has no goods lift access.

In fact only one goods lift is shown, providing compromised access to the Block B 2nd floor commercial units and to 3 of the 4 first floor commercial units, in total 45% of the B class accommodation in the scheme. That single lift is accessed via a corridor area that looks like it would be tight for goods manoeuvring. Routes from lift to street and from lift to unit entrances include not very wide double doors, and no separation of goods doors and regular doors. The goods lift is only about 1.8m deep, which is much less than required to comfortably take a loaded manual pallet truck and operator (3m would be reasonable). There is no goods lift shown in 639 - 641 OKR, so no credible goods access to the upper 3 commercial floors in that building, that being the other chunk of upper floor commercial accommodation in the scheme. Substantial redesign would be required to make the goods access adequate. A reasonable provision could be 3x 3m deep goods lifts (x2 in block B, x1 in 639 - 641) with better resolved routes and door arrangements.

B class unit entrance door arrangements are clearly inadequate for goods access. The normal minimum for a light industrial unit is 3m x 3m. There are no doors of that size nor larger shown on the scheme drawings.

There is a complete lack of operational yard space provision in the scheme.

There are no clearly acceptable locations for air extracts and noise / emission generating equipment that require a relationship to outdoors, and likewise no obvious locations for blast relief panels and such modest risk elements. The problem is caused by the lack of defined backs to units. This would be a significant problem.

There is no disabled parking for workers, nor business visitor / customer parking.

Many of the B class units have compromised plan arrangements (overall configuration and column locations), including a triangular unit!

Many units have compromising ceiling heights (some appear to be as low as 2.5m, others 3m).

Most units have window arrangements that would compromise much light industrial use.

There are mentions of imposing restrictions on the timing of goods vehicle access such as would compromise industrial use flexibility.

All units are small, yet sites such as this should be providing some that are larger, as is appropriate to meet the range of needs in the area.

In summary then, to claim that the B class space proposed would be suitable for light industrial use, and can be counted as partial replacement for the industrial space that the site owner wishes to evict remaining tenants from and then demolish, is completely absurd. In fact no suitable light industrial space is offered. The reduction would be from 12,182 sq m to nil. A 100% loss, flouting strong policy requiring no net loss, and erasing enterprise and jobs.

C.

I remind you that at New London Architecture (The Building Centre at 26 Store Street, WC1E), on Friday 15th December 2017, when the AAP draft was launched for consultation, Southwark leader Cllr Peter John emphasised his desire to 'preserve and enhance what we've got', and then went on: 'I'd say to developers or their representatives rushing to kick businesses out stop, stop, stop! That is not the vision for Old Kent Road.'

Regardless of those fine words from Cllr Peter John, it is proposed only to write a requirement to come up with a strategy for relocation / re-provision for businesses into the S106 agreement for the scheme, thus delaying resolution of the matter until after the main leverage that the planning authority has (the option to refuse permission) has been lost (through grant of planning permission). The deferral would allow the applicant to choose when to come up with the strategy, and if they decided to remove the existing uses / occupants from the site and only after that prepare a strategy, then there would be nothing Southwark could do. The only sanction left would be to prevent the development from proceeding. The chances of Southwark refusing to allow a development to proceed because they don't like the strategy and feel that they have been tricked are minimal, particularly if all the uses / occupiers that were there have long gone and the site has been cleared and is already sprouting buddleia.

To defer relocation / re-provision matters until after grant of permission would make a mockery of the intent of the various policies on this, as well as those words of reassurance from the Leader of the Council. Largely ignoring the issue until after grant of permission, not getting correct information together about current and recent-past occupation, not gaining understanding of availability (or unavailability) of move-to space, not liaising direct with current occupiers nor helping to enable move-to space, and then not reporting accurately to committee, is in no way an adequate response to policy nor a suitable way to act following the assurances given by Cllr Peter John.

D.

I point out that, as the officer report reveals, the 'affordable' B1 space, that at some places the officer report claims is all 'industrial' and repeatedly claims meets all the specification requirements of B1(c), is in fact to be pitched at the top end of the current range of market rents for industrial / workshop space. To charge up to £24 per sq ft for what's claimed to be light industrial space but that has shockingly compromised goods access, no clear backs, no provision for refuse, no parking (not even for disabled workers), no yards, in many cases awkwardly / weirdly shaped spaces, much of it with low ceilings, possibly with glazing where most would not want glazing, is outrageous. If that's what the proposer of the developer intend to rent out the 'affordable' at then I don't dare to think what they hope to get for all the rest. It is crystal clear that they have designed the space for office / studio use, not for light industrial use, and they hope to get tenants who will pay hefty for that, seeing off any industrial that might dare to try for survive in the grotesquely inadequate alleged B1(c) space. If Southwark believe that it is worthwhile to insist on provision of affordable business space then it should insist that rents be significantly below market rates.

