



# **New Southwark Plan BACKGROUND PAPER**

**Industrial land  
December 2019**

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## 1. Glossary terms

<b>Local PIL</b>	The current name for adopted locally designated preferred industrial locations
<b>Strategic SIL</b>	The current name for adopted strategically designated preferred industrial locations
<b>SPIL</b>	The proposed new name for strategic SIL. Strategic Protected Industrial Land.
<b>LSIS</b>	The proposed new name for local PIL to match new London Plan definition. Locally Significant Industrial Site.
<b>Industrial co-location</b>	Providing new homes alongside industrial activities in mixed use development. This may include industrial buildings underneath or adjacent to new homes.
<b>Industrial intensification</b>	This could include the intensification of sites to achieve co-location with residential uses, or intensification of industrial uses only to make more effective use of land including consolidating car parking, yards or providing stacked industrial uses.
<b>Industrial substitution</b>	Removing Strategic Industrial Land from one local authority area and accommodating growth of Strategic Industrial Land in another. Collaboration is required between planning authorities to accommodate London's industrial capacity to locations in the wider region where there is mutual advantage.

## 2. Introduction

1. This background paper justifies the council's approach to industrial land. It includes particular reference to NSP Policy P28 (Strategic Protected Industrial Land), Policy P29 (Office and business development), Policy P32 (Business Relocation) Policy P33 (Railway Arches). The paper draws on the policy requirements of the NPPF, the adopted and draft New London Plan and the evidence base which underpins the New Southwark Plan. It also explains the council's approach to co-location and intensification in the Old Kent Road Opportunity Area which is where much of the strategic industrial land is currently located.
2. The paper considers how these policies have evolved through consultation over the last 5 years and seeks to address some of the remaining main objections that may arise in the Examination in Public. A separate paper on Offices and other employment development has been prepared to support the overall justification for the economy policies in the New Southwark Plan.

### 3. Executive Summary

3. The policy approach to managing industrial land in Southwark is fully in accordance with the approach of national and regional economic policy and informed by a robust evidence base prepared with specific reference to the economy in Southwark.
4. The existing London Plan identifies Southwark as a 'limited transfer borough' (of industrial land) and designates the boroughs main reservoir of designated industrial land, the Old Kent Road, as an Opportunity Area with significant potential for growth.
5. The draft New London Plan provides a detailed and bespoke approach to industrial land, promoting the co-location of industry with new homes where designated SIL is proposed for consolidation and intensification. The draft New London Plan identifies Southwark as 'retain capacity' borough with an aim to achieve no net loss of industrial floorspace overall.
6. The evidence base supporting the London Plan contains monitoring benchmarks which should be used as a starting point for local level employment studies. In Southwark, traditional manufacturing has declined however a new wave of industrial growth has arisen particularly from last mile distribution and servicing needs to the Central Activities Zone.
7. The New Southwark Plan proposes that 50ha of designated industrial land should remain, with specific sites designated as SPIL or LSIS. The current total is 80ha of strategic or locally designated industrial land. However, as this paper sets out, the borough takes a plan-led approach to the consolidation of industrial land to mixed use co-location, particularly in the Old Kent Road opportunity area, its two newly designated district town centres, and the potential for the Bakerloo Line extension.
8. The NSP and draft Old Kent AAP is supported by a number of studies, examples, architectural design guidance and policy requirements to achieve this ambitious aim. Planning policy in the NSP has been strengthened, to provide further protection of non-designated industrial sites and require re-provision of employment space that meets specific local demands. Additionally the NSP provides the policy support to existing and start-up businesses, through a bespoke Business Relocation policy and Affordable Workspace policy.

9. This paper demonstrates the thorough consideration of the borough's approach to industrial land policies and how it will achieve no net loss of industrial floorspace. The comparison of existing and proposed floorspace through masterplanning in the Old Kent Road shows there will be an overall net gain of 32,000sqm of non-residential floorspace including 6,600sqm net gain of employment floorspace. This paper also demonstrates that in practice, the approach of dealing with planning applications in this area thus far has resulted in a net gain of industrial floorspace (4,500sqm).
10. Overall the approach to industrial land management as part of the NSP is considered to be justified, effective, in accordance with national policy and positively prepared.

#### **4. Policy context overview**

##### **4.1. National**

11. The NPPF places significant weight on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development.<sup>1</sup>
12. The economic objective to build a strong, competitive economy is one of the three strands of achieving sustainable development, which goes to the heart of the planning system.<sup>2</sup>
13. Planning policies are required to set out a clear economic vision which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration. The NPPF also required policies to recognise and address the specific locational requirements of different sectors including clusters or networks of knowledge and data-driven, creative or high technology industries and for storage and distribution operators at a variety of scales and in suitably accessible locations.<sup>3</sup>
14. The Government's UK Industrial Strategy (2017) sets out a vision to lead the way in achieving four Grand Challenges including clean growth and drive productivity improvements across the UK.

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<sup>1</sup> NPPF (2019) paragraph 80

<sup>2</sup> NPPF (2019) paragraph 8

<sup>3</sup> NPPF (2019) paragraph 81 and 82

## **4.2. Regional**

15. The London Plan was adopted in 2016 and is the current only remaining regional strategy in the UK and is relevant for planning in Southwark. The draft New London Plan is due to be adopted in early 2020 and includes a new suite of policies paving the way for a new, innovative approach to industrial land in London. This includes the principles of co-location, substitution and intensification including the potential for a local plan-led process of consolidation of industrial land and mixed use development of purpose built industrial workspaces alongside new homes. Policies have shifted to seek to retain more industrial capacity than previous iterations of the plan and seek to achieve an overall net loss of industrial capacity across London as a general principle.

## **4.3. Local**

16. Southwark has positively responded to the New London Plan context including the preparation of an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road. The area is designated as an opportunity area in the London Plan with the potential for significant growth including new tube stations as part of the Bakerloo Line extension. Much of the Old Kent Road contains Southwark's existing supply of strategic industrial land therefore the strategy for achieving the ambitions of the opportunity area are relevant to the industrial land policies in the New Southwark Plan.

## **5. Policy evolution**

17. The following section shows the evolution of the main industrial or related business policies in the New Southwark Plan as a result of 5 years of consultation.

<b>Policy</b>	<b>NSP Options</b>	<b>NSP Preferred Option</b>	<b>NSP Proposed Submission Version</b>	<b>NSP Amended Policies</b>	<b>NSP Submission</b>
<b>P25 P28 Strategic Protected Industrial Land</b>	Policy DM20: Considering the approach to reviewing the PILs in light of preparing the evidence base. Consideration of the change of mixed use neighbourhoods.	Policy DM23: All local and strategic PIL proposed to transition to mixed use neighbourhoods.	Policy P25: Retained SPIL at South Bermondsey and IWMF, OKR Proposed new SPIL at Admiral Hyson Trading Estate.	Deletion of Old Jamaica Road as a site allocation and designated as SPIL  Minor amendment to gasworks/IWMF SPIL boundary.  Proposed Mandela Way, land west of Ossory Road and Hatcham/Ilderton Road as LSIS.	Extended South Bermondsey SPIL to cover railway arches.  Updated reasons in policy P28 to give further clarification on SPIL release/co-location policy.
<b>Policy P26 P29 Office and business development</b>	Policy DM21: Requiring no loss of B class floorspace in the CAZ, opportunity areas, town centres, core action areas, strategic cultural areas. Supporting office growth.	Policy DM24: Retain or increase B class uses in regeneration areas.	Policy P26 as currently drafted.	No proposed changes.	No material changes.
<b>Policy P27 P33 Railway arches</b>	Policy DM22: Support range of uses in railway arches outside the PILs, review arches within PIL review, support walking and cycling routes.	Policy DM25: Support a range of uses in railway arches.	Policy P27 as currently drafted.	No proposed changes.	No material changes.



<b>Policy P38 P32 Business Relocation</b>	No policy.	No policy.	Policy P38 as currently drafted.	No proposed changes.	No material changes. Some wording improvements suggested through consultation.
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## 6. Main representations

18. Representations received to the New Southwark Plan proposed submission version and the amended policies have been published in full in the NSP Consultation Report. Officer comments have been provided on every representation received outlining the responses to each representation and any changes that have been made to address them. This paper does not include the full detail of the representations received as this can be cross referred in the Consultation Report. However to give some context to the content of the paper and how the strategy relating to industrial land is addressed in policy, some of the main representations are summarised below that are considered in the assessment of the soundness of the plan.

- Concern about the loss of industrial land in the borough and no designation of new sites for SIL to make up for the no net loss in the context of the new London Plan and 'retain capacity' borough
- Concern about the policy protection of industrial space for non-designated industrial sites
- Concern there is not sufficient detail on the quantum and type of industrial floorspace to be provided in site allocations
- The need for protection of industrial businesses particularly where they will need to be relocated as a result of redevelopment
- Concern about the level of design detail for mixed use development including servicing requirements for business, internal fit out and design specifications to suit a range of industrial occupiers and the compatibility with residential development
- The need for affordable workspace in the borough for all types of businesses
- The need for operational yards and servicing requirements for industrial businesses

