

## Industrial Land LPG

The following points were made to the London Plan team manager Lisa Fairmaner in response to the consultation on this draft London Plan Guidance.

1. London Forum (LF) is pleased to see that draft guidance has been published although it is concerned about the length of time it has taken to publish this guidance which hangs off policies E.4-E.7 of the London Plan (2021). The Forum hopes that future supplementary guidance which is dependent on London Plan policies will be published in a more timely way and preferably contemporaneously with the next London Plan.

2. London Forum is concerned that the draft guidance seems to promote an alternative way to go about industrial land supply and demand studies for the evidence base for Borough Local Plans to that set out in the government's NPPF. This could lead to confusion at Local Plan Examinations where Local Plan Inspectors are more likely to feel obliged to follow NPPF guidance rather than GLA guidance. This could result in delays in the Local Plan Examination process as additional work is required by Inspectors and subsequent delays in Local Plan adoption.

3. London Forum is surprised that the draft guidance does not contain some spatial guidance about the amounts of industrial and associated floorspace which should be provided across different geographical sectors of London. While the designations of Strategic Industrial Land in the Plan are clearly beneficial it is in places such as the Central Activities Zone and south-west London where there is particular pressure for the loss of smaller industrial pockets to higher value land uses such as residential. This pressure is, of course, all the greater following the publication of the Katkowski Review of the London Plan and the subsequent statements published by the Secretary of State.

4. London Forum is concerned about the level of detail in the later sections of the draft guidance regarding intensification and co-location. While Jorn Peters was emphasising at the NLA event on 20/2/24 that the design principles were very much non-prescriptive there is a risk that they could be applied in a prescriptive way by less experienced or knowledgeable development management staff at borough level leading again to delays in securing planning permissions for developments required to ensure London's continued and future economic prosperity. The opportunities to develop and apply the principles set out in the 'design guidance' are probably most appropriate in larger scale industrial areas and could be far too limiting in areas that already have a more dense mixed use development pattern.

5. London Forum is particularly concerned about and opposed to the implied consequence contained within the draft guidance that residential uses forming part of co-located developments could be put at greater risk of noise and disturbance and even danger to life and limb as a result of closely neighbouring co-located 'industrial' uses which either fall within the B2 use class and/or operate as a class E use 24/7 or at anti-social hours or contain structural or other materials and substances which pose fire risks. This is not to say of course that residential can't be mixed with traditional town centre uses at the retail and leisure end of class E.

John Allen on behalf of

London Forum of Amenity and Civic Societies