



# Lewisham Local Plan

## Employment Background Paper

Prepared to inform the Local Plan Examination  
March 2024

LONDON BOROUGH OF LEWISHAM

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## Summary

- The Council considers that the new Lewisham Local Plan identifies an appropriate approach towards protecting existing provision, and securing and managing the delivery of new employment land and uses as a component of successful and sustainable place-making across the Borough during the plan-period.
- The new Lewisham Local Plan's Spatial Strategy is entitled "Delivering an Open Lewisham". It serves to provide an overarching policy for the Local Plan that is the starting point for implementing the Vision for Lewisham and responding to the plan's strategic objectives. This sets the context of how the new Local Plan will secure "A Thriving Local Economy that Tackles Inequalities".
- The new Lewisham Local Plan's approach towards employment land and uses is set out under its Chapter 8 Economy and Culture. This sets out a logical sequential approach towards the growth and management of the Borough's economic activities across the plan-period. These commence with policies that set out an overarching policy position. The Chapter continues with policies that expand upon how Lewisham's Employment Land Hierarchy will be managed through the delivery of new growth. This includes policies that relate to Strategic Industrial Locations, Locally Significant Industrial Sites, Mixed-use Employment Locations, and Non-designated Employment Sites respectively.
- Where it is necessary the new Local Plan provides Lewisham's Strategic Industrial Locations, Locally Significant Industrial Sites, and Mixed-use Employment Locations with further detail and guidance through site allocations that are included in Part Three Lewisham's Neighbourhoods and Places.
- The new Lewisham Local Plan's approach towards employment land and uses has been informed, or justified, by a wide range of supporting technical evidence. This includes the Lewisham Employment Land Study (CAG Consultants/ Aspinall Verdi March 2019 – EB 26) and the subsequent Lewisham Industrial Employment Land Study (CAG Consultants, November 2023 – EB 22). The outputs from the local level technical evidence demonstrate that the apparent losses identified by the high-level London Industrial Land Supply Study 2020 are entirely in accordance with planned-for position. In parallel, the local evidence demonstrates that industrial employment capacity is higher than anticipated.
- The Council considers the new Local Plan's approach towards managing employment land, particularly in terms of industrial provision, to be consistent and in general conformity with that set out in the London Plan. The Council is dedicating resources to secure a Statement of Common Ground with the Greater London Authority that will confirm this position. This process has been on-going since May 2023.
- Evidence demonstrates that the nature of the local industrial employment market is evolving beyond traditional accepted use definitions. This restructuring provides opportunities for new forms of industrial employment uses to come forward, establish themselves and positively contribute to place-making. The Council considers that the intelligent management of Class E Uses – specifically those defined under Class E (g) – can make a positive contribution towards meeting shared objectives for industrial employment land and uses.

- In summary the Council and the Greater London Authority have thoroughly discussed the nature and scale of employment land supply, need, gains and losses. The Council considers that the outputs of that discussion meet the Greater London Authority's stated objectives and concerns. To further meet their requests the Council is prepared to introduce a performance monitoring regime that ensures that shared objectives for employment land and uses continue to be met, and that there is no net loss in capacity.
- The new Local Plan's approach is also consistent with national planning policy, being in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where those are relevant.
- The new Local Plan sets out a justified and effective employment land hierarchy for Lewisham. The approach incorporates Strategic Industrial Locations, the locally designated provision at Locally Significant Industrial Sites and Mixed-use Employment Locations, and non-designated sites. This is consistent and in general conformity with the London Plan.
- The identification of Locally Significant Industrial Sites and Mixed-use Employment Locations is an established and proven approach to managing employment land and uses at these places. The new Local Plan's approach to these is a clear and logical evolution of policy from the previous version of the local plan. The new Local Plan's Locally Significant Industrial Sites are directly related to the previous Local Employment Locations, which have always been analogous with the locally significant industrial locations defined within the London Plan.
- The redesignation of the Apollo Business Centre, Evelyn Court, and Trundley's Road sites as Locally Significant Industrial Sites is justified and reflects the factual position of decision-taking and other consents gained through the development process (inclusive of prior approval) and is sound. This also provides a pragmatic solution for the necessary regeneration of the three sites through industrial employment-led redevelopment.
- The approach of identifying the Bermondsey Dive Under site as a new Strategic Industrial Location is considered sound and justified. This is in accordance with London Plan Policy E7 industrial intensification, co-location, and substitution. The Council is preparing further supplementary evidence that will provide the Greater London Authority with the necessary comfort that the Bermondsey Dive Under functions as strategic industrial employment land.
- The Council continues to work closely and positively with the Greater London Authority to ensure that the new Local Plan, its Spatial Strategy, site allocations and planning policies align and are in accordance with the London Plan. The Greater London Authority's comments to the Publication version (Regulation 19) of the new Local Plan demonstrate that they are supportive of the Spatial Strategy. Specifically, that the Mayor agrees that the new Local Plan sets out an appropriate spatial strategy for securing planned-for growth during the plan period. Work on a Statement of Common Ground between the Council and the Greater London Authority is at an advanced stage, with considerable resource being committed to that process by the Council.

## **1. Introduction**

- 1.1 Lewisham Council (the Council) has prepared the following background paper for the new Lewisham Local Plan, which speaks to Employment related matters. It seeks to provide a supplementary narrative on this matter and respond to questions raised by the appointed Inspectors. The Background Paper is submitted to the examination for consideration and reference.
- 1.2 The Employment Background Paper follows the Lewisham Industrial Employment Land Study (CAG Consultants, November 2023 – EB 22), which formed part of the Council’s new Local Plan Submission package to the Secretary of State. The Study provides the examination with supplementary technical evidence on employment land matters. It presents an analysis of recent industrial land trends in Lewisham drawing on the London Industrial Land Supply Study published in 2023. It also in part seeks to positively respond to comments made by the Greater London Authority as part of their representation to the publication stage (Regulation 19) of the local plan-making process. The Background Paper provides the examination with a clear narrative of how the Study responds and contributes towards resolving some of the matters raised by the Greater London Authority.
- 1.3 As stated, the Background Paper will seek to respond to specific questions raised by the Inspectors. These include an overview of how the plan-making process undertook to forecast employment floorspace need, and an explanation of how the new Local Plan is in general conformity with the London Plan.
- 1.4 The Background Paper will be submitted to the examination in alignment with the Council’s responses to the Inspectors’ Initial Questions and will help inform the process as it moves towards the subsequent Matters, Issues and Questions.

