



# **Lewisham Local Plan**

## **Examination Hearing Sessions**

### **Response to Actions**

### **Matter 6: Employment (Policies EC1 and EC2)**

**Prepared to inform the Local Plan Examination**

**November 2024**

## 1. Introduction

- 1.1 This Paper is one of a short series that provides the London Borough of Lewisham's (the Council's) response to further actions raised through the Inspectors' post hearing letter (IN5).
- 1.2 The Paper seeks to respond to a specific request for further information that follows up on discussions during the examination hearing sessions, on Tuesday 25<sup>th</sup> June 2024, that focused on Matter 6 Employment.
- 1.3 The Paper contributes towards the Council's response to the request for further information raised under Matter 6 Employment; it provides a continuation to the submitted document LC46A in response to Action 44 on Matter 6 Employment.

## 2. Town Centres (Policies EC1 and EC2)

### Post Hearing Action 44 Employment land requirement (Policies EC1 and EC2):

*“Provide data showing B2 and B8 employment floorspace requirement for specific sectors and show net loss or job growth figures. Provide more detail examples of delivery of floorspace requirements and specific uses determined through pre-application process (for example, Creekside) for the Hearing session on monitoring.”*

**Inspectors' Post-Hearing Letter Information Request** –the Inspectors have made a further request for information/ clarification in their Post-Hearing Letter (IN5) that relates to Matter 6 Policies EC1 and EC2. Their request comprised the following –

*“AP44 related to the need to understand the jobs growth for B2 and B8 use classes. The Council's response reiterated the narrative of the Plan and also directed us to the Lewisham Industrial Employment Land Study 2023 (LC1/EB22) whereby tables 3.2 and 3.3 set out employment projections by sector in Lewisham. We have also been referred to the 2019 Employment Land Study (EB26) in paragraphs 6.15 and 6.17 on sectoral jobs' growth forecasts.*

*However, we need clarity regarding what these forecasts specifically indicate in terms of jobs growth or losses in the B2 and B8 use classes? How have the broader sectoral jobs growth forecasts been converted into jobs growth forecasts for B2 and B8 uses. Is there a paragraph/table or section within the employment evidence base that sets these two points out clearly? If not, could the Council indicate a date by which this could be done and submitted please.”*

- 2.1 In response, the Council considers that its original response to Action 44 (LC46A) provides a useful contextual position on this matter. The Council suggests that its original response be read alongside this response to the Inspectors' request for further information.
- 2.2 In preparing its further response, the Council has consulted with its external expert on this matter Dave Lawrence of CAG Consultants. He is the author of many of the technical evidence base documents that relate to industrial employment land forecasting and provision. Notably, these include the Local Economic Assessment 2018 (EB27); the Employment Land Study 2019 (EB26); and the Lewisham Industrial Employment Land Report 2023 (EB22/ LC1). The Council contends that he is well placed to provide an authoritative answer to the Inspectors' questions on this matter.

2.3 In providing a response to the Inspectors' further questions, Dave Lawrence clarifies that –

*“Table 3.2 of the Lewisham Industrial Employment Land (2023) report shows industrial employment projections, those sectors that would be most likely to occupy B2 and B8 land, for the period 2023-38. These show a projected loss of 100 industrial jobs over that period.*

*These are translated into industrial land and floorspace projections in Table 3.3, showing the floorspace density and plot ratio assumptions used. This shows a projected loss of -1.5 ha of industrial land.*

*But employment projections are not the only method of projecting demand for industrial employment floorspace. Nor are changes in employment the only reason demand for industrial floorspace changes over time. London's industrial land has been used more intensively accommodating a higher number of jobs per hectare. The London Industrial Land Supply Study (2023), for example, shows rising industrial employment at the same time as decline in industrial land.*

*Therefore, the report also analysed a projection of demand based on trend change in stock. This produced a projected demand for industrial land of -7.1 ha over the period 2023-38 as set out in section headed Trend Floorspace Projections on page 13 of the report.*

*Use a combined projection of the sector forecast (-1.5) and floorspace trends (-7.1) gives an average of -4.3 ha.*

*To this is added a forecast for demand for waste which is considered to be one of the users of industrial land as set out in the London Industrial Land Demand Study, This was to maintain consistency with the 2019 Lewisham Employment Land Study and the London Plan projections for industrial land on which it was based.*

*The addition of -2.8 ha for waste produces a total demand for industrial land of -7.1 ha as set out in Table 3.4 of the Lewisham Industrial Employment Land (2023).*

*Hopefully this explains how the projections of employment for B2 and B8 uses were used to inform the industrial land demand projection for LB Lewisham.”*

2.4 The Council contends that the above provides a suitably satisfactory response to the Inspectors' further questions on this matter. It is highlighted that the Lewisham Industrial Employment Land Report 2023 (EB22/ LC1) Table 3.2 sets out future industrial employment land projections. These are further translated into industrial land and floorspace projections within the same document's Table 3.3.

2.5 It is further noted that employment projections are not the only method of projecting demand for industrial employment floorspace, and that neither are changes in employment the only reason demand for industrial floorspace changes over time. It is noted that Dave Lawrence provides further clarification on this matter, inclusive of how the Lewisham Industrial Employment Land Report 2023 (EB22/ LC1) considers this issue.