## **7. Justification for approach**

### **7.1. Benchmark land releases and the transition to co-location in SIL**

#### **7.1.1 London Plan 2016 policy and the Mayor's Industry SPG 2012**

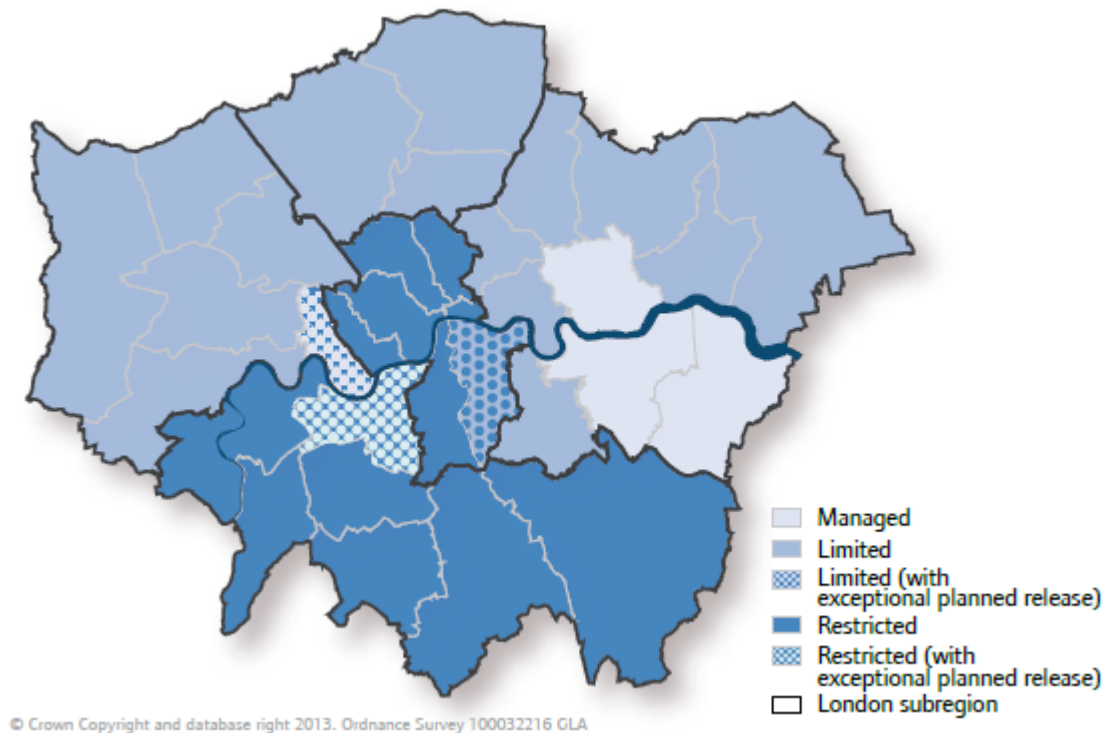
19. The following section details the adopted London Plan 2016 position and the guidance contained within the Land for Industry and Transport SPG (2012).
20. The SPG 2012 provides further guidance to Policy 2.17 (Strategic Industrial Locations) and Policy 4.4 (Managing Industrial Land and Premises) in the adopted London Plan.
21. Policy 2.17 requires boroughs to promote, manage and protect strategic industrial locations as London's main reservoirs of industrial land capacity. It states that development proposals in SILs should be refused unless they are for industrial land uses or they are part of a strategically coordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document.
22. Policy 4.4 requires "a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space."
23. The policy requires local plans to demonstrate how the borough stock of industrial land and premises will be planned and managed, including taking into account to borough level groupings for transfer of industrial land to other uses, the monitoring benchmarks and the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure.
24. Southwark is identified as a limited transfer borough, with exceptional planned release<sup>4</sup>.

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<sup>4</sup> London Plan 2016, Map 4.1, page 153

**Figure 1**

**Map 4.1 Borough level groupings for transfer of industrial land to other uses**



25. The limited category is described in the SPG as an intermediary between the managed and restricted categories of industrial land management<sup>5</sup>. The ‘exceptional planned release’ is not specifically referred in the SPG. However this relates to the identification of the Old Kent Road as an Opportunity Area in the London Plan<sup>6</sup>, which has “significant potential for residential-led development along the Old Kent Road corridor”<sup>7</sup>.

26. The indicative capacities in the London Plan are for a minimum of 2,500 new homes and 1,000 additional jobs. The London Plan states the figures should be explored further and refined in a planning document for the area and through review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or re-provision elsewhere.<sup>8</sup>

27. With respect to limited release, the SPG states:

<sup>5</sup> Mayor’s Land for Industry and Transport SPG (2012), Figure 3.2, pages 36-37

<sup>6</sup> London Plan 2016, Policy 2.13, Map 2.4 (pages 64-66) and Annex 1, page 367

<sup>7</sup> London Plan 2016 Annex 1, page 367

<sup>8</sup> London Plan 2016 Annex 1, page 367

“Taking account of local variations of demand boroughs are encouraged to manage and where possible, reconfigure their portfolios of industrial land, safeguarding the best quality sites and phasing release to reduce vacancy rates for land and premises towards the frictional rates set out in paragraph 3.7.”<sup>9</sup>

28. A reasonable average rate of frictional vacancy in London is described as around 5% of industrial land stock and 8% for floorspace. Maintaining frictional vacancy ensures there is sufficient flexibility in the market to allow time for one occupier moving out of a site and another moving in.<sup>10</sup>

29. The SPG identifies quantified guidance on the borough distribution of monitoring benchmarks<sup>11</sup>. The benchmarks were based on an integrated assessment combining recent strategic research, adopted Core Strategies, Employment Land Reviews and Opportunity Area Planning Frameworks.

“It must be stressed however that the borough level benchmarks in Annex 1 should not be interpreted too prescriptively.”<sup>12</sup>

30. It is recommended these benchmarks are used as a starting point for more detailed local assessments of demand and supply in borough Employment Land Reviews.<sup>13</sup>

31. In Southwark, and as identified in the London Plan, two areas of Strategic Industrial Location are denoted in Southwark; Bermondsey and Surrey Canal area/Old Kent Road (part).<sup>14</sup>

32. Boroughs may also designated locally significant industrial sites which lie outside of the SIL framework. The current designations for local PIL are Parkhouse Street and Mandela Way.

33. The SPG guidance for other industrial sites is that “strategic policy cannot and should not cover individual small sites that are not designated in DPD’s as SIL or LSIS - this must be a borough matter.” However the importance of these sites contributing to London’s industrial requirements is recognised. There must be clear policies in

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<sup>9</sup> Mayor’s Land for Industry and Transport SPG (2012), page 37, point iv

<sup>10</sup> Mayor’s Land for Industry and Transport SPG (2012), page 31, para 3.7

<sup>11</sup> Mayor’s Land for Industry and Transport SPG (2012), Annex 1

<sup>12</sup> Mayor’s Land for Industry and Transport SPG (2012), page 37, para 3.23

<sup>13</sup> Mayor’s Land for Industry and Transport SPG (2012), page 37, para 3.25

<sup>14</sup> London Plan 2016,

DPD's backed by strong evidence in ELR's to ensure a coordinated approach to managing their future.<sup>15</sup>

34. The SPG offers three sets of criteria<sup>16</sup> which consider the management of industrial land and release or retention criteria for site allocations. These have been taken into account when developing the industrial land approach in Southwark. A summary of the criteria is provided below along with an explanation of the plan-led approach taken to managing industrial land in Southwark.
35. Economic criteria – includes whether the site meets long or short term demand for industrial development, whether there could be expansion of industrial businesses, whether it supports strategically important clusters of employment or industrial activity, whether it is viable for industrial uses, whether it meets the demand for waste management, whether it can meet demand for new or emerging industries, whether it is well located in terms of infrastructure.
36. Land use criteria – whether the site is well located to the strategic/local highway network, rail, river or canal network, town centres or CAZ, whether it is part of larger cluster of industrial activity, whether it offers potential for 24 hour working, whether it offers potential for waste or recycling uses, whether it has sufficient space for parking and turning.
37. Demand based criteria – whether the site has been adequately marketed at a price which reflected market value for industrial uses, how long it has been vacant.
38. The industrial land designations have been reviewed in the evidence base supporting the New Southwark Plan which considers these criteria in the context of Southwark's economy. Additionally Policy P29 contains a marketing clause which ensures sites must be rigorously marketed before any employment floorspace is lost. If sites do result in a loss of employment floorspace, a financial contribution is required towards jobs and training.

#### **7.1.2. Draft New London Plan and 'no net loss'**

39. The draft New London Plan introduces a refreshed and detailed set of policies relating to industrial land specifically Policies E4-E7.

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<sup>15</sup> Mayor's Land for Industry and Transport SPG (2012), page 48, para 4.10

<sup>16</sup> Mayor's Land for Industry and Transport SPG (2012), pages 49-51, paras 4.14-4.16

40. Policy E4 (Part A) requires that *‘a sufficient supply of land and premises ... to meet current and future demands for industrial and related functions should be maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution’*.
41. Part B of the policy demonstrates the three categories for industrial land, SIL, LSIS and non-designated sites, which are outlined in Policies E5-E7. Policy E4 Part C requires all three categories to be planned, monitored and managed having regard to the borough level categorisations in Figure 6.1 and Table 6.2. These identify Southwark as a ‘retain capacity’ borough in terms of industrial floorspace.
42. Policy E4 Part C also seeks to ensure that in overall terms across London there should be no net loss of industrial floorspace capacity (and operational yard space capacity) across London within designated SIL and LSIS. Where release of industrial land is proposed in order to achieve wider planning objectives, including the delivery of strategic infrastructure, this should be facilitated by the processes of industrial intensification, co-location and substitution as set out in Policy E7.
43. The supporting text to Policy E4 clearly states **“the principle of no net loss of industrial floorspace capacity applied to overall areas of SIL and LSIS, and not necessarily to individual sites within them”**.<sup>17</sup>
44. Industrial floorspace capacity is defined as “either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater).”<sup>18</sup> The definition also excludes mezzanine space from the calculations of industrial floorspace capacity.<sup>19</sup>
45. The evidence base supporting the draft New London Plan includes the Industrial Land and Demand Study 2017 and the London Industrial Land Supply and Economy Study 2015 which updates some of the evidence in the 2012 SPG. The 2017 report concludes that industrial land release in London as a whole is running well above the benchmark release figure set out in the 2012 SPG. The report suggests intervention in the way industrial land is intensified and managed on a large scale. Southwark has

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<sup>17</sup> Draft New London Plan, para 6.4.5B

<sup>18</sup> Draft New London Plan, para 6.4.5. Footnote 83 describes the 65% plot ratio as ‘total proposed industrial floorspace divided by the total proposed site area’ and this is the default plot ratio assumption for industrial and warehousing sites (CAG, London Employment Sites Database, 2017)

<sup>19</sup> Draft New London Plan, para 6.4.5B

seen a decline in more traditional industrial sectors however its location in the 'Central Services Area' and close proximity to the Central Activity Zone (CAZ) had increased customer proximity for the industrial servicing industries which remain in demand in the borough.

46. Table 13.1 of the 2017<sup>20</sup> report shows that 5.4ha has been released through the development pipeline (source London Development Database (LDD) and 0.1ha through Housing Zone sites, totalling 5.5ha.
47. This information has been sourced from the London Industrial Supply and Economy Study (2015) Tables 2-9 and 2-10.<sup>21</sup> The development pipeline (LDD applications) is described in the caption underneath Table 2-9 as *“land potentially released through Development Pipeline (LDD application) has been calculated on net changes in floorspace which have been converted into hectares using plot ratios. Land potentially released in Areas of Change has been directly identified in hectares through the industrial land dataset. Double counting between the two categories can therefore result in over/under estimation in cases where this occurred.”*
48. The time period for the calculation of the LDD pipeline in the 2015 study is 1 April 2009 to 31 December 2014. The LDD data in the report relates to net changes in industrial floorspace located in industrial land designations and in non-designated sites. The original LDD floorspace figures have then be converted to hectares using plot ratios.
49. Since the adoption of the Southwark Core Strategy in 2011 the areas shown in **Map 2** below have remained adopted strategic and local preferred industrial locations. Adopted policies preclude uses other than industrial in these locations. No major planning applications have been submitted in these areas that involve the loss of industrial uses or introduction of residential uses prior to 2015 (the date of the study).
50. It is likely therefore the 5.4ha release relates to non-designated industrial sites or designated industrial sites which were released prior to the adoption of the current development plan for Southwark which were in the development pipeline between 2009 and 2014.