## 2. **A Thriving and Inclusive Economy**

### Vision, Strategic Objectives and Spatial Strategy

- 2.1 The new Lewisham Local Plan (PD01) sets out a spatial strategy for the Borough under its Chapter 3 Vision, Strategic Objectives, and the Spatial Strategy. It serves to provide an overarching policy for the Local Plan that is the starting point for implementing the Vision for Lewisham and responding to the plan's strategic objectives. It sets out the spatial strategy for the Borough that is the land use and planning framework for the Council and its partners to manage growth and development, as well as to guide new investment up to 2040. The spatial strategy also serves to provide the key link between the Local Plan and the London Plan. It seeks to ensure that Good Growth is delivered in a way that responds to Lewisham's distinctiveness. Further detail on the Spatial Strategy is provided through the Lewisham Local Plan Spatial Strategy Background Paper, which is being submitted in parallel with the Background Paper.
- 2.2 The new Local Plan opens by setting out a Vision for Lewisham, which seeks to address the key challenges facing the Borough across the plan-period. The Vision is articulated through the Council's Strategic Objectives which are set out sequentially under Table 3.2: Lewisham Local Plan – Strategic objectives. These include a set of three objectives relating to the evolution of the Borough's economy. These are set out under Table 3.2 C A Thriving Local Economy that Tackles Inequalities 5 – 7. These objectives, along with their siblings, are subsequently incorporated into Policy OL 01 Delivering an Open Lewisham (spatial strategy), which follows. The spatial strategy is subsequently followed up by the new Local Plan's general planning policies, which are set out under their respective topic headings, and then further translated into the Neighbourhood and Place policies and their component site allocations.
- 2.3 The new Lewisham Local Plan's Spatial Strategy has been closely informed by the London Plan, which sets out an approach for London's future that seeks to secure good growth – namely, growth that is socially and economically inclusive and environmentally sustainable. The London Plan, and its associated technical evidence base has helped shape the Spatial Strategy in distributing growth and investment across the Borough to meet identified needs.

### Economy and Culture

- 2.4 The new Lewisham Local Plan directly addresses the strategic objectives identified under Table 3.2 C A Thriving Local Economy that Tackles Inequalities through the topic heading Economy and Culture (Chapter 8). Under its component planning policies EC 01 – EC 21, the Chapter sets out a logical sequential approach towards the growth and management of the Borough's economic activities across the plan-period. These commence with policies that set out the overarching policy position – in respect of securing thriving and inclusive local economy that provides everyone with access to high quality education, training, and good job opportunities (Policy EC 01); meeting need/ demand (Policy EC 02); securing quality provision (EC 03); and affordability (EC 04).
- 2.5 The Chapter continues with policies that expand upon how Lewisham's Employment Land Hierarchy<sup>1</sup> will be managed through the delivery of new growth. This is set out under Policies EC 05, EC 06, EC 07, and EC 08. These address Strategic Industrial Locations, Locally Significant Industrial Sites, Mixed-use Employment Locations, and Non-designated Employment Sites respectively.

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<sup>1</sup> See the new Lewisham Local Plan (PD01) Table 8.1 for an overview.

- 2.6 The employment specific planning policies conclude with Policy EC 09, which focusses upon the particular requirements associated with employment sites located within or comprised of railway arch locations; and Policy EC 10, which seeks to ensure that new growth contributes towards workplace training and job opportunities. The Council considers the latter an important component of securing successful and sustainable places that genuinely meet the needs of residents and local communities. It does so by setting out a formula approach towards calculating financial contributions for workplace training<sup>2</sup>.
- 2.7 The Chapter continues by setting out general planning policies that relate to the approach towards growth in the Borough's Town Centres; under Policies EC 11 through EC 21. These are the policies that would in previous versions of the Borough-wide local plan have focussed upon retail and other related high street commercial activities. Within the current environment, specifically the more permissive regime that has followed the reclassification of activities under Class E, this part of the Chapter is best described as addressing the approach towards focussing growth on the Borough's hierarchy of centres<sup>3</sup>, and the broad range of main town centre uses that contribute towards their success and sustainability. This is important because the intelligent management of Class E uses provides a genuine opportunity for potentially securing a wider range of economic/ commercial activities, including industrial employment uses at appropriate sites within the Borough's centres. Such intelligent management can make a valuable contribution towards successful and sustainable place-making.

### **3. Identifying Future Employment Need**

- 3.1 National planning policy<sup>4</sup> states that local plan-making and decision-taking should – *"...create the conditions in which businesses can invest, expand and adapt"* and that *"...significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"*.
- 3.2 It continues<sup>5</sup> by setting out the actions and interventions that should be considered through local plan-making. It is noted that in contrast to its approach towards delivering a sufficient supply of homes<sup>6</sup>, national planning policy does not provide explicit guidance requiring local plan-makers to identify (within policy) a specific employment land/ floorspace requirement; disaggregate need for different employment uses or use classes; nor set an annual target for delivery/ supply. Furthermore, it is noted that whilst the national planning practice guidance provides a useful overview of how plan-making authorities can determine the type of employment land that is needed<sup>7</sup>, it is also unspecific as to how this is expressed within published policy.

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<sup>2</sup> See the new Lewisham Local Plan (PD01) Table 8.3 for an overview.

<sup>3</sup> As set out under Policy OL 01 Spatial Strategy and identified under Figure 3.3: Borough-wide Spatial Strategy plan.

<sup>4</sup> See NPPF Paragraph 85.

<sup>5</sup> See NPPF Paragraph 86.

<sup>6</sup> See NPPF Chapter 5, specifically Paragraphs 61 and 63.

<sup>7</sup> See (N)PPG Paragraph: 025 Reference ID: 2a-025-20190220

3.3 Within this context the London Plan provides some helpful guidance to the Capital's local plan-makers. In sequential order, the London Plan Policy E2 Providing Suitable Business Space states that *"Boroughs should include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand"*. The London Plan Policy E4 Land for Industry, Logistics and Services continues by stating that *"A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution"*. The new Lewisham Local Plan was prepared within this context.

#### The Lewisham Employment Land Study March 2019

3.4 To inform the new Lewisham Local Plan, Borough-specific technical evidence on employment land supply and demand was produced. This initially comprised the Lewisham Employment Land Study (CAG Consultants/ Aspinall Verdi March 2019 – EB 26). The Study provides a proportionate and up-to-date technical evidence base that informs policy development in respect of employment land management. It provides an assessment of employment land supply and demand for the Borough, considering the projected future requirements over the plan-period<sup>8</sup>.