I urge you, on behalf of the thriving businesses in the OKR area, to reject this clumsy proposal, and censure the case officer for failing to provide correct facts. We also suggest that you should challenge the Southwark planning team to seek advice from those with expertise in what makes good light industrial accommodation, and with understanding of how the combination with residential can be made to work. This includes people from local businesses. It is clear that Southwark officers lack some key aspects of expertise. They should ask others, be more open to input.

Good wishes.

Mark

Kaymet and Vital OKR

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We were not invited!



Here are a couple of glimpses of the *masterplanning* workshops and landowner workshops that took place during the formative stage of the

Masterplan content (referred to also as a Local Development Study) relating to OKR13 (NSP67) that's included in the December 2017 draft OKR AAP.

The extensive process, supported by consultants about whose involvement the public were not informed, happened behind closed doors, with the participation of only a selected group of landowners, developers with their consultants, and Southwark officers. It has been stated by one of the consultants involved in the process that 8 landowners and their consultant teams participated, as did key stakeholders at Southwark Council and other architect teams working within the Old Kent Road opportunity area. But there seems to have been no attempt to engage with the other 23 OKR13 landowners, nor (with the exception of two owner-occupiers) with the approx 80 businesses operating in the OKR13 area, nor the 7 churches in the area at the time, nor the nursery school and health centre, nor the residents of Canal Grove, nor anyone living or working in surrounding areas, nor others with an interest, nor a wider public.

The *Masterplan* content that emerged from this process was transferred into the December 2017 draft of the AAP.

At no point in the process that expanded the draft AAP content on OKR13 from less than a single A4 page up to 16 A4 pages, and went from one loose land-use and development policy covering the entire area to highly prescriptive policies for 22 distinct development chunks, were there any public meetings. There were no meetings to which all landowners were invited, none for all businesses, and none for a wider public including residents and those who work in adjoining areas. Nor was any of the investigation work, including option testing, made public nor requests made for input.

Similar behind closed doors formative stage processes have been going on in other parts of the OKR area, with most potentially affected parties and the wider public offered no opportunity to participate. In fact, throughout the whole AAP preparation process to date there have not been any Southwark organised open invitation consultation meetings focused on any of the sub-areas.

This is all flagrantly in violation of the general principles of the public law duty to consult, the *Gunning Principles* (as affirmed by the Supreme Court in *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56), first in the list of those being that **consultation should occur when proposals are at a formative stage**.

Mark Brearley on behalf of Vital OKR
2nd February 2021
New Southwark Plan Examination
Appendix VOKR12

Referenced in Vital OKR Statements

Planning for the economic prosperity of the Borough including employment sites and town and local centres.

11th August 2019 email from Mark Brearley (on behalf of Vital OKR) to Cllr Stephanie Cryan regarding proposed NSP policy on office and business development, on affordable workspace, and on business relocation.