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<sup>20</sup> London Industrial Land Demand Report (2017), CAG, Table 13.1, page 190

<sup>21</sup> London Industrial Supply and Economy Study (2015), pages 74-75



51. In order to monitor effectively in terms of the release benchmarks, it is considered appropriate to assess this in terms of the policy designations of industrial land, where there are significant strategic clusters through a plan-led approach. Larger non-designated industrial sites are recognised in the NSP or other Area Action Plans and accounted for in terms of managing industrial stock.
52. Southwark has two Housing Zones (Canada Water and Old Kent Road/Peckham) which were designated in 2016 (post-dating the 2015 study). The 2015 study references a small part of the New Bermondsey Housing Zone which falls within Southwark (0.1ha) however is mostly in the adjoining Lewisham borough. This area of Southwark remains designated SPIL.
53. The study intends to give general information about the changes of industrial land stock across London, which is sound to inform the strategic regional approach to industrial land in the draft New London Plan. This background paper includes Southwark's monitoring data of changes to industrial stock through LDD and its approach to both designated and non-designated sites through the plan led approach.
54. The 2017 report allows for some potential release in Southwark as demand arising from logistics activity continues to be met outside of the Central Services area. However there is still need for 'last mile' distribution to the CAZ. Table 13.3 of the 2017 report updates the industrial land release benchmarks for 2016-2041 suggesting a net release of -21.5ha for Southwark. This is slightly below the -25ha suggested release in the previous study for the period 2011-2031.
55. Planned release is exceeding the benchmark demand across London as a whole, however when broken down by sub area the Central sub region (including Southwark) is the only region where release is not exceeding the recommended benchmark (see Table 13.4 below).<sup>22</sup> This suggests the issues with larger scale industrial land release contributing to the strategic loss across London is concentrated in other sub regions of the city.

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<sup>22</sup> London Industrial Land Demand Report (2017), CAG, Table 13.4, page 194

**Figure 2**

**Table 13.4 Comparison of Benchmark Demand and Pipeline Release by Sub Region, (Ha)**

<b>Sub Region</b>	<b>Benchmark Release</b>	<b>Planned Release</b>	<b>Planned - Benchmark</b>
Central	-59.9	-24.0	35.9
East	-246.9	-412.4	-165.4
North	28.3	-75.4	-103.8
South	29.2	-62.6	-91.8
West	16.7	-263.1	-279.8
<b>Property Market Area</b>			
Central Services	-141.8	-93.2	48.6
Lea Valley	29.5	-100.5	-130.0
Park Royal/Heathrow	33.7	-265.6	-299.3
Thames Gateway	-162.8	-317.7	-154.9
Wandle Valley	8.8	-60.4	-69.2
<b>London</b>	<b>-232.6</b>	<b>-837.5</b>	<b>-604.9</b>

Source: CAG, London Industrial Land Supply and Economy Study, GLA (2016)

56. This is also the case when the report considers Southwark borough (-0.1ha planned release, compared to -21.5ha benchmark demand release).<sup>23</sup> However it is acknowledged within the report that further planned release is anticipated as part of the Bakerloo Line growth corridor.<sup>24</sup>

57. The conclusions of the report to readdress the balance across London are the foundation of the new industrial land policies in the draft New London Plan, particularly with reference to industrial intensification, co-location and substitution (Policy E7). In Southwark, these principles have been adhered to in the approach to managing industrial land in the New Southwark Plan.

58. It is clear from the guidance on the Old Kent Road opportunity area contained under Policy SD1, and the proposal to ensure the delivery of strategic infrastructure in the form of the Bakerloo Line extension, that significant change of the nature of the SIL is envisaged in Southwark. To accommodate the ambitions of the draft New London Plan to deliver growth in the number of homes, jobs, transport, open space and social infrastructure it is clear large areas of SIL will need to be released and managed through co-location to accommodate this change.

<sup>23</sup> London Industrial Land Demand Report (2017), CAG, Table 13.5, page 195

<sup>24</sup> London Industrial Land Demand Report (2017), CAG, pages 189, 212

### 7.1.3. The Old Kent Road Opportunity Area

59. The development of the New Southwark Plan has closely followed the development of the draft New London Plan with extensive consultation and discussion with the GLA on the approach to industrial land management in the borough. At the same time significant progress has been made on the development of the Old Kent Road Area Action Plan, of which two drafts have been through extensive rounds of consultation. The AAP responds to the requirement in the London Plan to develop an Opportunity Area Planning Framework. In the draft New London Plan, Policy SD1 seeks to ensure Opportunity Areas fully realise their growth and regeneration potential. This includes supporting and sustaining Strategic Industrial Locations by considering opportunities to intensify and make more efficient uses of land in SIL, in accordance with Policies E4-E7.

60. The Old Kent Road is also a growth corridor benefitting from significant transport infrastructure improvements through the proposal for the Bakerloo Line extension. This will include two new stations within the opportunity area itself, bridging the gap between the Elephant and Castle final Bakerloo Line underground stop to the New Cross Gate and Lewisham overground and national rail lines. Table 2.1 of the draft New London Plan demonstrates the Old Kent Road/Bakerloo Line growth corridor could deliver at least 12,000 new homes and 5,000 new jobs. Over the 20 year plan period of the OKR AAP, it is anticipated the growth could extend to up to 20,000 homes and 10,000 new jobs.

61. The guidance for the Old Kent Road opportunity area of the draft New London Plan includes reference to the last remaining significant areas of SIL that lie in close proximity to the CAZ and the only SILs within Southwark. It states:

“The AAP should plan for no net loss of industrial floorspace capacity and set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing and creative industries should be protected and supported.”<sup>25</sup>

62. Two new district town centres are proposed for the Old Kent Road area in the NSP.

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<sup>25</sup> Draft New London Plan, paragraphs 2.1.14 – 2.1.15

## 7.2. Southwark Evidence Base

63. The NPPF requires local authorities to set an overall strategy and make sufficient provision for employment and other commercial development (paragraph 20). The evidence base for the New Southwark Plan and the New London Plan underpins the approach taken to employment policies and site allocations in the emerging development plan.
64. The Southwark Industrial Land and Warehousing (2014) study identified that the nature of activity within clusters of industrial and warehousing land areas is diversifying. The trend was to see more traditional activities (manufacturing) tending to move out and higher value activities (such as printing and food production) tending to grow, with the result that similar businesses and sectors are clustering together and taking advantage of Southwark's central London location. There is recognition of enabling this new 'industrial sector' to flourish in Southwark and create certainty for developers when carefully considering the allocation of sites.
65. The Employment Land Study (ELS) (2016) study forecasts show Southwark's employment to increase by 84,000 jobs between 2011 and 2036. Whilst much of the new office provision and highest density of jobs will be in the Central Activity Zone (CAZ), the 'CAZ hinterland' serves a significant purpose in meeting the borough's economic needs. The CAZ hinterland typically acts as a service economy to the CAZ and houses 47% of Southwark's working age population and provides 18% of Southwark's jobs. 46.5% of jobs in Southwark are in the 'B-class' space activities, with just 5% of this total being industrial employment and the remainder office type employment activities.
66. Similar to the 2014 study, the ELS 2016 shows the demand for industrial property remains strong, however it notes the market is undergoing significant change. This change is acknowledged as a move away from traditional manufacturing and towards 'industrial service' type activity which supports the central London economy (for example, building services, cleaning, food and printing) and the increased demand for 'hybrid' workspaces (studio or maker spaces with supporting offices). The study notes the deterioration in quality of industrial stock and pressure of demand for other uses, coupled with the risk of businesses being priced out by rising rents.

67. The ELS assessed 36 clusters of employment activity across the borough which provides an economic audit of the nature of activity in Southwark's main employment locations. The recommendations of the ELS have been taken into consideration when preparing the site allocations and employment policies in the New Southwark Plan. Each site allocation has been prepared with an estimate of the type and quantum of employment floorspace existing on the site. Many are required to reprovide the employment uses to meet current market demand in accordance with Policy P29. A further detailed audit was prepared in 2015 for the Old Kent Road Opportunity Area, and this has been recently updated in 2019 by We Made That. This includes all existing floorspace in non-residential uses including industrial and different types of yard space and car parking across the opportunity area and monitors change since the original audit in 2015.
68. The policy recommendations from the 2016 study include opportunities to accommodate mixed use development, helping to provide the right type of space to meet employment needs. Additionally it recommends that the Council plan for the supply and demand for industrial and services that support the CAZ including distribution and logistics. Overall the study projected that the demand for industrial space will decline modestly, particularly due to pressure from residential development and the exceedance of the industrial release benchmarks in the London Plan.
69. The OKR Workspace Demand Study (2019) is one of the most recent pieces of evidence base which is critical in analysing the existing and future drivers of workspace demand and the economy in this part of Southwark. In the Old Kent Road and areas of central Southwark including Peckham and Camberwell (or the CAZ hinterland as coined in the ELR 2016) the nature of demand for employment space is somewhat different from the drivers of demand in the CAZ (predominantly offices).
70. The OKR Workspace Demand Study alongside a range of other evidence base documents emerging from the New London Plan context, promotes the concept of the 'New London Mix'. This acknowledges the changing context for making effective use of land and providing housing, and the ambitious strategy for mixing workspaces that remain in demand alongside residential development.
71. Levels of vacancy in the borough are low, with just 4% office vacancy rate and 1.6% industrial vacancy found in the Old Kent Road Opportunity Area. This is below the

optimal vacancy rate of 8% and means increasing capacity for growth and transience in the market is required.