3.5 The Study provides forecasts of demand for employment land and premises in Lewisham. These are set out under the Study's Chapter 6. It is highlighted that the Study's forecasting starting point was work undertaken by the Greater London Authority to inform the London Plan. Within this context the Study considered three categories of employment land:

- Offices (B1a)– for which the starting point is the London Office Policy Review 2017;
- Industrial (B1b, B1c, B8) – for which the starting point is the London Industrial Land Demand Study (2017);
- All other (Non-B-class) employment.

3.6 The Study noted that the Greater London Authority does not produce a sectoral breakdown of forecasted need at London borough level. Consequently, the Study generated borough sector forecasts assuming that each sector grows at the same rate as the London sector forecasts. The Study sets out the results of this exercise under Table 6.2.

3.7 The Study makes a series of recommendations for plan-makers from Paragraph 8.30 onwards. The following key points are highlighted –

- Paragraph 8.31 – *"To meet the forecast net addition to stock of 10,000 sqm for the period 2018-33, Lewisham needs to identify an additional 16,800 sqm of office floorspace (B1a/b) over and above that already in the pipeline. To meet the forecast net addition to stock of 15,000 sqm for the period 2018-38,*

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<sup>8</sup> Within the specific context of the Lewisham Employment Land Study (EB 26) the forecasts assumed 15- and 20-year planning horizons for the Lewisham Local Plan, specifically 2018-33 and 2018-38. EB 26 Paragraph 6.1.



*Lewisham needs to identify an additional 21,800 sqm of office floorspace over and above that already in the pipeline”.*

- Paragraph 8.32 – *“In terms of industrial land, the London Plan benchmark release figure of -12.4 ha over the period 2016-41 has already been released – both through plan-led consolidation and other cumulative losses through the development process - and hence no further net loss is appropriate”.*
- Paragraph 8.33 – *“Both these targets should be closely monitored as new evidence emerges as to the ways in which different forms of economic activity occupy commercial floorspace and changing technologies and working practices generate demand for different forms of space. There is no longer a binary choice for many businesses as to whether they occupy office or industrial premises, and planned provision needs to keep pace with occupier demand”.*
- Paragraph 8.39 – *“All of Lewisham’s designated employment sites, whether SIL, LEL or MEL are performing a valuable function, should be safeguarded and intensification of use sought where opportunities arise”.*

3.8 The Council considered the Study’s recommendations through the preparation and publication stages of the plan-making process. In quantitative terms, the new Lewisham Local Plan’s Economy and Culture planning policies reflect the Study’s forecasting conclusions and recommendations. The Council highlights that relevant policies seek –

- To safeguard Lewisham’s employment land hierarchy for Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses.
- To respond to the need forecast for 21,800 square metres of net additional employment floorspace in the Borough up to 2038.
- Retain and wherever possible deliver net gains in industrial capacity, including through intensification, within Strategic Industrial Locations and Locally Significant Industrial Sites; and
- To secure the comprehensive redevelopment of Mixed-use Employment Locations to facilitate their renewal and regeneration and to secure provision for a range of commercial uses, including new modern workspace with priority given to Class E(g) office and light industrial uses.

3.9 Intelligence derived from the Study was incorporated into the preparation of the new Local Plan. This is evidenced through the Local Plan Tracked Change Version Jan (2023 – PD 14), which demonstrates the evolution of the new Local Plan from preparation through to publication. The following are cited as examples of how the Council has positively considered and applied the evidence through the plan-making process –

- EC 2 Protecting employment sites land and delivering new workspace (PD 14 Page 162) – demonstrates how the Council applied the outputs from the Study (EB 26) to identify an overall forecast need for net additional employment floorspace. This also demonstrates how the plan-making process has responded to an irrevocable changed use class environment that makes the orthodox disaggregation of employment floorspace by use classes meaningless.
- Chapter 13 Lewisham’s Neighbourhoods and Places Paragraph 13.8 and Table 13.1<sup>9</sup> – this part of the new Local Plan summarises the overall delivery outcomes expected from the site allocations. It demonstrates that the plan-

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<sup>9</sup> Further information on the evolution and content of Table 13.1 is set out under Lewisham Local Plan Site Allocations Background Paper (October 2023 – EB 15) Section 11 Table 4.

making process has identified a sufficient supply of sites, with enough capacity to meet and exceed the Borough's housing targets as well as exceeding the needs identified through the Employment Land and Retail Capacity Studies.

- Chapters 14 – 18 Lewisham's Neighbourhoods and Places Site Allocations (PD 14 – Page 341 onwards) – this shows how the site allocations have evolved through preparation onto publication. Specifically, in relation to site areas, indicative capacity and the mix of uses being allocated. This is explained in further detail in the Lewisham Local Plan Site Allocations Background Paper (October 2023 – EB 15) Section 8.

3.10 Throughout the preparation and publication stages of the plan-making process, the Council has sought to positively engage with its relevant partners. This has included the Greater London Authority, who the Council continues to consider a key partner in terms of plan-making, decision-taking, and infrastructure investment. During the preparation stage of the process, they made several comments on the new Local Plan's policy approach and supporting evidence for managing the provision of employment land<sup>10</sup> –

- Comments on the Major Town Centre status of Lewisham and Catford Town Centres and the associated need for the new Local Plan to reflect the changes to the Use Class Order that redesignated business, employment and retail uses under Class E – these comments were noted, and the new Local Plan amended accordingly.
- The Mayor welcomed the commitment to retain industrial capacity within Strategic Industrial Location and Locally Significant Industrial Sites.
- It was suggested that the new Local Plan should identify, coordinate, and transparently set out the overall land and floorspace requirements as well as provision of an appropriate mix of industrial uses that meets the need for all industrial functions, particularly within Use Class B8. It was specifically suggested that there be greater focus on the provision of B8 within Strategic Industrial Location and Locally Significant Industrial Sites – this comment was made on the assumption that the new Use Class E could potentially erode former B1(c) uses within these designated sites. The Council took note of this advice and responded by stating that technical evidence demonstrates which sites are considered suitable and are deliverable to secure industrial intensification. It was noted that many of these opportunities are within Locally Significant Industrial Sites. This approach has been broadly supported by landowners of identified sites. Nevertheless, the new Local Plan was amended<sup>11</sup> to provide more clarity around acceptability of B8 uses within Strategic Industrial Locations, and elsewhere; and to include additional policies on the use of planning conditions to ensure that new Class E(g) uses delivered are secured over the long term, and not lost through changes of use to other Class E uses.

#### London Industrial Land Supply Study 2020

3.11 This document was prepared by independent consultants for the Greater London Authority. It seeks to provide a comprehensive review and update of the London industrial land supply baseline. It builds upon the London Industrial Land Supply Study 2015.