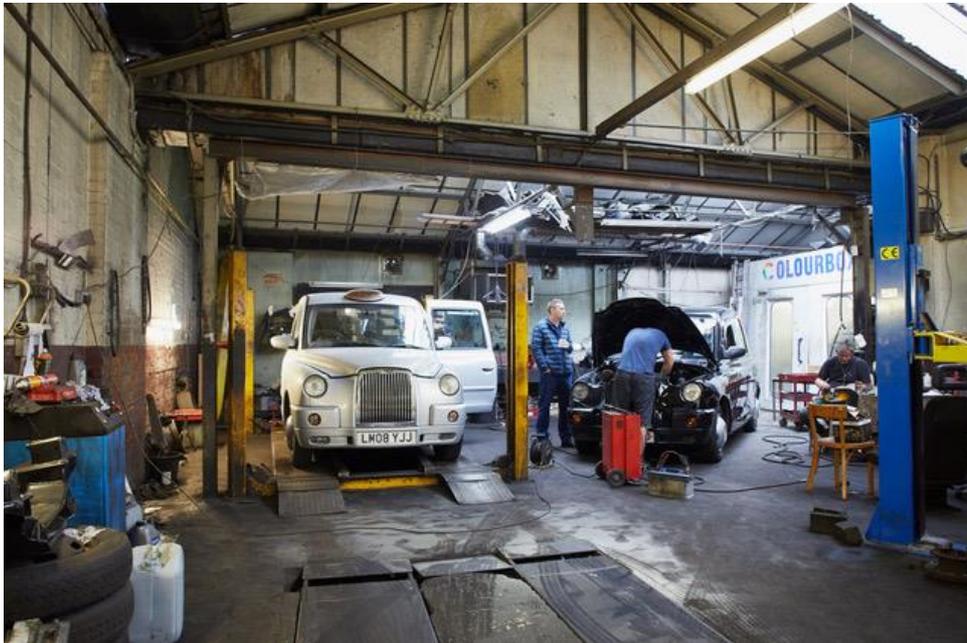
From: Mark Brearley <mark@kaymet.co.uk>

Subject: New Southwark Plan policies on office and business development, affordable workspace, business relocation.

Date: 11 August 2019 at 18:38:44 BST

To: Cllr Stephanie Cryan <stephanie.cryan@southwark.gov.uk>

Cc: Cllr Martin Seaton <martin.seaton@southwark.gov.uk>, Cllr Johnson Situ <johnson.situ@southwark.gov.uk>, Cllr Kieron Williams <kieron.williams@southwark.gov.uk>, Juliet Seymour <juliet.seymour@southwark.gov.uk>, Colin Wilson <colin.wilson@southwark.gov.uk>, "Cutts, Tim" <tim.cutts@southwark.gov.uk>, Laura Hills <Laura.Hills@southwark.gov.uk>



Hello Stephanie.

I am keen to know whether you have been able to give consideration to my 6th July email (see below), and whether the meeting I suggested to discuss the possibility of pre-submission (or pre-inquiry) amendments to these 3 New Southward Plan policies, perhaps along the lines I suggest, might be possible.

The realisation of how important it is to get these policies right, to make them tougher, has increased now we understand that loss of industrial land in Southwark to date has gone beyond double the amount that London Plan policy allows for in the period up to the 2031, an overshoot of a staggering 23ha, the result of over 80 industrial loss planning approvals being granted. It's therefore no surprise that severe industrial accommodation shortage is now hurting a large proportion of the hundreds of industrial businesses across the borough, as availability plummets, rents escalate, tenures get shakier, and evictions become more common.

Please do let me know if this can be considered more, and if you would welcome a meeting about this.

Good wishes.

Mark

Kaymet and Vital OKR

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From: Mark Brearley <mark@mboffice.org.uk>

Subject: New Southwark Plan policies on office and business development, affordable workspace, business relocation.

Date: 6 July 2019 at 18:27:23 BST

To: Cllr Stephanie Cryan <stephanie.cryan@southwark.gov.uk>

Cc: Cllr Martin Seaton <martin.seaton@southwark.gov.uk>, Cllr Johnson Situ <johnson.situ@southwark.gov.uk>, Cllr Kieron Williams <kieron.williams@southwark.gov.uk>, Juliet Seymour <juliet.seymour@southwark.gov.uk>, Colin Wilson <colin.wilson@southwark.gov.uk>, "Cutts, Tim" <tim.cutts@southwark.gov.uk>

Hello Stephanie.

It was a pleasure to meet with you recently at Kaymet and to commence a discussion about what can be done to better meet the needs of the large number of industrial businesses in Southwark.

One of the matters we briefly discussed was the New Southwark Plan emerging policies regarding office and business development (policy P26), affordable workspace (policy P28), and business relocation (policy P38).

These 3 policies are of huge significance for the borough's economy. I urge you to give some time to consideration of them, and to put forward a case for their amendment (and in one case possible deletion) in advance of the forthcoming public inquiry about the New Southwark Plan.

I attach here

an introduction to the issues with each policy and
the relevant extracts from Vital OKR's representations on these policies.

I would welcome further discussion on this crucial matter. Would a focused meeting be appropriate?

I have copied in Cllr Martin Seaton, Cllr Johnson Situ, Cllr Kieron Williams, Juliet Seymour, Colin Wilson and Tim Cutts.

Good wishes.

Mark

Kaymet and Vital OKR

NSP policy on office and business development

The key issue here is that while emerging policy P26 requires re-provision of business accommodation in developments, it allows fluidity between office and industrial types and disregards the importance of operational industrial yards. This presents a major threat to the industrial economy as office accommodation values are far higher than industrial.