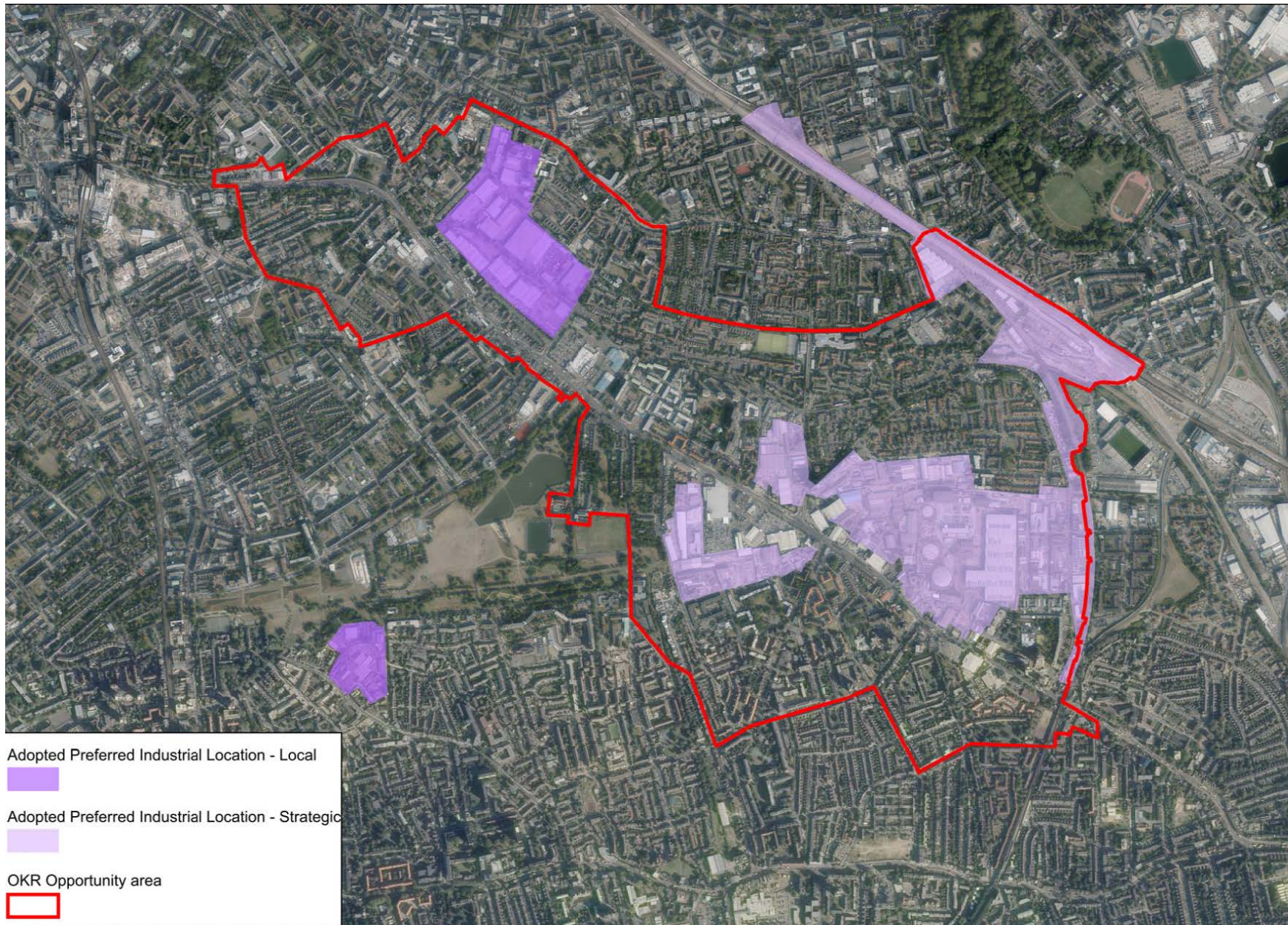
72. The types of employment development that will remain in demand and continue to grow in Southwark's current strategic industrial locations include traditional industrial and logistics uses, light industrial, studio/makerspaces and flexible co-working or hybrid offices.

73. It is vital in terms of Southwark's economy overall to achieve the levels of employment floorspace in redevelopments that will meet the current level of demand.

### **7.3. Proposed changes to industrial land designations**

74. The changes to the industrial designated land approach in Southwark is set out below. The NSP has evolved from its early stages of categorising much of the industrial land as mixed use neighbourhoods, to creating bespoke policies and site allocations relating to workspace demand and the potential for intensification and co-location. Further consultation on additional areas of SPIL and LSIS has occurred throughout the plan process and gone some way to address objections relating to industrial land loss and following the changing context of the draft New London Plan.

**Map 1** – Current adopted strategic and local preferred industrial locations



**Map 2 – Proposed SIL and LSIS in the New Southwark Plan**





**Table 1 – Comparison of existing and proposed designated industrial land**

<b>Sites</b>	<b>Area (ha)</b>
Adopted PIL(strategic)	64.1
Adopted PIL (local)	18.8
<b>Total existing SIL and LSIS</b>	<b>82.9</b>
Total SPIL proposed	32.1
Total LSIS proposed	19.6
<b>Total SIL + LSIS</b>	<b>51.7</b>
Potential additional SIL in Lewisham (joint study on dive-under site)	3-4ha

75. The above Table 1 shows there would be a 31.2ha reduction in industrial land designations in Southwark. However the release of industrial land from a SIL designation does not mean it will no longer serving an industrial purpose.

76. In line with draft New London Plan Policy SD1 and E7, SIL that is proposed for release in the New Southwark Plan will be subject to the requirements of the relevant site allocations and the development management policies in the New Southwark Plan and the Old Kent Road AAP. These policies require full reprovision of employment floorspace (B class). In town centres, and in accordance with the overall economy strategy for the Old Kent Road, commercial floorspace in a range of B class uses, including offices would be acceptable. Industrial uses can also be accommodated in town centres, alongside other community, retail, education, health, sports and office uses. In some of the larger schemes (Malt Street and Ruby Triangle), a successful range of commercial uses including industrial has been accommodated. These sites are located in adopted SIL proposed for release and contribute to the overall provision of industrial workspace across the opportunity area, as well as achieving the aspirations of Policy SD1 by creating a new town centre.

77. In designated LSIS, the site allocations specifically require industrial space to be provided in redevelopment.

#### 7.4. Proposed local policies

78. The New Southwark Plan and the Old Kent Road Area Action Plan contain a strong strategy and policies for the protection of employment floorspace.

##### 7.4.1. SPIL and Policy P28

79. The New Southwark Plan has re-introduced a bespoke SPIL policy which restricts non-industrial uses in a SPIL location, seeks to increase the number of jobs and intensify industrial uses. The approach complies with emerging Policy E5 of the New London Plan which seeks to sustain London's largest concentrations of industrial uses, safeguard the ability of businesses that can operate on a 24 hour basis without being compromised by other uses and to make more efficient use of land.

80. Taking into account the criteria of the 2017 study of the London Plan evidence base above, the following sites are designated as SPIL.

- The Southwark Integrated Waste Management Facility (safeguarded waste site), former gasworks and National Grid electricity sub station (utilities).
- Rotherhithe Business Estate, Bermondsey Industrial Estate and Galleywall Industrial Estate at South Bermondsey. This site functions well as a cluster of business estates with land directly adjacent to the railway line and close to South Bermondsey station. Southwark and Lewisham Council's have commissioned a joint study to explore the opportunities to intensify industrial uses in this location and increase the amount of industrial floorspace the site can accommodate.
- Railway arches along the railway line in Bermondsey, Dockley Road Business Estate and Old Jamaica Road Business Estate. All offer well functioning industrial estates along the railway line.
- Admiral Hyson Industrial Estate. Located near to the cluster of industrial businesses nearer the railway line and operating well as a self-contained industrial estate which is further away from the main growth corridor and new tube stations along the Old Kent Road.

#### 7.4.2. LSIS sites

81. The following three sites have been designated as LSIS following extensive discussions with the GLA and in response to objections about the removal of this designation from the plan. LSIS is identified on the policies map and in the relevant site allocations in the New Southwark Plan. The policy guidance in the site allocations complies with the requirements of emerging Policy E6 in the draft New London Plan which requires the designation and definition of the detailed boundaries of LSIS sites, making clear the types of uses that are acceptable in these locations and the potential for intensification, co-location and substitution.

- Mandela Way (currently a local PIL site)
- Land west of Ossory Road
- Hatcham and Ilderton Road

82. All three are subject to site allocations in the NSP which states that redevelopment of the site must provide industrial uses (B1c or B8 use class). The Old Kent Road AAP will be updated to provide further guidance on the co-location strategy to deliver this with particular reference to industrial uses.

#### 7.4.3. Old Kent Road co-location policies

83. The remaining SIL sites in the borough are located in the Old Kent Road opportunity area. It is not proposed to maintain this designation, as P28 relates specifically to sites in industrial land use only. However Policy E7 in the emerging London Plan, the evidence base supporting the draft London Plan, and the evidence base supporting the NSP and the Old Kent Road AAP has been carefully considered when taking a plan-led approach to the managed release of this area of SIL and proposing co-location.

84. Firstly all development proposals in opportunity areas must retain or increase the amount of employment floorspace on the site (B use class or sui generis employment generating uses). This is a requirement of Policy P29 in the New Southwark Plan. Therefore in strategic policy terms no losses of employment floorspace are permitted across any development proposal in the opportunity area.

85. It is important to plan for the right types of employment space and therefore P29 contains two additional clauses which set the policy direction for effective co-location and responding to demand.
86. Part 1.2 of the policy requires the successful integration of homes and employment space in physical layout and servicing 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. Part 1.3 of the policy requires a marketing strategy to be required for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand.
87. These policy provisions avoid the issue of poorly designed “flexible employment space” being provided in mixed use schemes with no particular sector or occupier in mind.
88. To support this strategic policy approach, the Old Kent Road AAP provides significant guidance on the strategy for employment floorspace (including mixed use industrial) in the opportunity area. The below ‘bow tie’ diagram (**Map 3**) demonstrates the overall strategy, which seeks to accommodate a range of employment types that are in demand and will grow in the opportunity area. The strategy, ‘from laptops to forklifts’ shows the encouragement of the diversity of the economy in this area. This is supported by the provisions of draft Policy AAP6 in the OKR AAP and the latest evidence base, the OKR Workspace Demand Study (2019).

Map 3 – The Bow Tie



89. Each site allocation for the Old Kent Road in the New Southwark Plan that currently accommodates employment floorspace is required to retain or increase the amount. The site allocations in the Old Kent Road AAP provide additional design guidance including the specific types of uses that are required and how they should be mixed with residential development. In terms of protecting employment floorspace for the current SIL, Policy P29, the NSP site allocations, draft Policy AAP6 and the design guidance for sites in the Old Kent Road AAP provide a robust strategy for managed release.

## 7.5. The approach to no net loss

### 7.5.1. Old Kent Road site allocations and masterplan approach

90. As explored above, the principle of no net loss of industrial floorspace capacity is applied strategically and not to individual sites within them. The Old Kent Road opportunity area is made up of 5 sub areas comprising 18 site allocations. Many of the site allocations are very large and contain multiple development sites within them with fragmented land ownership. The masterplan approach in the AAP is consistent with the requirement to plan proactively for the delivery of co-location as a result of SIL consolidation (Part B of draft London Plan Policy E7). The masterplan shows practical solutions to the delivery of strategic infrastructure across multiple land ownerships, for example parks, schools, health services, different types of employment spaces, new homes and a strategy for the height of new buildings. Each sub area has a masterplan study evidence base, which explored the broad capacity for each site allocation. These drew on the requirement for the re-provision of employment floorspace, as well as the requirements for significant areas of new open space, new street layouts, new homes and other social infrastructure.