3.12 Although applying an industrial land supply baseline position for 2020, the document itself post-dates the London Plan, with its publication taking place during March 2023.

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<sup>10</sup> See Regulation 18 Consultation Statement on Main Issues and Preferred Options PD 12 Page 172.

<sup>11</sup> See the Local Plan Tracked Change Version Jan (2023 – PD 14).

The document states that it represents high-level desk-based research reflecting the best information available to the independent consultants. It adds that the Greater London Authority has also not independently checked the data and cannot take responsibility for its accuracy. It is explicitly considered to represent a starting point for local evidence work to inform plan preparation and plan-making.

- 3.13 The document's data content is an assessment of information, relating to changes in uses, gains and losses, supplied by London boroughs, this being derived from their decision-taking monitoring processes. By its very nature the document is strategic in scope and outputs.
- Lewisham Industrial Employment Land Report 2023
- 3.14 In parallel to the publication and consultation upon the new Lewisham Local Plan<sup>12</sup>, the Council discharged its duty<sup>13</sup> under Section 24(4)(a) of the Act by formally requesting that the Mayor of London provide an opinion on its general conformity with the London Plan. This request was made on 1 March 2023. In response, the Greater London Authority submitted, on 24 April 2023, comments on the new Local Plan. It is noted that the Greater London Authority took nearly eight weeks to respond to the request.
- 3.15 The purpose of the Study is to present additional and more up to date evidence on employment land matters to inform the Lewisham Local Plan Examination in Public process. In particular, the Study focuses on the matter of industrial employment land. Following lengthy detailed discussions with Officers of the Greater London Authority it also seeks to respond to their specific concerns of general conformity. It seeks to achieve this by providing necessary evidential comfort that the new Local Plan's approach towards managing industrial employment land is justified. It does this by providing a more detailed, Lewisham specific assessment of data relating to demand, supply, gains and losses.
- 3.16 The Study commences by exploring Industrial Land Supply. It notes the key headline from the London Industrial Land Supply Study 2020, that in 2020 57.1% of Lewisham's industrial land was occupied by core industrial uses, 34.3% by wider industrial uses, 4.1% was vacant land or buildings and just 4% was occupied by non-industrial uses. Offices accounted for just 1% or 1 ha of Lewisham's industrial land. This approximated distribution for London as a whole. It continued by highlighting that over the period there has been a reduction of 14 ha of occupied industrial land – predominantly from non-designated sites. This is summarised under the Study's Table 2.1. However, the Study clarifies that this scale of loss was anticipated and is actually in accordance with the recommendations for the Lewisham Employment Land Study (2015), which itself was consistent with the London Plan benchmark release figures prevailing at the time. The Study maps loss under Figures 2.1 and 2.2.
- 3.17 Continuing, the Study clarifies that whilst the Borough has experienced some loss of industrial land, the reduction in industrial capacity has been less significant. Indeed, closer examination demonstrates that the stock of industrial floorspace in 2022 was at the same level as 2020 – having remained broadly constant since 2017. This is confirmed by analysis of planning permissions and completions data which shows that there was a net gain of 15,563sqm of industrial floorspace on completed developments

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<sup>12</sup> On its commencement on 1 March 2023, under Regulation 19.

<sup>13</sup> Regulation 21.

and a net loss of -3,200 sqm on developments currently under construction. In conclusion providing an actual net gain of just over 12,353 sqm of industrial floorspace in Lewisham over the period 2015-23.

3.18 The Study provides an up-date to the forecast demand for Lewisham between 2023 until 2038, which is a period that parallels the required fifteen-year housing land supply projection. The Study notes that losses anticipated by the Lewisham Employment Land Study (2015) have in the main been released. In this respect the council agrees with the Greater London Authority that there is no further capacity for release and that consequentially plan-making and decision-taking should seek to prevent any losses in industrial employment provision. The Council anticipates that this will be acknowledged through the Statement of Common Ground between the two partners.

3.19 It is highlighted that the Study sets out the pipeline of committed releases, which is significant as this addresses the three Strategic Industrial Locations being redesignated as Locally Significant Industrial Sites. For example, it is noted that apart from a small amount of residual activity on Trundley's Road and temporary use on the Apollo Business Centre, no industrial activity takes place on them. For full clarity, the factual position on all three redesignated sites is as follows –

- **Evelyn Court at Surrey Canal Road Strategic Industrial Location (Policy LNA SA 03)** – The site is subject to a consent gained through the Prior Approval process. This confirms the use of the site as being comprised of residential and vacant land. The latter component recorded as being inactive for in excess of 10 years – vacant for 10 years plus. The current factual position is that there is active pre-application engagement with a development partner that seeks to redevelop the site through an employment-led colocation scheme.
- **Surrey Canal Road and Trundley's Road Locally Significant Industrial Site (Policy LNA SA 05)** – Only a small proportion of the site is in active industrial use, with the remainder being comprised of a vacant site/ residential uses. The site now has approval for an employment led co-location scheme. This is supported by the Greater London Authority, acting as a decision-taker. The approved schemes is under construction.
- **Apollo Business Centre Locally Significant Industrial Site (Policy LNA SA 06)** – The factual position is that there is a resolution to grant consent for an employment-led co-location scheme.

3.20 It is at this point that the Study speaks to the Bermondsey Dive Under<sup>14</sup> site, which is being designated as a mix of Strategic Industrial Location and Locally Significant Industrial Site provision. The Study pronounces that the site is capable of accommodating the types of uses that were previously located on the Apollo Business Centre and Trundley's Road sites, as well as accommodating other forms of industrial activity that require separation from residential premises. It notes that the site is

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<sup>14</sup> The Bermondsey Dive Under is a significant piece of rail infrastructure to the south of London Bridge Station constructed to address rail traffic congestion, which was completed during 2018. Within the current plan-making environment it refers to a suite of industrial employment sites located in Southwark and Lewisham.

comprised of current unused railway arches<sup>15</sup> and railway land that is in active use by Network Rail for strategic industrial employment purposes<sup>16</sup>. The Study concludes that the site is capable of accommodating most of the uses set out in the London Plan Policy E4 Land for industry, logistics and services to support London’s economic function, with the only constraints being those that need to operate at large scale or require frequent or large vehicle trips. The Council considers that this approach is in accordance with London Plan Policy E5 Strategic Industrial Locations and Policy E7 industrial intensification, co-location, and substitution. In terms of the former, the approach does proactively manage provision through plan-making. In the latter, it does facilitate the potential for further intensification of uses on land already in active strategic employment uses.