Our representation on this policy was as follows:

Vital OKR representation regarding P26 Office and business development

We object to the restriction of P26 point 1 to CAZ, town centres, opportunity areas and where specified in site allocations. The policy can work well across Southwark with no location limits, and by making such an amendment NSP soundness will improve.

We object to the failure to state that the retain or increase requirement defined in 1.1 will apply to accommodation type, not just to floorspace. Without such a requirement there will be a significant loss of industrial, workshop, studio and workroom accommodation, since this is harder to incorporate in mixed developments, it generally takes up more volume, and yet it commands lower rent / sale values, than office space. This drafting inadequacy would add to the failure of the NSP to plan for the diverse accommodation needs of the borough's economy, and hence magnify its unsoundness. We suggest that wording could be added to state that development must retain or re-provide a similar mix of accommodation type, paying particular regard to matters including goods access, plan simplicity, floor loading, ceiling heights, natural light, emission management.

We object to the retain or increase requirement in P26 1.1 being only related to employment floorspace (GIA) on-site. This would cause a reduction in the provision of industrial accommodation as it does not include operational yard space. The wording should be amended to include operational yard space within the definition of floorspace, not limited to GIA.

We object to the wording of P26 point 2 because it allows exceptions to the retain or increase policy without an off-site compensatory requirement. An off-site requirement in such exceptional circumstances is required by the London Plan, and it is essential in order to ensure that the NSP meets its requirement to plan for the future accommodation needs of the economy.

We object to narrowness in the wording of the P26 Reasons para and suggest the final 2 sentences be refined to read something like this: In our central London site allocations we are requiring an uplift in employment space to help meet this growing demand and provide for the particular industrial needs of the CAZ. In our opportunity areas, town centres and major site allocations, mixed use neighbourhoods and mixed-use developments will incorporate new types of flexible business workspace accommodating manufacturing, logistics, servicing, technology, science, creative and cultural industries and the digital economy, helping to boost the number of jobs in the borough and enhance economic diversity.

Our suggested wording amendments are as follows:

P26: Office and business development

1.

~~In the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations~~ Development must:

1.1

Retain or increase the amount of employment floorspace (GIA) plus operational yard space on-site (B class use or sui generis employment generating uses), also ensuring no net loss of industrial accommodation (floorspace plus operational yard space, paying particular regard to matters including goods access, unit size, plan utility, floor loading, ceiling heights, natural light, waste and emission management ; and

1.2

Promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development. This will include a range of employment spaces including for ~~wholesale, freight, logistics, light industrial, studio, co-working, maker spaces~~ office use; and

1.3 Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand; or

2. In exceptional circumstances, the loss of ~~on-site~~ employment floorspace may be accepted ~~in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations~~ where the retention or uplift in employment floorspace on the site is demonstrably not feasible, ~~or it would be surplus to requirements (demonstrated with evidence including must be demonstrated through~~ a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand) ~~and it can be demonstrated that suitable alternative accommodation is available in reasonable proximity to the development proposed.~~

Reasons

Southwark is home to a rich and diverse range of businesses providing jobs that help boost the local economy and contribute to the success of London as a world city. Southwark has seen strong and rapid growth in employment over the last decade which continues to grow and thrive. Development will help to supply new and adaptable workspaces across the borough to accommodate this demand, including new office space, light industry and creative businesses. We expect development to grow the number of jobs, resources, knowledge and innovation in a range of sectors. To meet growing demand, Southwark needs to deliver significant growth of around 460,000 sqm of new office space which will be concentrated in the Central Activities Zone and town centre locations. This will provide 47,000 new office jobs over the next 20 years. In our central London site allocations we are requiring an uplift in employment space to help meet this growing demand, **including provision for the particular industrial needs of the CAZ**. In our opportunity areas, **town centres and major site allocations**, mixed use developneighbourhoods will incorporate new types of flexible business workspace accommodating manufacturing, technology, science, creative and cultural industries and the digital economy helping to boost the number of jobs in the borough **and enhance economic diversity**.

We want to promote the creation of new jobs whilst ensuring that there is a supply of sites and premises for businesses to grow. The retention and growth of existing small and medium enterprises will support jobs to remain in Southwark and allow established businesses to prosper alongside new uses. Annex 3 provides detailed guidance on marketing strategies.