91. **Appendix 1** shows a comparison of existing and proposed non-residential building floorspace figures for each of the site allocations in the Old Kent Road opportunity area.

92. The evidence base relating to existing floorspace capacity in each of the site allocations by use class and by yard space has been updated with a more robust methodology. This study is the We Made That (WMT) OKR Business Survey (2019).

93. Some of the larger site allocations have been masterplanned and the information about proposed floorspace figures is included in the relevant urban design study for the site (available online as part of the evidence base for the AAP). Some smaller sites have not been masterplanned and assumptions about proposed floorspace is taken either from approved planning applications or assuming the policy position that at least the same amount of commercial floorspace would be expected to be reprovided (either through the employment or town centre policies in the NSP and AAP).
94. It should be noted that whilst masterplan urban design studies can make some assumptions about capacity, this is not based on a fully architecturally designed scheme for the entire site allocation. Therefore there may be some differences between assumed and actual capacity depending on the site specific circumstances and individual planning applications.
95. **Appendix 1** shows that over the whole opportunity area it is planned to have a net increase in non-residential floorspace overall of nearly 32,000sqm (as well as net increases of new homes in mixed use development). This includes over 6,600sqm net new employment space, around 18,000sqm of new retail and 7,000sqm of new community, faith, health, leisure or education floorspace. In the designated LSIS sites, industrial space would be prioritised, and in areas of SIL co-location, industrial uses would be mixed alongside other employment uses where reprovion is required.
96. It should also be noted that the draft London Plan excludes mezzanine space from the definition of industrial floorspace capacity<sup>26</sup>. However the WMT study includes all mezzanine space in existing buildings where known.
97. The draft New London Plan seeks to achieve overall no net loss as a general principle. It defines industrial floorspace capacity as “either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater).”<sup>27</sup>
98. Footnote 83 describes the 65% plot ratio as ‘total proposed industrial floorspace divided by the total proposed site area’ and this is the default plot ratio assumption

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<sup>26</sup> Draft New London Plan, paragraph 6.4.5B

<sup>27</sup> Draft New London Plan, paragraph 6.4.5

for **industrial and warehousing sites**.<sup>28</sup> The purpose is to ensure intensification of industrial and warehousing sites to increase capacity.

99. The plan-led approach in the OKR AAP proposes co-location of residential and industrial uses amongst other town centre and community facilities. Southwark policies require no net loss of employment floorspace overall or an increase.
100. Applying the 65% plot ratio methodology would equate to the industrial floorspace that could be theoretically accommodated if the site was rebuilt for industrial purposes. In a mixed use scheme and to achieve the ambitions of the opportunity area there is a balance needed accommodate other requirements of co-location (residential, other commercial uses, retail, community uses).
101. A 65% plot ratio calculation could be a useful upper threshold for potentially increasing industrial accommodation where possible, however in co-location schemes we consider that applying the no net loss principle to existing industrial floorspace in SIL should be met as a minimum policy requirement.
102. The plan led approach to co-location as demonstrated by **Appendix 1** shows that no net loss can be achieved as a general principle across the opportunity area.

### 7.5.2. Old Kent Road planning applications in industrial designations

103. Whilst the masterplans show an indicative capacity approach it is important to consider the development management policy requirements of individual development sites within these site allocations to consider how the policy can work in practice. **Map 4** below and **Appendix 2** shows planning applications that have been approved (or with a resolution to grant) in SIL in the Old Kent Road Area since 2015 (up until December 2019).
104. **Appendix 2** breaks down the specific existing and proposed use classes relating to each planning application and therefore it is possible to draw analysis of the industrial land provision on these sites. In adopted Local PIL, there has been a net loss of industrial land, however this is due to the single application (Bermondsey Square/Rich Estate) which was granted in 2016 prior to the first draft of the Old Kent Road AAP. In adopted strategic SIL there has been an overall net gain of 6,849sqm

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<sup>28</sup> London Employment Sites Database, CAG, 2017



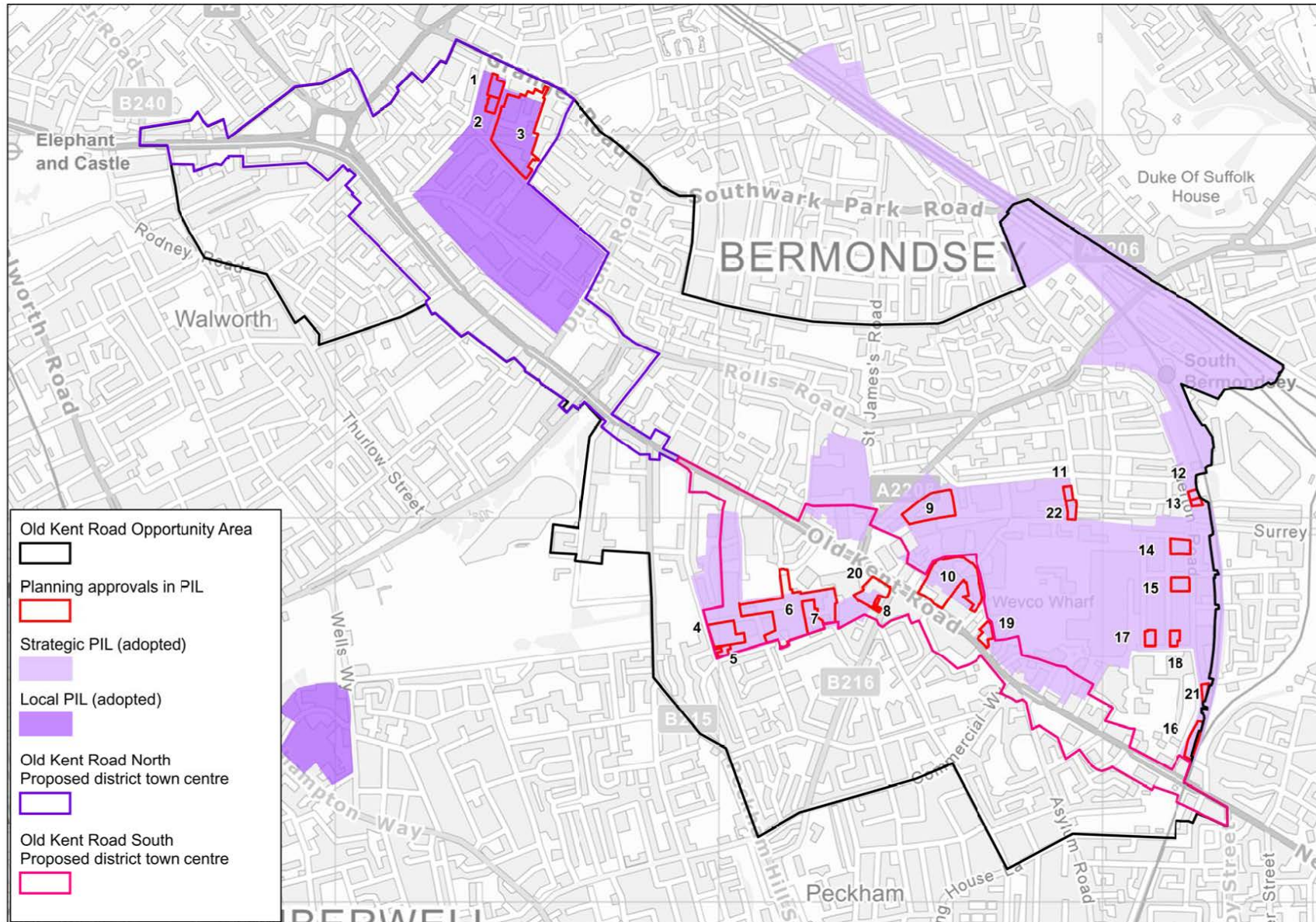
of non-residential floorspace. When considering changes in industrial floorspace only, the sites in SIL have achieved a net gain of 4,483sqm of industrial floorspace.

105. It is therefore considered both the plan-led approach for SIL consolidation is being applied successfully in practice for individual planning applications and both methods result in an overall net increase in industrial floorspace.

106. Sites within town centres have included a range of employment floorspace (e.g. offices) which complies with Policy SD1 in the draft London Plan, Policy P29 in the New Southwark Plan and the site specific guidance and bow tie strategy in the OKR AAP.

107. Many planning applications originally proposed more flexible employment uses however planning conditions securing the B class uses to be fit out to B1c specification have been included. These would attract a number of light industrial, manufacturing, making and creative occupiers.

**Map 4 – Old Kent Road applications in adopted Preferred Industrial Locations (Strategic PIL and Local PIL)**



### 7.5.3. Operational yard space

108. Policy E4 (Part C) of the draft London Plan includes operational yard space capacity within the principle of achieving no net loss of industrial floorspace capacity across London within designated SIL and LSIS. Paragraph 6.4.5AA also states that

*“regard should be given to the characteristics and operational requirements of the different industrial uses... Yard space is an essential requirement for most industrial, logistics and related uses to support servicing, storage and operational needs. Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.”*

109. Policy E7 (Part E1) states that there must be *“appropriate provision of yard space for servicing”*. Part E2 also requires that sites are not compromised by the operational requirements of businesses including 7 day/24 hour access.

110. The WMT study provides an analysis of yard space on all site allocations in the Old Kent Road opportunity area and notes which areas are currently retail or industrial operational yard space, car parking, vacant land or public or private open space. Much of the land within the opportunity area is surface level car parking or large open yards which will be successfully intensified to accommodate mixed use development. Careful consideration is given to servicing and car parking for businesses in individual planning applications to ensure the operational requirements of businesses can be effectively met. This must be balanced with effective design and amenity considerations for residents in mixed use development proposals in terms of servicing times.

111. Transport policy NSP P49 (Highways Impacts) requires on site servicing for large development schemes to avoid servicing and car parking on the public highway where possible. This means that servicing requirements must be effectively designed in to the scheme and within the site boundary. Some sites include goods lifts for multi-stacked industrial uses, minimising the use of columns and ensuring good floor to ceiling heights to ensure ease of access for fork-lift trucks.

112. In South Bermondsey the masterplan (joint with Lewisham) includes intensification of the existing industrial site to include industrial buildings that are

multi-stacked (non-mixed use) potentially incorporating larger goods lifts. The intensification of industrial uses in the retained SIL in this location would ensure the continuation and potential expansion of industrial uses which require more 24 hour servicing or were less compatible with residential development (due to noise, odours, dust or heavy vehicle movements).

## 7.6. Approach to non-designated industrial sites

### 7.6.1. Parkhouse Street

113. The only remaining locally designated preferred industrial site outside of the Old Kent Road is the Burgess Business Park, Parkhouse Street site in Camberwell. The site is proposed to be released from industrial designation and proposed for mixed use development. This was the recommended approach in the various evidence base studies supporting the New Southwark Plan. The site is proposed as site allocation NSP22 and as both the site allocation and Policy P29 stipulate, the retention or increase of employment floorspace of a type which meets current market demand is required. The allocation is made up of several landowners. The largest and most central site to the allocation was recently refused planning permission for failing to deliver the same quantum of employment floorspace in the redevelopment. The application has since been appealed and a decision is awaited from the Secretary of State.