- 3.21 The Study proceeds to explore the nature of demand projected over the plan-period. This is important because it seeks to identify the types of industrial employment and premises that will be needed by businesses. It is particularly noteworthy in describing how industrial activities are evolving. The following text is highlighted –

*“These dynamic service industries themselves draw upon a vast range of support activities. A standard office building, for example, will buy in a range of products and services on a daily basis, such as: catering; cleaning; furniture; maintenance and fit out; office equipment and supplies; print and copy; security; waste disposal, and many others. Multiplied across the economy, this creates a huge demand for such supporting activities. This activity is often referred to as ‘servicing the services’”.*

*“Much of this activity is situated on land designated in planning policy as ‘industrial’ or ‘employment’ land, even though most of the activities are not ‘industrial’ in the commonly understood sense of firms making goods”.*

And – *“Many industrial buildings are occupied by support, or service, activities, with a high proportion of the activities taking place in them being ‘clean’, often employing a high proportion of professional, skilled, and technical workers. Many do not involve ‘making things’, but rather assembly, customisation, design, maintenance, repair, storage, and value-adding. Further, many do not involve physical goods at all, but are trading services: customer support, graphic design, sales, software, and training”.*

- 3.22 The Council highlights the importance that new industrial employment activities that “service the services” have, particularly in their relationship with the Capital’s Central Activities Zone<sup>17</sup>, which lies to the north and north west of Lewisham. The Council notes that the Greater London Authority has placed a heightened emphasis upon ensuring that the Capital’s Central Activities Zone is sufficiently supported, through the plan-making

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<sup>15</sup> The Council highlights that railway arch employment sites are characteristic of this part of the Borough, and this part of London to the southeast of London Bridge Station. Such railway arch sites are typically re-purposed for industrial employment uses. These have historically included light manufacturing uses but are now also inclusive of the evolved industrial activities referenced in the Lewisham Industrial Employment Land Report 2023.

<sup>16</sup> Network Rail are using the site for open storage of materials being use for network improvements being carried across South London. These improvements are anticipated to last until at least 2027. The Council highlights that there are other notable network improvements, including the Bakerloo Line Extension, that could benefit from being serviced by materials stored at the Bermondsey Dive Under.

<sup>17</sup> As identified through London Plan Policy SD 04 The Central Activities Zone.

process, by provision of appropriate industrial employment land. The evidence demonstrates that the accommodation available across the Strategic Industrial Locations and Locally Significant Industrial Sites will provide opportunities for these types of uses, such as final-mile distribution, small-scale manufacturing, food production and other creative-industry support services.

- 3.23 In conclusion, the Study states that many of the activities being undertaken in modern industrial premises involve a blend of production, storage, office, creative and sales space, which do not fit neatly into the traditional Use Classes. This is reflective of the modern approach towards employment uses, which incorporates the spectrum of economic activity now possible Class E. The Council considers that the new Lewisham Local Plan reflects this in its planning policies and site allocations. This is particularly the case in respect of Locally Significant Industrial Sites, which genuinely provide opportunities for these new industrial activities.
- 3.24 The Study also speaks to the opportunities and potential for industrial intensification across Lewisham. This seeks to respond positively to very specific comments made by the Greater London Authority and may correspond with possible modifications to the new Local Plan that clarify where these opportunities could be considered.
- 3.25 Finally, the Study sets out a possible approach to monitoring the performance of employment land delivery. Again, this seeks to respond positively to comments raised by the Greater London Authority. The Council intend to use this as the basis of modifications that will be proposed to the examination.

#### **4. Managing Employment Land**

- 4.1 This section of the Background Paper provides an overview of how the new Lewisham Local Plan seeks to manage industrial employment land provision. It seeks to directly respond to the Mayor of London’s opinion on general conformity with the London Plan.
- 4.2 The Council acknowledges that the Greater London Authority originally identified two reasons why, in the Mayor’s opinion, the new Local Plan may not be in general conformity. These reasons were the apparent absence of sufficient evidence to support and justify the new Local Plan’s approach to meeting future demand for industrial employment land; and the consequential approach towards redesignating three historic Strategic Industrial Location sites as new Locally Significant Industrial Sites; and providing replacement Strategic Industrial Location provision through the Bermondsey Dive Under site allocation. The above section of the Paper demonstrates how the plan-making process has been informed by a sound evidence base, and the following will show how that has been applied to provide a sound approach to managing employment land provision, which is also consistent with the London Plan.
- 4.3 Lewisham has an established employment land hierarchy that seeks to safeguard supply to meet the needs of commercial and industrial uses. The hierarchy comprises London Plan designated Strategic Industrial Locations along with different types of locally designated sites, including Locally Significant Industrial Sites, Mixed-use Employment Locations, and non-designated employment sites<sup>18</sup>.
- 4.4 The new Lewisham Local Plan sets out the strategic approach to industrial land management in Lewisham. It provides details as to how the Borough’s future needs for industrial capacity and space will be met. Informed by the Lewisham Employment Land Study, the Local Plan seeks to facilitate the reconfiguration of the Borough’s industrial land portfolio along with the intensification and diversification of uses within it.
- Policy EC2 Protecting Employment Land and Delivering New Workspace
- 4.5 The new Lewisham Local Plan Policy EC 02 identifies<sup>19</sup> a Borough-wide employment land hierarchy under which it seeks to protect appropriate Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses. The Background Paper addresses the subsequent employment hierarchy policies below.
- 4.6 The policy provides a forecast of employment floorspace need until 2038. This is based on the Lewisham Employment Land Study (CAG Consultants/ Aspinall Verdi March 2019 – EB 26). The Council determined to expand the scope of the forecast to correspond with the broader range, inclusive of industrial activity, of employment opportunities that could be delivered through the new Use Class E category. This allows for opportunities to deliver appropriate new industrial use led developments<sup>20</sup> as part of mixed-use schemes regenerating sites through co-location.

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<sup>18</sup> The Paper highlights that the Borough’s non-designated employment sites can demonstrably be shown to provide both strategic and local industrial employment provision.

<sup>19</sup> See new Lewisham Local Plan Figure 8.1.