With all these suggested amendments the text that we suggest would be as follows:

P26: Office and business development

1. In the Central Activities Zone, town centres, and opportunity areas and where specified in site allocations development must:

1.1 Retain or increase the amount of employment floorspace (GIA) on-site (B class use or sui generis employment generating uses); and

1.2 Promote the successful integration of homes and employment space in physical layout and servicing in areas that will accommodate mixed use development. This will include a range of employment spaces including freight, logistics, light industry, co-working, maker spaces and offices; and

1.3 Provide a marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand; or

2. In exceptional circumstances, the loss of employment floorspace may be accepted in the Central Activities Zone, town centres, opportunity areas and where specified in site allocations where the retention or uplift in employment floorspace on the site is not feasible. This must be demonstrated through a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved employment use through redevelopment which shows there is no demand.

Reasons

Southwark is home to a rich and diverse range of businesses providing jobs that help boost the local economy and contribute to the success of London as a world city. Southwark has seen strong and rapid growth in employment over the last decade which continues to grow and thrive. Development will help to supply new and adaptable workspaces across the borough to accommodate this demand, including new office space, light industry and creative businesses. We expect development to grow the number of jobs, resources, knowledge and innovation in a range of sectors. To meet growing demand, Southwark needs to deliver significant growth of around 460,000 sqm of new office space which will be concentrated in the Central Activities Zone and town centre locations. This will provide 47,000 new office jobs over the next 20 years. In our central London site allocations we are requiring an uplift in employment space to help meet this growing demand. In our opportunity areas, mixed use neighbourhoods will incorporate new types of flexible business workspace accommodating manufacturing, technology, science, creative and cultural industries and the digital economy helping to boost the number of jobs in the borough.

We want to promote the creation of new jobs whilst ensuring that there is a supply of sites and premises for businesses to grow. The retention and growth of existing small and medium enterprises will support jobs to remain in Southwark and allow established businesses to prosper alongside new uses. Annex 3 provides detailed guidance on marketing strategies.

NSP policy on affordable workspace

The question here is whether emerging policy P28 as drafted could over-burden investment such as to restrict the quantum of some types of businesses space in developments, therefore undermining the objective of sustaining affordability of workspace. Also, could the well intentioned objectives of P28 better be addressed by amending the scope of plan designations (such as SPIL, LSIS and Town Centre) in the NSP, refining policy related to those designations and other relevant policy (for example P26 Office and business development and P38 Business relocation), and improving and extending site allocations?

Vital OKR took the decision to request, via our representations, the deletion of policy P28 regarding affordable workspace. Of interest on this topic are observations from Jess Fern (an expert of the subject of business accommodation and planning). She has also come to the conclusion that, on balance, affordable workspace policies are doing more harm than good. She states: 'By introducing affordable workspace policies, the local planning authority is providing a signal that it is doing something positive to address a problem. The findings of this study suggest that this could be counterproductive. It provides a false sense of security that something is being done, whilst at the same time large swathes of employment land are being lost across London'

Our representation on this policy was as follows:

Vital OKR representation regarding P28 Affordable workspace

We have previously made representations (Feb 2018) on this policy, urging amendment of the wording. Those objections have not been adequately addressed by the amendments and hence still stand.

We additionally now object to the whole of P28, and ask for the policy to be deleted, as we feel that, on balance, the policy will not have a positive outcome, and will do harm to the overall supply and therefore the affordability of workspace. Attempts to implement the policy would be a significant distraction from focus on addressing the underlying business accommodation supply shortage across Southwark, a shortage that other aspects of the NSP as currently drafted would magnify. The policy attempts to address a symptom of under-supply, the escalation of rents, while the NSP as a whole fails to address the cause of the under-supply, it fails to plan for adequate supply of suitable accommodation in appropriate locations to meet needs.

We believe that P28 attempts to intervene in matters of commercial property management, letting policy and rent that are beyond the reach of the planning system. We suggest that it is inappropriate for a local plan to attempt discrimination against some businesses because of their size, the nature of their ownership, and their current business location, it is also wrong to promote differential subsidy and restrictions on access to use of accommodation in a way that would likely magnify unfairness. We believe that the policy would reduce development viability in a way that is likely to lessen the delivery of new business space of the types required to meet the full range of needs, most notably lower cost business space for such as studio and workshop / industrial use.

The NSP should instead, with policy P28 deleted, be amended to better plan for the full range of business accommodation needed in Southwark. This should be done through means of policy wording, land-use designation, site allocations, and a commitment to manage changes of use through S106 agreements, planning conditions and Article 4 Directions. Affordability is better sustained by using planning to manage the loss of older accommodation that is suitable to meet evidenced needs, and by planning so as to nurture and / or require delivery of new accommodation of appropriate types in sufficient quantity, and the right locations, to meet need.