### 7.6.2. Other non-designated industrial sites

114. **Appendix 3** shows the analysis of the net changes of employment floorspace in the borough since 2011 (when the Core Strategy was adopted with the current adopted industrial land designations). The information is from the London Development Database and **Appendix 3** includes an explanation of the interpretation of data from this source. Whilst the borough has seen significant growth in new office floorspace in the CAZ in a number of office-led or mixed use schemes, there has been an overall net loss of employment floorspace since 2011. Some industrial floorspace has been built and some has been replaced by office uses however overall there has been a significant loss of industrial floorspace outside of the

industrial land designations across the borough. This is mainly on smaller sites or industrial estates which have changed in character over time as the South Bank has evolved as part of the Central Activity Zone.

115. Non-designated industrial sites are currently offered no protection in local policy to replace industrial uses unless they fall within the criteria of saved Southwark Plan policy 1.4 or strategic Policy 10 of the Core Strategy. The policies protect business floorspace in the CAZ, town and local centres, strategic cultural areas, action area cores, Camberwell Action Area and on classified roads. Some existing industrial sites do not fall into these categories and therefore are afforded no policy protection to provide any employment or industrial floorspace. The effect of this policy has been that some non-designated industrial (or general employment) sites have been redeveloped without any re-provision.

116. As a result of the evidence base for maintaining and growing a range of employment uses. Policy P29 has extended the requirements of the employment floorspace protection policy to all opportunity areas, town centres, the CAZ and where specified in site allocations. This will give significantly more protection for the retention or re-provision of employment uses across the key areas of the borough. Additionally Policy P32 applies to any small business affected by redevelopment, whether or not the site falls within the policy areas specified by P29.

117. The following sites in **Table 2** are non-designated industrial sites which are also site allocations in the New Southwark Plan. Other site allocations and relevant policies are contained within adopted or emerging Area Action Plans.

**Table 2 – Non designated industrial site allocations in the NSP**

Site	Size (sqm)	Policy designation	Policy requirement
NSP 10 Biscuit Factory	78,900	None	P29 applies  Site allocation specifies: Must support new and replacement business floorspace, including space for small and medium enterprises (B use class).
NSP 11 Tower Workshops	7,344	None	P29 applies  Site allocation specifies: Must provide at least the amount of

			employment floorspace (B use class - suitable for small businesses) currently on the site.
NSP 21 Camberwell station	16,400	Camberwell district town centre	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 24 Valmar Trading Estate	6,021	Camberwell district town centre	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 27 Land between Camberwell Station Road and Warner Road	4,135	Camberwell district town centre	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 29 49 Lomond Grove	3,162	None	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 30 99 Lomond Grove	2,104	None	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 36 Kwik Fit and Gibbs & Dandy, Grove Vale	3,266	None	P29 applies  Site allocation specifies: Must continue to provide a space for employment uses such as builders' merchants.
NSP 38 Railway Rise, East Dulwich	7,849	None	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 40 Goose Green Trading Estate	4,976	None	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 43 63-85 Newington Causeway	3,784	CAZ Elephant and Castle Town	P29 applies  Site allocation specifies:

		Centre Elephant and Castle Opportunity Area	Must provide at least the amount of employment floorspace (B use class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater.
NSP 48 Bath Trading Estate	15,390	None	P29 applies  Site allocation specifies:  Must contribute towards the small business cluster, including creative and cultural industries, providing at least the amount of employment floorspace (B use class) currently on the site.  Must provide space for small businesses (B use class) in the arches of the railway viaduct.
NSP 72 Blackpool Road Business Park	17,580	Peckham and Nunhead Action Area	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 73 Land between the railway arches (East of Rye Lane including railway arches)	20,460	Peckham major town centre Peckham and Nunhead Action Area	P29 applies  Site allocation specifies: Must provide employment floorspace (B Class).
NSP 76 St Olav's Business Park	5,384	Canada Water Opportunity Area	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace (B use class) currently on the site.
NSP 78 Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close	207,000	Canada Water major town centre Canada Water opportunity area	P29 applies  Site allocation specifies: Must provide employment floorspace (B use class).  Site is subject to the Canada Water masterplan application which includes significant growth in employment uses. Harmsworth Quays, the former printworks is subject to a temporary permission for change of use from light industrial (B1c) to an events and entertainment space (D class use).

NSP 79 Croft Street Depot	4,711	None	P29 applies  Site allocation specifies: Must provide at least the amount of employment floorspace currently on the site (B use class) as small business workspace (B1) or a storage depot (B8).
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118. The emerging draft London Plan Policy E7 Part D states that mixed use or residential development proposals on Non-Designated Industrial Sites should be supported where either:

- 1) There is no reasonable prospect of the site being used for industrial purposes; or
- 2) **It has been allocated in an adopted development plan document for residential or mixed-use development;** or
- 3) Industrial, storage or distribution floorspace is provided as part of mixed-use intensification.

119. The council has taken measures to ensure the continuation of business uses on non-designated industrial sites. All currently adopted preferred industrial locations and proposed or adopted site allocations containing industrial land are protected by an Article 4 Direction which restricts the permitted development change of B1c (light industrial uses) to residential. Additionally all railway arches in B1a, B1c or B8 uses benefit from an Article 4 Direction restricting the change of use to residential.

120. Site allocations were selected for sites over 0.25ha which can accommodate new homes and jobs to contribute to strategic targets for the borough. This included the above 17 sites which are now afforded additional protection through Policy P29 and the relevant site allocation policy.

121. Emerging London Plan policy does not require no net loss of industrial floorspace capacity on non-designated sites. However the New Southwark Plan offers stronger protection to ensure no net loss of employment floorspace capacity which meets market demand. In the context of adopted policy, those sites above which are outside town centres or the CAZ would not benefit from a policy requirement to re-provide business floorspace. This would explain an overall net loss of industrial floorspace in the LDD analysis since the adoption of the Core Strategy



as some smaller sites have not benefitted from the policy protection P29 and the site allocations provide.

122. The New Southwark Plan policy approach is stronger than the adopted policies and provides better protection for maintaining a good stock of employment premises. The larger site allocations ensure existing employment sites are intensified for mixed use.

123. The onus is on the developer to demonstrate to the council how development proposals will meet market demand for employment in a specific planning application. However the council benefits from a robust evidence base and knowledge base of workspace demand in different parts of the borough. This is specifically referenced in Policy P30 (affordable workspace), the OKR Workspace Demand Study and the Southwark Affordable Workspace Study. Planning applications are subject to scrutiny on commercial design criteria, provision of affordable workspace and quantum, sector and type of employment floorspace capacity. Further information on workspace demand in the borough, affordability of different types of workspace and design requirements for mixed use development will be contained within a future Commercial and Affordable Workspace SPD.

## **8. Business relocation policy**

124. Due to the scale of change planned for some existing industrial sites in Southwark, the potential for the growth and opportunities of existing and new businesses is an essential consideration. The business relocation policies of both the NSP and the OKR AAP seek to ensure a robust strategy enabling the retention and growth of Southwark businesses across the borough. Providing the quantum and types of floorspace that responds to this demand is essential. This is particularly important in the phasing of developments in central Southwark overall to ensure a range of employment floorspace is available and marketed at different phases of regeneration.

125. Along with the affordable workspace policy, the policy seeks to ensure existing businesses can be accommodated in redevelopment proposals where possible. Some businesses may be able to temporarily relocate and return to the site and this can be secured through Section 106 agreement. Some businesses may not be able to relocate temporarily, and therefore options for permanent relocation will be

explored. Developers will be expected to work positively with businesses to explore opportunities for relocation to suit the viable continuation of the business and any assistance that will be provided.

126. Some industrial businesses will not be suitable to relocate into mixed use development, therefore opportunities to intensify industrial sites such as South Bermondsey (along with Lewisham Council) will help to create new industrial workspaces and increase capacity. The council seeks to match developers to businesses and workspace providers in need of new space, and try to identify new opportunities to ensure businesses can stay operating in the borough and contributing to the wider Southwark economy.

127. Whilst industrial co-location is a relatively new concept, the council continues to work alongside the business community to identify specific operational requirements of different types of business and how this can be accommodated alongside residential development. This includes specific design criteria for mixed use development and ensuring appropriate servicing yards, servicing times, ceiling heights, configuration of spaces and columns, noise insulation and designing out amenity impacts.

128. The Southwark Workspace Provider List is a source of linking workspace providers who are already operating in Southwark or wish to expand into Southwark. This requires a detailed application and screening process. Many of the providers cater for the creative industries and artists studios, showing the increase in demand in these types of industries in the borough. Affordable workspace has been secured for some of these providers in the Old Kent Road opportunity area offering the potential for reprovision, relocation and expansion of the businesses. Additionally the Old Kent Road Business Network has been established to help link businesses looking for new space to developers and understand the requirements and aspirations of businesses in this area.

## **9. Railway arches policy**

129. There are over 800 railway arches in Southwark which have the potential to increase jobs. Policy P33 encourages the use of railway arches for a variety of commercial or community activities including for employment, retail and community uses. Additionally Low Line walking routes are proposed to be created adjacent to

the railway arches so spaces for pedestrians to walk as well as active frontages to generate activity in the arches will be created.

130. Around 100 new arches have been created in South Bermondsey on the 'diveunder' site where the railway tracks have been reconfigured to accommodate the Thameslink upgrade programme. This area falls within the South Bermondsey SPIL and therefore could create capacity for new industrial uses. Any railway arch in a SPIL would be required to provide industrial uses however outside industrial areas other commercial uses are also encouraged to help enliven the arches and Low Line walking routes.