<sup>20</sup> See Lewisham Industrial Employment Land Report 2023 (EB 22) Chapter 4 Addressing Local Need Section 4.1 Industrial Workshop Needs

- 4.7 The policy seeks to retain, enhance, and intensify industrial employment uses upon designated Strategic Industrial Locations and Locally Significant Industrial Sites. It seeks to bring historic industrial sites, identified through the Mixed-use Employment Land designation back into use with modern facilities that cater for the needs arising across the Borough. The policy seeks to ensure that there is no net loss of viable industrial capacity. This approach is entirely consistent with the London Plan.
- 4.8 The Council acknowledges that the Greater London Authority, acting on behalf of the Mayor of London, expressed an opinion upon general conformity in relation to the new Local Plan's approach to managing industrial employment land. Within the context of Policy EC 02, this related to the apparent absence of sufficient evidence to support and justify the new Local Plan's approach to meeting future demand for industrial employment land. In order to address their concern, the Council, and the Greater London Authority (as part of their on-going discussion) agreed that additional supplementary evidence be prepared to assess the continued validity of the forecasting data, and whether the situation had substantially changed since 2019<sup>21</sup>. That evidence is set out under Lewisham Industrial Employment Land Report 2023 (EB 22). The Background Paper speaks to this matter in detail above. The Council has agreed a position with the Greater London Authority and is not proposing any modifications to this policy.
- 4.9 Continuing with the Greater London Authority's comments, the Council acknowledges that the new Local Plan identifies a forecast need for 21,800 sqm of net additional employment floorspace in the Borough up to 2038. This is consistent and prepared in parallel to the requirement that local plan-makers should identify a supply of specific, deliverable housing sites for five years following the intended date of adoption, and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period<sup>22</sup>.
- 4.10 Whilst national planning policy guidance is clear and explicit on matters relating to housing land supply, it is less so on employment land. Equally, the London Plan does not set out an explicit prescriptive requirement for local plan-makers to break down the forecast need for additional employment floorspace by Use Class. The Council acknowledges that there is a reference in the London Plan<sup>23</sup> for the provision of a sufficient supply of business space of different types, uses and sizes, but this does not constitute a requirement for disaggregating need by Use Class.
- 4.11 Furthermore, the Council highlights that the industrial employment market across Inner London is evolving in alignment with the opportunities coming forward with the changes in Use Class definition. This matter is addressed as part of the narrative for the Lewisham Industrial Employment Land Report 2023 (see above). Consequently, this suggested approach may no longer be meaningful. Nevertheless, the Council is prepared to introduce a proportionate monitoring regime that ensures that the place-making envisaged through the new Local Plan delivers upon its employment objectives, and specifically does not result in any loss in industrial employment capacity. This is covered within the Lewisham Industrial Employment Land Report 2023. This position has been verbally agreed with Greater London Authority Officers, during the course of

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<sup>21</sup> As suggested by the strategic assessment of industrial employment land across the London provided by the London Industrial Land Supply Study 2020.

<sup>22</sup> NPPF Paragraph 69.

<sup>23</sup> London Plan Paragraph 6.2.1.



the discussions on general conformity, it is hoped that it will form part of the forthcoming Statement of Common Ground with the Council.

#### Policy EC 05 Strategic Industrial Locations

- 4.12 The London Plan identifies that Strategic Industrial Locations are critical to London's economy because they can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. London Plan Policy E5 Strategic Industrial Locations<sup>24</sup> requires that they are proactively managed through the plan-making process so that they are maintained as places where industrial, logistics and related uses can be concentrated to support the Capital's economy.
- 4.13 In Lewisham, previous local plans/ development plan documents<sup>25</sup> have identified and sought to proactively manage the Borough's Strategic Industrial Locations. The new Lewisham Local Plan seeks to continue this approach through its Policy EC 05.
- 4.14 The Borough contains two Strategic Industrial Locations at Surrey Canal Road and Bromley Road. The new Local Plan identifies these under its Figure 8.1: Employment land hierarchy.
- 4.15 The new Lewisham Local Plan identifies new Strategic Industrial Location provision under its Policy LNA SA 08 Bermondsey Dive Under – with part of the site also identified for new Locally Significant Industrial Site provision. The new provision has been progressed through the plan-making process. This is set out under Lewisham Site Allocations Background Paper 2023 (EB 15). The Greater London Authority has supported and promoted the allocation of the site. The allocation was considered by the Lewisham Industrial Employment Land Report 2023, which is considered in detail above.
- 4.16 It forms part of a wider grouping of industrial employment sites that straddle the Borough boundary with Southwark, which are either enclosed or immediately adjacent to the aforementioned Bermondsey Dive Under. The site allocation is in active use as strategic industrial employment land as defined by London Plan Policy E4.<sup>26</sup> The Greater London Authority appear to have suggested that the site, as a Strategic Industrial Location, should meet all of the policy's site requirements<sup>27</sup>. The Council contends that there are few, if any active strategic industrial locations that meet all of these requirements. The Council is preparing further supplementary evidence that will confirm its appropriateness, deliverability and developability as a Strategic Industrial Location. The designation and allocation of the site is supported by Network Rail, who have been engaged throughout the plan-making process.

#### Policy EC 06 Locally Significant Industrial Sites

- 4.17 The London Plan, under its Policy E6 Locally Significant Industrial Sites, states that London boroughs should identify locations that have particular local importance for industrial and related functions through their plan-making activities. These are intended

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<sup>24</sup> The London Plan identifies Strategic Industrial Locations under its Table 6.1 and 6.2.

<sup>25</sup> For clarity, the previous iteration of the Borough Local Plan was comprised of a suite of documents inclusive of a Core Strategy and Development Management Plan.

<sup>26</sup> Specifically, the requirements set out under Policy E4 A 2) and 5) – with the sustainable travel function being understood to be associated with the construction and maintenance of said infrastructure networks.

<sup>27</sup> These are set out under London Plan Policy E4 A 1) – 10).

to compliment uses within Strategic Industrial Locations. This is an established approach that has been carried over from the previous iteration of the London Plan. For clarity, whilst the London Plan policies refer to Locally Significant Industrial Sites, the policy does not explicitly exclude the application, within this context, of other alternatively titled local designations.