We suggest that the seemingly well intentioned objectives of P28 could better be addressed by amending the scope of plan designations (such as SPIL, LSIS and Town Centre) in the NSP, refining policy related to those designations and other relevant policy (for example P26 Office and business development and P38 Business relocation), and improving and extending site allocations. We have previously made relevant representations (Feb 2018) that included extensive suggestions on all these aspects of the NSP.

We point out that NPPF Para 21 [instructs that investment in business should not be over-burdened by the combined requirements of planning policy expectations](#). We suggest that P28 would over-burden and thus restrict the quantum some types of businesses space in developments, thus undermining the objective of affordable workspace.

We here offer a comparison to help understanding of our objection: If there is not enough food to feed a population then the way to address the problem is to work towards sustaining and increasing the supply of food. Controlling food prices, and setting up complex arrangements to decide who deserves to get food at lower prices, is not going to solve the problem, people will still starve.

Should it be decided to retain policy P28 then we object to observe point 2 as it fails to adequately define the range of accommodation that suits the full range of small and small branch business of relevance to Southwark. If the policy is retained then we suggest that it will be useful to include reference to use types as is done in P26 point 1.2, mentioning inclusion of a range of employment spaces including smaller scale logistics, light industry, co-working, maker spaces, servicing and repair, studios and offices. We also suggest that wording could be added to state that design must pay particular regard to matters including goods access, plan simplicity, floor loading, ceiling heights, natural light, emission management. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

If policy P28 is retained, then we object to references in P28 to small and independent businesses as this excludes small branch businesses and expresses a preference relating to business ownership that is inappropriate in planning. We suggest that the legitimate intent here is to recognise the challenges of providing for smaller business units, in which category in Southwark there are many small branches as well as stand-alone small businesses. It would also be useful to recognise that a significant range of accommodation size is relevant to such occupiers: an office-based business with 50 people could be just a few hundred sq m, whereas for some industrial businesses 50 people would be in accommodation as large as a few thousand sq m. These adjustments will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

If policy P28 is retained then the Fact Box could usefully have a definition for Small branch business added: A branch operation of a medium or large enterprise, where the branch operates with 50 employees or less.

If policy P28 is retained then we object to reference to specialist workspace providers without also mentioning the role of less specialist owners who lease premises, and the valuable role of owner-occupied premises. Specialist workspace providers are most active in providing higher rent flexible term accommodation, and niche affordable accommodation, of less relevance to many sectors of the economy. The wording should be widened in order to improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

If policy P28 is retained, then we object to reference to horizontal mixed-use design, and to reference only to residential as the use that might mix with B class uses. The reference to horizontal mixed-use design implies it is the favoured development type, whereas vertical mixed-use types can be a more realistic way to achieve significant quantities of deep industrial accommodation with level access without relying on goods lifts. There should be equal reference to both formats, with encouragement that developers find the most appropriate development type to meet occupier needs. It should also be made clear that mix-use without residential, such as industrial with office, retail or education, can also play an important role. Such wording changes will improve NSP soundness in relation to making every effort to objectively identify and then meet the business needs of the area.

Jessica Ferm's email, referred to, as follows:

From: "Ferm, Jessica" <j.ferm@ucl.ac.uk>
Subject: Re: Vital OKR's representations on New Southwark Plan PSV: Amended Policies 2019, January 2019
Date: 21 May 2019 at 22:07:01 BST
To: "mark@kaymet.co.uk" <mark@kaymet.co.uk>

Dear Mark

Very interesting that you have come to that view regarding Southwark's affordable workspace policy. This was the conclusion I came to at the end of my PhD research (which mostly focused on affordable workspace policies in Hackney).

Here is the paper I wrote specifically on this issue, which is available open access and could be useful in preparing your argument (the data is a little old now but the same argument applies):

<https://www.tandfonline.com/doi/abs/10.1080/02697459.2016.1198546>

Extract from the conclusion:

"By introducing affordable workspace policies, the local planning authority is providing a signal that it is doing something positive to address a problem. The findings of this study suggest that this could be counterproductive. It provides a false sense of security that something is being done, whilst at the same time large swathes of employment land are being lost across London"

I'll read your representation with interest. Good luck with the next phase

Jess

Dr Jessica Ferm
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NSP policy on business relocation

I talked you through the tragic failure of emerging policy P38 currently. The policy is being deployed as though adopted (which is good), but sadly it is failing to deliver timely business relocation because of the weak wording, that can be interpreted as allowing relocation matters to be resolved following planning approval, rather than before, thus incentivising the speedy eviction of tenant businesses by property owners.