# Appendix 1

Old Kent Road Masterplan approach

Site allocation	EXISTING FLOORSPACE				PROPOSED FLOORSPACE				Overall difference per site	Notes
	TOTAL GIA	Employment (B class)	Retail (A class)	Leisure, community, faith, education and health (D class)	TOTAL GIA	Employment (B class)	Retail (A class) or flexible uses	Leisure, community, faith, education and health (D class or flexible uses)		
					Proposed figures have been converted to GEA (GIA + 5%) to compare with GEA floorspace in We Made That business survey					
<b>OKR1 (NSP53)</b>	<b>Bricklayers Arms flyover</b>				<b>TBC</b>					Site not masterplanned.
<b>OKR2 (NSP54)</b>	<b>7027</b>	6712	0	315	<b>7378</b>	7047	0	331	351	Site not masterplanned. Marshall House scheme built and Bermondsey Square development under construction (existing floorspace excluded from figures). Remaining allocation to meet policy requirement for reprovion.
<b>OKR3 (NSP55)</b>	<b>74355</b>	74355	0	0	<b>53284</b>	49768	370	3147	-21071	Employment floorspace provision potentially to increase with proposals for Tate storage facility to expand
<b>OKR4 (NSP56)</b>	<b>10811</b>	0	10811	0	<b>10650</b>	603	10047	0	-161	
<b>OKR5 (NSP57)</b>	<b>0</b>	0	0	0	<b>0</b>	0	0	0	0	
<b>OKR6 (NSP58)</b>	<b>1392</b>	0	1392	0	<b>1392</b>	0	1392	0	0	Site not masterplanned. Reprovion of retail space required as a minimum.
<b>OKR7 (NSP59)</b>	<b>0</b>	0	0	0	<b>200</b>	0	200	0	200	Former petrol filling station. Application granted for mixed use scheme including 190sqm GIA retail.
<b>OKR8 (NSP60)</b>	<b>0</b>	0	0	0	<b>0</b>	0	0	0	0	
<b>OKR9 (NSP61)</b>	<b>339</b>	339	0	0	<b>339</b>	339	0	0	0	Site not masterplanned. Reprovion of employment space required as a minimum. Existing figures include 101.23sqm GEA car wash (sui generis use)
<b>OKR10 (NSP63)</b>	<b>64830</b>	41234	15639	7956	<b>58585</b>	34401	13805	10378	-6245	Site masterplan includes proposed floorspace for 6x planning applications (Glengall Rd x2, Malt Street, Civic/Livesey, Cantium Retail Park, Nyes Wharf) plus masterplan assumptions for remaining site allocation.
<b>OKR11 (NSP64)</b>	<b>18004</b>	14296	3708	0	<b>18940</b>	15940	3000	0	936	
<b>OKR12 (NSP62)</b>	<b>1577</b>	384	0	1193	<b>803</b>	803	0	0	-774	
<b>OKR13 (NSP65)</b>	<b>67201</b>	56402	6290	4510	<b>76734</b>	41550	19872	15313	9533	
<b>OKR14 (NSP70)</b>	<b>652</b>	652	0	0	<b>286</b>	286	0	0	-366	Site not masterplanned. Floorspace originally Asylum Motors (sui generis). Planning permission granted for 272sqm GIA flexible commercial space and 42 homes.
<b>OKR15 (NSP69)</b>	<b>590</b>	590	0	0	<b>590</b>	295	295	0	0	Site not masterplanned. Reprovion of commercial floorspace required as a minimum. Existing figures include 590sqm GEA Kwik Fit (sui generis use).
<b>OKR16 (NSP67)</b>	<b>48121</b>	39887	636	7599	<b>52427</b>	52427	0	0	4306	
<b>OKR17 (NSP68)</b>	<b>5765</b>	0	5765	0	<b>14386</b>	3872	10514	0	8621	
<b>OKR18 (NSP66)</b>	<b>14069</b>	7559	5724	787	<b>23989</b>	15228	8608	153	9920	
<b>South Bermondsey SPIL</b>	<b>No redevelopment of existing floorspace proposed - net uplift proposed in masterplan</b>				<b>26488</b>	26488			26488	
<b>TOTAL</b>	<b>314733</b>	<b>242410</b>	<b>49965</b>	<b>22360</b>	<b>346471</b>	<b>249047</b>	<b>68103</b>	<b>29322</b>		

<b>OVERALL NET LOSS/GAIN</b>	
<b>Non residential floorspace</b>	<b>31738</b>
<b>Employment (B class floorspace)</b>	<b>6637</b>
<b>Retail (A class floorspace)</b>	<b>18138</b>
<b>Community (D class floorspace)</b>	<b>6962</b>

It should be noted some 'flexible' floorspace in applications may include additional employment floorspace.

## Appendix 2

Old Kent Road Applications in Strategic Industrial Land (up to December 2019)

Map ref	Planning application reference	Location	Site	Status	Existing floorspace overall	Proposed floorspace overall	Net difference overall	Difference in industrial uses only (B1c, B8, B2)	Existing non-residential floorspace type (buildings) by use class	Existing non-residential floorspace GIA sqm (buildings)	Existing yard space GIA sqm (if known)	Proposed non-residential floorspace type (buildings) by use class GIA sqm	Proposed non-residential floorspace (buildings) GIA sqm
1	17/AP/3170	Local PIL	18-19 Crimscott Street	Approved	1350	1835	485	0	B1b	1350		B1a	1385
2	19/AP/1286	Local PIL	20 Crimscott Street (extension)	Approved	1105	1105	0	0	B1c	1105		B1c	1105
3	15/AP/2474	Local PIL	Rich Industrial Estate	Under construction	29309	19468	-9841	-10509	B1a B8 Flexible B1/D1/A1 Flexible A1-A3 Vacant space	5033 4182 10667 0 9427		B1a B8 Flexible B1/D1/A1 Flexible A1-A3	13227 3100 2654 487
<b>TOTAL (Local PIL)</b>							<b>-9356</b>	<b>-10509</b>					
4	17/AP/2952	Strategic SIL	57 Glengall Road	Approved subject to S106	788	750	-38	-38	B1c	788		B1c	750
5	17/AP/4612	Strategic SIL	49-53 Glengall Road	Approved subject to S106	3560	3716	156	156	B1c	3560		Flexible B1c and B2/B8	3716
6	17/AP/2773	Strategic SIL	Malt Street	Approved subject to S106	4188	7362	3174	99	B8 B8/Sui generis	3036 1152	9744 2611	<b>Detailed</b> B1c Mixed use A1-A4,B1,D1,D2 Sui Generis (energy centre) <b>Outline</b> B1c Flexible A1-A4/B1//D2/D1	1137 746 712 3150 1617
7	17/AP/4596	Strategic SIL	Nyes Wharf	Approved subject to S106	757	1193	436	436	B8	757.3	2242.7	B1c	1193
8	18/AP/0564	Strategic SIL	16 Peckham Park Road and 1 Livesey Place	Approved	113	113	0	91	A1 B8	113 0		A1 B8	22 91
9	17/AP/4508	Strategic SIL	6-12 Verney Road	Approved subject to S106	3836	4592	756	756	Mixed use B1	3836.47		B1c	4591.77
10	18/AP/0897	Strategic SIL (partial)	Ruby Triangle	Approved	10408	9896	-512	1364	<b>Inside SIL</b> B8 B1a B2 D1 <b>Outside SIL</b> B1c Vacant Sui generis D1	3022 3505.55 847.4 1564.65 95 847 77 449		<b>Overall</b> B1c B1a A1 A1-A3 Flexible A3-A4 Flexible A1/A3/B1 Cycle hub D1 Church D2 Sports Hall Ancillary commercial Park	5328 118 692 121 400 178 425 1773 861 3972
11	16/AP/5235	Strategic SIL	Varcoe Service Station	Under construction	350	227	-123	-350	B2	350	550	Flexible A1/A2/A3/B1	227.5
12	16/AP/1092	Strategic SIL	171-177 Ilderton Road	Approved	0	338	338	0		0		Flexible B1	338
13	16/AP/2436	Strategic SIL	Atar House, 179 Ilderton Road	Built	374	166	-208	-374	B8/B1a	374		B1	166

Map ref	Planning application reference	Location	Site	Status	Existing floorspace overall	Proposed floorspace overall	Net difference overall	Difference in industrial uses only (B1c, B8, B2)	Existing non-residential floorspace type (buildings) by use class	Existing non-residential floorspace GIA sqm (buildings)	Existing yard space GIA sqm (if known)	Proposed non-residential floorspace type (buildings) by use class GIA sqm	Proposed non-residential floorspace (buildings) GIA sqm
14	17/AP/3757	Strategic SIL	62 Hatcham Road and 134-140 Ilderton Road	Approved subject to S106	1081	1185	104	104	B1c	1081		B1c	1185
15	17/AP/4546	Strategic SIL	180 Ilderton Road	Approved	3328	2351	-977	-977	B1c	3328		B1c	2351
16	17/AP/4819	Strategic SIL	313-349 Ilderton Road	Approved subject to S106	338	1661	1323	1323	B1/B2/Sui Generis	338	1783	B1	1661
17	18/AP/1049	Strategic SIL	78-94 Ormside Street	Approved subject to S106	1697	1778	81	361	B1a/B2	1697		Flexible B1	1778
18	17/AP/4649	Strategic SIL	Iberia House, 2 Hatcham Road	Approved subject to S106	1111	1302	191	191	B1c	1111		B1c	1302
19	18/AP/0196	Strategic SIL	Land bounded by Ruby Street, Murdock Street and 685-695 Old Kent Road	Approved	1600	3411	1811	986	B1 Sui generis D1	305.1 882.1 659.5		B1 A1-A2 D1	2173 87 1151
20	18/AP/3284	Strategic SIL (partial)	596-608 Old Kent Road and Land at Livesey Place	Approved	4222	4322	100	Between 118 and 1040	B1c  A1 D1 B2 and sui generis industrial	1153  413 2656		B1a or B1c B1c A1 D1	922 1271 572 1557
21	18/AP/2761	Strategic SIL	301-303 Ilderton Road	Approved	225	449	224	224		225		B1c	449
22	18/AP/2895	Strategic SIL	2 Varcoe Road	Approved	275	288	13	13	B8	275		B1c	288
<b>TOTAL (Strategic SIL)</b>							<b>6849</b>	<b>4483</b>					



## Appendix 3

London Development Database analysis

## Facts and figures:

### Employment (B class) development (2011/2012 – 2018/2019)

The following tables 1-4 show changes in B1, B2 and B8 floorspace since the adoption of the Core Strategy in 2011.

Use Class B1 is defined as office space (B1a), research and development (B1b) and light industrial (B1c). Use Class B2 is general industrial and Use Class B8 is storage and distribution, as follows:

Class		Land use
B1	B1a	Office space
	B1b	Research and development
	B1c	Light industrial
B2		General industrial
B8		Storage and distribution

The data shows both net and gross data. Net data takes account of any demolished business space on the site of a completed development, and gross data only counts the newly-built floorspace.

The data is also shown in terms of completions and approvals. Completions log the year the developments are completed and approvals log the year the developments were approved.

Both tables will contain some of the same application data but due to length of time some developments take to build, the completions table includes approvals from as early as 2003 for example. The approvals data shows any planning applications that were permitted in any given year and could include schemes that are currently under construction or completed. Planning applications that have expired are excluded from the data. Around 10.5% of applications involving non-residential floorspace have expired over the last 10 years, so there is not a particularly high lapse rate of applications.

## London Development Database

The primary source of the council's development data is the London Development Database (LDD). Although the LDD is owned and managed by the Greater London Authority, it is the responsibility of the borough to input the correct data about planning applications approved within their boundaries.