- 4.18 Within Lewisham, previous local plans/ development plan documents have identified and sought to proactively manage the Borough’s locally important industrial uses and spaces. The new Lewisham Local Plan seeks to continue this approach through its Policy EC6 Locally Significant Industrial Sites.
- 4.19 Previously the Lewisham Core Strategy protected and managed these sites through its Policy 3 Strategic Industrial Locations and Local Employment Locations. Within this policy the Council applied a local nomenclature. Regardless of this fact the designations were consistent with the requirement within the London Plan policy approach protecting Local Employment Locations for a range of uses within the B Use Class (B1, B8 and where appropriate B2 industry) and also appropriate sui generis uses, to support the functioning of the local economy. It is clear that Local Employment Locations, although under a different name<sup>28</sup>, are entirely analogous with the terminology used by the London Plan.
- 4.20 The Council highlights this factual position to clarify an error made in a recent Section 78 appeal<sup>29</sup>, where the Inspector incorrectly stated that -
- “...the London Plan does not refer to LELs as an employment designation, and instead employment land designations are Locally Significant Industrial Estates (LSIS) as set out in policy E6, and Strategic Industrial Locations (SIL). The appeal site is not within either of these designations”.*
- 4.21 For further clarification, the Greater London Authority has consistently supported the Council in respect of its local plan-making approach towards Locally Significant Industrial Sites – both in respect of the previous Core Strategy and the new Lewisham Local Plan.
- 4.22 Sequentially, the new Lewisham Local Plan rolls-forward the places identified through the previous Core Strategy, alongside new places that qualify for designation. Whilst the new Local Plan policy approach applies the Locally Significant Industrial Site title, the objectives – to protect these places for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and related Sui Generis uses, with priority being given to office and light industrial uses – remain as per the Core Strategy. The key evolution<sup>30</sup> being that the policy incorporate the opportunities provided through Class E (g).
- 4.23 The places designated as Locally Significant Industrial Sites are identified under new Local Plan Policy EC 02 Protecting employment land and delivering new workspace Table 8.1 Lewisham’s Employment Land Hierarchy. Further detail is provided for the following places under their relevant site allocations –

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<sup>28</sup> The Council notes that this position is similar to how the term SINC, is interchangeably translated to either Sites of Importance for Nature Conservation, or Sites of Nature Conservation Interest.

<sup>29</sup> APP/C5690/W/23/3321935 21-57 Willow Way, Upper Sydenham, Forest Hill, London, SE26 4QP

<sup>30</sup> The Council highlights that the latest London Plan was prepared in advance of changes to the Use Class Order that introduced Class E.

- a. Apollo Business Centre – LNA SA 06
- b. Blackheath Hill – LEA SA 02
- c. Clyde Vale – LWA SA 07
- d. Evelyn Court – LNA SA 03
- e. Lower Creekside – LNA SA 17
- f. Perry Vale – LWA SA 06
- g. Stanton Square – LSA SA 04
- h. Trundley’s Road – LNA SA 05
- i. Willow Way – LWA SA 09
- j. Worsley Bridge Road – LSA SA 06

- 4.24 The Council highlights that not all of the designated Locally Significant Industrial Sites have corresponding site allocations<sup>31</sup> in the new Local Plan. This approach was determined to focus on places where a site allocation would facilitate successful co-location or comprehensive development opportunities. Nevertheless, the Council could consider an approach of allocating all of the remaining designated Locally Significant Industrial Sites should that be necessary to make the new Local Plan easier to read. This could be done through the main modifications process.
- 4.25 The new Local Plan also identifies three new Locally Significant Industrial Sites, these being the Apollo Business Centre, Evelyn Court, and Trundley’s Road. These places historically formed part of the wider Surrey Canal Road Strategic Industrial Location. However, evidence<sup>32</sup> demonstrates that with the exception of a small amount of residual activity on Trundley’s Road and temporary use on the Apollo Business Centre, no industrial activity takes place on them. Whilst the Greater London Authority made comments about the redesignation of these places, as part of their response to the Regulation 19 consultation, they now acknowledge that the approach towards these three sites reflects decision-taking and other consents gained through the development process (inclusive of prior approval) and is sound. These have been set out in detail above. They also acknowledge that this approach provides a pragmatic solution for the necessary regeneration of the three sites through industrial employment-led redevelopment. The Council highlights that the redesignation and comprehensive redevelopment of these three sites will not result in a significant loss of industrial employment floorspace or capacity. Indeed, it is noted that the implementation of the scheme on Trundley’s Road will deliver an increase in floorspace and capacity.
- 4.26 Additionally, the new Local Plan identifies a new Locally Significant Industrial Site as part of the Bermondsey Dive Under site allocation<sup>33</sup>. This site is primarily comprised of vacant railway arches. The entire site remains in Network Rail ownership, with the railway arches being leased to a commercial property operator that specialises in sub-letting such spaces. It is contended that this approach is in accordance with London Plan Policy E7 industrial intensification, co-location, and substitution. The Council is preparing supplementary evidence that will demonstrate how such sites, and there are many examples located across South London, meet and delivery demand for industrial employment floorspace.

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<sup>31</sup> It is noted that the list of Locally Significant Industrial Sites identified under Policy EC 06 D is incorrect and will require a minor modification to reflect the factual position.

<sup>32</sup> Lewisham Industrial Employment Land Report 2023 EB 22.

<sup>33</sup> This is under new Local Plan Policy LNA SA 08 Bermondsey Dive Under.

#### Policy EC 07 Mixed-use Employment Locations

- 4.27 Within the Lewisham context, Mixed-use Employment Locations are a local employment land designation that have been brought forward through the plan-making process with the very specific purpose of comprehensively regenerating historic industrial sites<sup>34</sup> to create sustainable and successful place-making comprising a mix of uses. This is in contrast to the Locally Significant Industrial Sites<sup>35</sup>, which seek to protect industrial uses to compliment Strategic Industrial Locations.
- 4.28 Previous local plans/ development plan documents have identified and sought to proactively manage the regeneration of these sites<sup>36</sup>. The new Lewisham Local Plan seeks to continue this approach through its Policy EC7 Mixed-use Employment Locations. Given the size and nature of these sites, and the challenges that these present to comprehensive regeneration, the Council considers that's strategic approach is sound<sup>37</sup>. It is highlighted that the policy seeks to secure regeneration that maximises the amount of Class E(g) office and light industrial uses through site redevelopment, provides a demonstrable and significant uplift in the number of jobs, and makes provision for high quality workspace. This further compliments the sustainable and successful place-making objectives sought through the new Local Plan's approach towards Strategic Industrial Locations and Locally Significant Industrial Sites.
- 4.29 Whilst the London Plan makes no reference to other forms of locally identified industrial employment land designated outside of those that specifically compliment the Strategic Industrial Locations, neither does it state that such approaches, particularly in respect of regenerating sites, is unacceptable. The Council highlights that the Greater London Authority has consistently supported the approach towards these sites through their Mixed-use Employment Location designation; both through plan-making and decision-taking processes. Additionally, the Greater London Authority is actively working with the Council in providing grant funding to help deliver schemes such as the comprehensive redevelopment of the Surrey Canal Triangle. The Greater London Authority has not raised this matter as either an issue of general conformity or of soundness.
- 4.30 The places designated as Mixed-use Employment Locations are identified under new Local Plan Policy EC 02 Protecting employment land and delivering new workspace Table 8.1 Lewisham's Employment Land Hierarchy. Further detail is provided for the following places under their relevant site allocations –
- a. Convoys Wharf Mixed-use Employment Location – Policy LNA SA 01
  - b. Deptford Landings Mixed-use Employment Location (formerly known as Oxestalls Road) and Scott House – Policy LNA SA 02
  - c. Neptune Wharf Mixed-use Employment Location – LNA SA 04
  - d. Surrey Canal Triangle Mixed-use Employment Location – LNA SA 09
  - e. Sun Wharf Mixed-use Employment Location (including Network Rail Arches) – LNA SA 18
  - f. Creekside Village East, Thanet Wharf Mixed-use Employment Location – LNA SA 19

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<sup>34</sup> For example, this includes the Convoys' Wharf site (Policy LNA SA 01), which has been vacant and unused for decades.