I mentioned the case of 180 Iderton Road where a business relocation strategy was not required with the application, rather it was required to be done later, after consent. It is now well over a year since Southwark Planning Committee's grim decision on that case, in contempt of the development plan, and 10 months since the decision notice was issued. But during all those months occupants of the building have received no help with relocation, no accommodation has been suggested nor offered, no arrangements have been put in place nor advice given. A few weeks ago they all had notice to vacate during June. This is a great tragedy, completing the expulsion of around 50 businesses, losing the area most of the 156 jobs (figure from V22, the former sub-letter) that the building sustained, further undermining the area's creative economy. Following this all that will be required to satisfy the requirement for a relocation strategy is a document containing one sentence, something like 'there are no businesses in the building, so no action on relocation is required'.

I'm sure this was not the intention of the policy, but it is what will keep on happening if the policy wording is not improved and officers start taking the matter seriously. We calculate that the net loss of businesses from the OKR area since the OA process began is around 170, and the net job loss over 650. While that's been going on there has been no sign of anyone helping with the challenge of relocation.

A review of the policy should be given high priority, and I assume that amendments could be agreed in advance of the inquiry.

It would also help if, perhaps with your encouragement, the Planning Committee could confirm that they wish to interpret the requirement of the policy to provide a business relocation strategy as a requirement that such a strategy be provided with planning applications. This single clarification could improve the prospects of many businesses and increase the chance of saving many hundreds of good jobs in the borough.

Our representation on this policy was as follows:

Vital OKR representation regarding P38 Business relocation

We here suggest a few further amendments to P38 Business relocation, on which we have previously made detailed representations (Feb 2018) objecting to lack of clarity in this policy and suggesting a series of amendments to increase its effectiveness. Our further suggestions strip out inappropriate discrimination against medium and large enterprises, while emphasising that micro and small businesses may require greater support than others through the process of relocation.

We also suggest addition of requirements for the timing of the schedule of existing businesses operating on the site and the setting out of the relocation strategy. These last requirements would address the problem, experienced recently in Southwark, of businesses being displaced after dialogue with the council has commenced, and in cases after a permission has been granted, but in advance of preparation of a relocation strategy, resulting in the loss of dozens of enterprises and hundreds of jobs.

Suggested further wording amendments as follows:

Reference to **small or independent businesses** should be replaced with simply **businesses**;

Reference to **small shops** should be deleted;

Point 1. should be amended to include **must be provided as part of a planning application**, and should have added at its end **It should take as its reference details of the businesses present at the site, verified by the council.**

Point 2i. should be expanded to read **...floorspace at the time dialogue with the council commenced**

Point 2ii. should be expanded to read **...site at the time dialogue with the council commenced**

Point 2iv. should be expanded to read **...on-site at the time dialogue with the council commenced**

Point 4ii. First sentence should be expanded to read **...assistance and support...** and should have added the sentence **Micro and small businesses may require greater support than others, and this should be reflected in the strategy**

Reasons first paragraph, first two sentence should be redrafted to read **Accommodating existing businesses is vital in order to sustain the prosperous local economy in Southwark that is made up of a wide range of enterprises. The abundance and diversity of these businesses helps...** the 3rd sentence should have addition to read **...the provision of business space of diverse types to suit needs, particularly in...** the 4th sentence should have addition to read **...local capabilities, talent...**

Reasons second paragraph should be redrafted to read **Micro and small enterprises are more vulnerable than larger companies and multiples and are unlikely to have the corporate resources available to seek specialist advice on relocation and to mitigate the risks to the business. This places a disproportionate burden on those businesses if required to relocate and may affect the overall viability of their operation. Therefore it is appropriate that greater support be given to micro and small businesses that may be affected by redevelopment.**

For reference our previous wording revision suggestions were as follows:

In point 1 **are displaced** should be replaced by **may be displaced**;

Point 2i. should be redrafted to read **Existing quantum and characteristics of non-residential floorspace (GIA and operational yards), separated by use class, including vacant units and yards;**

Point 2ii. should be redrafted to read **Schedule of existing businesses operating on the site, and businesses that have recently departed, including description, business sector, nature of the space occupied, number of employees, and occupancy status / lease terms;**