Boroughs are required to record information about all planning permissions on the LDD which do one of two things. As a result of an approved planning application, this is where there is either:

- a net change in the number or type of residential units on a site, or
- a net change of 1000sqm or more of non-residential floorspace

It is at the discretion of the boroughs to include applications where there are net changes of non-residential floorspace below 1000sqm. Generally data officers at Southwark Council record smaller schemes to provide more effective monitoring data however it may not capture every small site (particularly if no housing was proposed). The data provided below is therefore given in terms of schemes with a threshold of over 1,000sqm (mandatory data) and over 0sqm (including some voluntary data).

It must be caveated that the threshold of over 0sqm figures may not be a wholly accurate reflection of smaller scale changes in non-residential floorspace. Therefore, interpreting LDD data when using smaller amounts of non-residential floorspace should be done with caution.

Use Class B1 is included on LDD and it is possible to record B1a, B1b and B1c uses within this category. The following tables include B1b and B1c data however it must be noted this data is incorporated into the overall B1 figure. For example the data may show an overall net loss in B1c floorspace however on an individual application level it may have been replaced by B1a floorspace.

Prior to 2011 and the adoption of the Core Strategy, some large planning applications significantly changed the function and character of Southwark's Central Activity Zone (CAZ). For example in 2009 the last phase of More London (Tooley Street/riverside) was completed which added over 50,000sqm net increase of office floorspace to the borough. In 2013, the Neo Bankside scheme was completed (permitted in 2006) which changed the Bankside Industrial Estate to a residential/mixed use scheme behind the Tate Modern.

## Completions

### **B1**

As Table 1 and 2 show, from 2011/2012 to 2018/2019 there has been a net loss of around 29,000sqm of B1 floorspace. The majority of the loss of B1 space has been a significant reduction in B1c light industrial floorspace. However the gross increase of over 235,000sqm of B1 space overall has shown growth in B1a offices over this time period. This includes schemes such as The Shard and the News Building at London Bridge and schemes on Blackfriars Road including 20 Blackfriars Road, an 18 storey modern office building.

There have been some B1c uses proposed in gross terms however this does not equalise the overall loss.

### **B2 and B8**

Additionally there has been a loss of approximately 9,500sqm of B2 floorspace and over 60,000sqm of B8 floorspace over this time period. Again the borough has seen some gross provision of B8 and B2 floorspace over this time however this does not equalise the overall loss. For example an extension to the Tate storage facility on Mandela Way approved in 2010 and complete in 2011 proposed a net increase of 6,648sqm of B8 floorspace.

Many older warehouses outside the main industrial locations in the borough have been converted over the years to a variety of uses, including performing arts in Camberwell and residential/mixed use in the Bermondsey Spa regeneration and growth in offices, housing and cultural uses in the Central Activity Zone.

In the 2018/2019 completions, the overall loss of 40,473sqm of B1 space is predominantly made up of the recorded loss of 30,408sqm of office floorspace on One Blackfriars. The planning application was approved in 2012 and completed in 2018 however the original office was demolished in 2003 when the riverside/CAZ location of south London was changing. For example another scheme complete in 2018/2019 (approved in 2014/15) at 128-150 Blackfriars Road included an overall net loss of industrial and office floorspace as at the time the buildings were vacant, in poor condition and marketing did not attract any interest for the space.

## Approvals

### B1

Referring to Table 3 and 4, in terms of approvals a similar pattern is evident, with an overall loss of around 100,000sqm of B1 floorspace, of which 70% is loss of B1c light industrial floorspace. Gross figures show over 360,000sqm of delivery of B1 floorspace (majority offices) with some new B1b and B1c floorspace however this does not equalise the overall loss.

In 2016, the approvals figures show a large loss of B1c floorspace however this is reflective of the temporary change of use of Harmsworth Quays in Canada Water. The site was a former printworks (52,200sqm) and received temporary permission for use as an events and entertainment space. The site is now included in the Canada Water masterplan which proposes a significant uplift in employment space.

### B2 and B8

Around 10,000sqm of B2 floorspace and around 75,000sqm of B8 floorspace has been lost or replaced by other uses. There has been some re-provision of both B2 and B8 uses, for example two sites in the Parkhouse Street PIL approved in 2017 proposed a net increase in B8 and B2 uses (Big Yellow Storage and PHS) however this does not equalise the overall loss.

## Prior approvals and permitted developments

12% of the approvals application data for changes to B1 floorspace were a result of prior approvals and permitted development to change the use of B1a office or B1c light industrial floorspace to residential. This has resulted in -16,502sqm of losses of B1 floorspace over the period 2011/2012 – 2018/2019.

### Article 4 Directions in Southwark

Southwark Council has been proactive in restricting permitted development rights by implementing Article 4 Directions. However national planning guidance states these must be limited to situations where it is necessary to protect local amenity or the wellbeing of the area. As such it is difficult to implement borough wide restrictions on national permitted development rights. Southwark has an Article 4 Direction to restrict any conversions of office space in the Central Activity Zone, which covers the exemption that was previously applied by the General Permitted Development Order but then removed.

Southwark also has Article 4 Directions restricting the conversion of light industrial space in all of its protected industrial land and a number of other industrial estates around the borough, and an Article 4 Direction protecting all railway arches from conversion to residential from employment or other uses. Nevertheless there are still parts of the borough that can benefit from these permitted development rights regardless of planning policy. The council will keep evidence for further Article 4 Directions under review.

**Table 1 - Net and gross completions of schemes involving employment (B class) floorspace exceeding the threshold of 0sqm**

Financial year (1 Apr – 31 Mar)	Net completions					Gross completions				
	Over 0sqm					Over 0sqm				
	Overall B1	of which B1b	of which B1c	B2	B8	Overall B1	of which B1b	of which B1c	B2	B8
FY 2011/12	-8463	0	-5201	0	-10890	7943	0	300	0	11423
FY 2012/13	-10845	0	-1923	-711	-5682	2298	0	0	190	0
FY 2013/14	21869	0	-6931	-3891	-5664	60843	0	0	0	1827
FY 2014/15	33210	-3000	-4141	-114	-5917	73468	0	0	0	0
FY 2015/16	-16924	-1454	-1790	-2432	-6524	37494	446	901	0	338
FY 2016/17	-6110	-1732	-1637	-261	-5958	5848	0	0	0	0
FY 2017/18	-1178	0	166	0	-3270	3734	0	166	0	0
FY 2018/19	-40473	0	-5162	-2257	-18441	43594	0	0	399	399
<b>TOTAL</b>	<b>-28914</b>	<b>-6186</b>	<b>-26619</b>	<b>-9666</b>	<b>-62346</b>	<b>235222</b>	<b>446</b>	<b>1367</b>	<b>589</b>	<b>13987</b>

**Table 2 - Net and gross completions of schemes involving employment (B class) floorspace exceeding the threshold of 1,000sqm**

Financial year (1 Apr – 31 Mar)	Net completions					Gross completions				
	Over 1000sqm					Over 1000sqm				
	Overall B1	of which B1b	of which B1c	B2	B8	Overall B1	of which B1b	of which B1c	B2	B8
FY 2011/12	-4240	0	-4556	0	-4850	5102	0	0	0	11423
FY 2012/13	-9662	0	-1145	-711	-4317	0	0	0	190	0
FY 2013/14	24618	0	-6581	-3891	-5101	59480	0	0	0	1762
FY 2014/15	35970	-3000	-3001	-114	-5050	71538	0	0	0	0
FY 2015/16	-12252	-1900	-2331	-2432	-4208	32169	0	0	0	0
FY 2016/17	-9270	-1368	-1637	-261	-5485	3854	0	0	0	0
FY 2017/18	1876	0	0	0	-3270	2926	0	0	0	0
FY 2018/19	-35668	0	-4792	-2041	-18285	42028	0	0	0	0
<b>TOTAL</b>	<b>-8628</b>	<b>-6268</b>	<b>-24043</b>	<b>-9450</b>	<b>-50566</b>	<b>217097</b>	<b>0</b>	<b>0</b>	<b>190</b>	<b>13185</b>

**Table 3 - Net and gross approvals of schemes involving employment (B class) floorspace exceeding the threshold of 0sqm**

Financial year (1 Apr – 31 Mar)	Net approvals					Gross approvals				
	Over 0sqm					Over 0sqm				
	Overall B1	of which B1b	of which B1c	B2	B8	Overall B1	of which B1b	of which B1c	B2	B8
FY 2011/12	269	-29	-7205	-764	-12711	64490	29	766	0	2100
FY 2012/13	-40144	0	-2331	-916	-3708	1019	0	0	0	0
FY 2013/14	-19599	417	-1023	-346	-32485	63567	417	0	0	3370
FY 2014/15	-31129	-3632	-5244	-1401	-7880	16875	0	135	0	1932
FY 2015/16	-6613	0	-1927	-1167	-6588	26693	0	1073	250	0
FY 2016/17	-18133	2241	-54592	-1153	-3636	82364	2241	3703	146	3307
FY 2017/18	6701	0	-2568	-1717	-4270	45167	0	0	0	0
FY 2018/19	1422	0	-1350	-2427	-3269	63440	579	579	399	4854
<b>TOTAL</b>	<b>-107226</b>	<b>-1003</b>	<b>-76240</b>	<b>-9891</b>	<b>-74547</b>	<b>363615</b>	<b>3266</b>	<b>6256</b>	<b>795</b>	<b>15563</b>

**Table 4 - Net and gross approvals of schemes involving employment (B class) floorspace exceeding the threshold of 1,000 sqm**

Financial year (1 Apr – 31 Mar)	Net approvals					Gross approvals				
	Over 1000sqm					Over 1000sqm				
	Overall B1	of which B1b	of which B1c	B2	B8	Overall B1	of which B1b	of which B1c	B2	B8
FY 2011/12	401	0	-6581	-764	-12670	59342	0	0	0	1762
FY 2012/13	-38195	0	-2331	-916	-3270	0	0	0	0	0
FY 2013/14	-16831	0	0	-346	-29430	60058	0	0	0	3370
FY 2014/15	-20553	-3538	-5379	-1401	-7819	15009	0	0	0	1932
FY 2015/16	-2463	0	-1927	-1167	-5953	25713	0	1073	250	0
FY 2016/17	-14204	2241	-54388	-1153	-3182	63537	2241	1112	146	3100
FY 2017/18	8502	0	-2100	-1717	-4111	22363	0	0	0	0
FY 2018/19	1525	0	-1350	-2571	-1689	2875	0	0	0	4444
<b>TOTAL</b>	<b>-81818</b>	<b>-1297</b>	<b>-74056</b>	<b>-10035</b>	<b>-68124</b>	<b>248897</b>	<b>2241</b>	<b>2185</b>	<b>396</b>	<b>14608</b>