<sup>35</sup> Some designated Locally Significant Industrial Sites also seek to facilitate industrial employment led regeneration in concert with co-location. These are identified through the site allocations.

<sup>36</sup> Lewisham Core Strategy Policy 4 Mixed-use Employment Locations.

<sup>37</sup> Within the spirit of National Planning Policy Framework Paragraph 22.

4.31 It is noted that the Childers Street / Arklow Road Mixed-use Employment Location has already been completed with some extensions and roof extensions. Also, that Blackhorse Road, which forms part of the wider Neptune Wharf Mixed-use Employment Location, is under construction for 199 residential units; 1,973 m<sup>2</sup> of non-residential floorspace, comprising 1,874 m<sup>2</sup> of flexible B1/A1/A2 office space and 99 m<sup>2</sup> of café /bike repair shop uses<sup>38</sup>. The Council contends that Mixed-use Employment Locations are a demonstrably sound mechanism for securing successful and sustainable regeneration on these historic industrial sites, whilst at the same time securing the restoration of a meaningful level of industrial employment activity.

## 5. General Conformity with the London Plan

5.1 The London Plan provides the strategic planning context for the Capital. It sets out an approach for London's future that seeks to secure what it defines as good growth<sup>39</sup> – namely, growth that is socially and economically inclusive and environmentally sustainable. This underpins the whole of the London Plan. It has been fundamental in guiding the evolution of the new Local Plan's Spatial Strategy, site allocations and planning policies.

5.2 The London Plan also sets out the approaches for the scale and nature of growth, and its supporting strategic infrastructure being distributed across the Capital to the constituent London boroughs, who hold the responsibility for local plan-making. The preparation of new Lewisham Local Plan has sought to ensure that the evolution of its spatial strategy, site allocations and planning policies is consistent and alignment with the London Plan.

5.3 Throughout the plan-making process the Council and the Greater London Authority have maintained an ongoing dialogue on the strategic matters that are relevant to Lewisham. The Council regularly discusses strategic matters affecting Lewisham and the wider Greater London area. This is demonstrated through the Duty to Cooperate Statement (PD 08).

5.4 As a key requirement of the plan-making process<sup>40</sup>, for London Boroughs, the Council made a request under section 24(4)(a) of the Act to the Mayor of London for an opinion on the general conformity of the new Lewisham Local Plan with the London Plan. This request was submitted in accordance with the Regulations on the date of publication<sup>41</sup>, on 1 March 2023. The Mayor's response to the Council was sent on 24 April 2023 as a component of the comments made on his behalf by the Greater London Authority.

5.5 The Mayor of London has offered guidance and broad support for the new Local Plan through his representations made at Regulation 19 stage. The Council acknowledges the positive engagement undertaken with the Mayor and his Officers during the previous Regulation 18 stage which informed the content of the submitted new Lewisham Local Plan.

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<sup>38</sup> Lewisham Industrial Employment Land Report 2023 EB 22.

<sup>39</sup> London Plan Chapter 1 Planning London's Future - Good Growth

<sup>40</sup> Under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 21 Conformity with the London Plan

<sup>41</sup> Under the Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 19 Publication of a local plan

5.6 Nevertheless, the Council acknowledges that the Mayor has expressed an opinion that the new Lewisham Local Plan may not be in general conformity with the London Plan for two very specific reasons relating to the management of industrial employment land. This opinion has been subject to considerable discussion between the Council and the Greater London Authority, with an objective of understanding the true nature of the Mayor's concerns and the specific actions required to secure an opinion that the new Lewisham Local Plan conforms with the London Plan. The outcomes of these discussions is addressed by the Background Paper in the sections above.

5.7 To this objective, the Council and the Greater London Authority are in the process of preparing a Statement of Common Ground that will provide an overview of the discussions and actions undertaken since the publication of the Mayor's original opinion and the subsequent agreement arrived at between the two partners. The Statement will address the other key strategic matters that the two partners are engaged in through their shared plan-making and decision-taking responsibilities.

## **6. Conclusions**

6.1 In conclusion, the Council considers that the new Local Plan has a justified and effective approach towards meeting its objectives for employment land provision, as a component of successful and sustainable place-making, during the plan-period and beyond. This approach is consistent with national planning policy and is now agreed to be in general conformity with the London (subject to the formal signing of the Statement of Common Ground between the Council and Greater London Authority).

6.2 The Council considers that the further supplementary technical evidence has clarified that the Borough's industrial employment land situation is as planned-for, and that capacity and supply are in reality in a healthier position than that hinted at by high-level data<sup>42</sup>. The introduction of monitoring regime will ensure that shared objectives continue to be met through both parties' plan-making and decision-taking responsibilities. The Council concludes that these actions should logically resolve the Greater London Authority's concerns.

6.3 The approach towards the Borough's employment land hierarchy continues to be in accordance with the London Plan – with the new Local Plan taking an approach that is a clear and seamless evolution of that established and proven through previous plan-making. It is highlighted that contrary to a recent opinion the previously identified Local Employment Locations are indivisible from Locally Significant Industrial Sites – both sharing the objectives of securing industrial employment uses that compliment uses within Strategic Industrial Locations.

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<sup>42</sup> This is a specific reference to the London Industrial Land Supply Study 2020, which by the authors own admission is strategic and subject to significant caveats.

6.4 The redesignation of three places as Locally Significant Industrial Locations is justified and reflects the factual position of decision-taking and other consents gained through the development process (inclusive of prior approval) and is accordingly sound. Conversely, the Bermondsey Dive Under, as an already functioning strategic industrial employment site, will positively contribute towards the Borough's Strategic Industrial Locations.