Point 2iii. should be redrafted to read **Proposed levels of non-residential floorspace (GIA and operational yards), plus details of key characteristics;**

Point v. should be redrafted to read **Details of engagement with the council and workspace providers, agents, businesses and business associations, to secure occupiers for new employment space;**

Point 3i. should be amended to read **...fit out and ownership or lease terms;**

Point 3ii. should have added at its end **...,and should be avoided when businesses are of a type for whom multiple moves are not realistic;**

Point 4ii. should have added at its end **...,this evidence should include statements from existing businesses;**

Point 4iii. should be amended to read **...no suitable premises exist, suitable premises should be identified in adjacent boroughs.**

With all these suggested amendments the text that we suggest would be as follows:

1. **Where existing businesses may be displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided as part of a planning application. The business relocation strategy must set out viable relocation options. It should take as its reference details of the businesses present at the site, verified by the council.**
2. **All business relocation strategies must include:**
 - i. **Existing quantum and accommodation characteristics of non-residential floorspace at the time dialogue with the council commenced (GIA and operational yards), listed by use class, including vacant units and yards; and**
 - ii. **Schedule of existing businesses operating on the site at the time dialogue with the council commenced, and businesses that have recently departed, including description, business sector, nature of the space occupied, number of employees, and occupancy status / lease terms; and**
 - iii.

Proposed levels of non-residential floorspace (GIA and operational yards), plus details of key characteristics; and

- iv. Details of engagement with existing businesses on-site at the time dialogue with the council commenced, regarding re-provision of premises or relocation options; and
- v. Details of engagement with the council and workspace providers, agents, businesses and business associations, to secure occupiers for new employment space.

3. Where existing businesses are accommodated in new development schemes the strategy should include:

- i. Specific business requirements including servicing, fit out and ownership or lease terms; and
- ii. Temporary relocation arrangements or scheme phasing to allow the continuation of the business during construction. Temporary relocation should be contained on-site or as close to the original site as possible, and should be avoided when businesses are of a type for whom multiple moves are not realistic.

4. Where existing businesses are proposed to be relocated the strategy should include:

- i. Reasons why existing businesses cannot be located on-site;
- ii. Details of relocation options explored with individual businesses and the assistance and support that has been and will be provided. Micro and small businesses may require greater support than others, and this should be reflected in the strategy. Evidence should be given that the relocation option is suitable for the viable continuation of the business, this evidence should include statements from existing businesses;
- iii. Identification of alternative premises in Southwark. Where no suitable premises exist, suitable and available premises should be identified in adjacent boroughs;
- iv. Statements from existing businesses should they wish to cease trading rather than relocate;
- v. Collaboration with other property owners and developers to establish whether suitable workspace for existing businesses could be accommodated in different phases of the development programmes.

Reasons

Accommodating existing businesses is vital in order to sustain the prosperous local economy in Southwark that is made up of a wide range of enterprises. The abundance and diversity of these businesses helps to boost local employment and the distinctive character of local neighbourhoods. Regeneration should help to increase the provision of business space of diverse types to suit needs, particularly in new mixed use neighbourhoods. However it is important to ensure that any existing businesses are carefully considered in redevelopment schemes, either to be re- provided where phasing allows, or to be relocated in Southwark to ensure the borough retains its local capabilities, talent and commercial creativity.

Micro and small enterprises are more vulnerable than larger companies and multiples and are unlikely to have the corporate resources available to seek specialist advice on relocation and to mitigate the risks to the business. This places a disproportionate burden on those businesses if required to relocate and may affect the overall viability of their operation. Therefore it is appropriate that greater support be given to micro and small businesses that may be affected by redevelopment.

I look forward to hearing from you on this matter.

Good wishes.

Mark

Kaymet and Vital OKR



The **Hamilton & Palmer** coachworks offered good and skilled employment for 24 people, most of them local. They were recently evicted from the Sandgate Trading Estate (part of the Ruby Triangle site) and it is known that they are now struggling to survive in Kent, having failed to find alternative premises. They are one of the 5 businesses that have already departed from this site as the owner pushes for approval of a massive development that would dramatically reduce the amount of industrial accommodation in the Sandgate Street area, regardless of its current protected status as Strategic Industrial Land and draft policies (that already have strong status) from the Mayor of London requiring 'no net loss' of industrial accommodation from the Old Kent Road area. Meanwhile Southwark Council seem not even to know about the businesses that have been evicted, nor much about others still on site, and are doing nothing to help them stay and thrive in the area where they want to be.