

Chapter 6 - Economy

Overall comments:

There is still a lack of understanding of what happens on the ground for the vast part of London's economy. There are major omissions – for example no policies on high streets or the main arterials which they compose. Overall, the understanding of London's economy, particularly at local level is still very fragmented –spatially, in terms of the relationships between sectors and activities and finally in terms of building typologies which meet the requirements of local actors for adaptable space in useful proximity to other small business.

Policy E1 Offices

The approach to office-to-residential Permitted Development Rights is not sufficient to protect low cost office space - E1 points E and F refer to 'unique agglomerations of world city businesses' (CAZ, Northern Isle of Dogs, Tech City etc), and viable strategic and local clusters (in business parks and town centres). What falls outside these categories (e.g. on parts of high streets not included in town centres) is not recognised. Again, it is important to note that major arterial routes, access to which is used to justify many kinds of development e.g. supermarkets, are often composed of sections of high street. As such, they form a continuum of commercial use that's very adaptable.

Point D – encourages to consolidate and extend where viable office markets in outer and inner London; this needs to be carefully monitored so it does not result in the release of low cost units which are outside business parks and town centres.

Point E – there seems to be a contradiction in the policy, as it encourages the use of Article 4 Directions but also releasing surplus to other uses. This is reinforced in Point G which requires development proposals to support the change of use of surplus office space to housing. The London Office Policy Review indicates that surplus office space contributes to enabling growth and adaptation of businesses. The evidence also shows that SMEs have been most affected by changes of use to residential through Permitted Development Rights. Therefore the policy needs to provide stronger protections to prevent the further loss of low cost office space, particularly outside the CAZ and high value clusters.

Proposed change:

G Development proposals should:

3) support the redevelopment, and intensification of surplus office space to increase the provision of low cost and affordable units

Policy E2 Low-cost business space

Low cost space is defined as secondary and tertiary commercial space – back of town centres and high streets, railway arches, heritage buildings in the CAZ

and small scale provision in industrial locations. However, the policy only refers to B1 business space; it should therefore be extended to B2 and B8, as well as space for other types of activities (e.g. street trading) to include all economic sectors that might operate in these locations. The provision of low cost workspace needs to be included as a separate KPI in the Monitoring chapter.

The replacement/re-provision of existing low cost space is very problematic. This policy needs strategic oversight from the GLA and Boroughs to ensure the assessments and conditions are applied rigorously and meet the needs of existing businesses with minimal negative impacts.

The threshold of 2500sqm in Point C should be reduced to 1000sqm to increase opportunities of providing flexible workspace. 'A proportion' should be defined to enable minimum standards and monitoring. We propose at least 10% or higher if justified by local circumstances. These changes are in line with many Borough Local Plans.

In light of growing interest from all parts of the development industry in multi-use sites & mixed-use, there is surprisingly little commitment to investigating typologies that facilitate mixed use & effective, convenient subdivision. One current tendency is towards tall, flatted structures. Another is towards horizontal and lightweight structures. Both forms prefer separation from nearby buildings. Both types aim at as much internal openness as possible. New development has not met the challenge of providing for subdivision/assembly and division/extension of ownership - in other words, genuine, small-scale flexibility that points to conventional land plotting.

Proposed changes

A The provision, and protection of a range of low-cost work space (defined to include B1, B2 and B8, retail and street trade) should be supported to meet the needs of micro, small and medium-sized enterprises, small branches and other organisations and to support those wishing to start-up or expand.

B Development proposals that involve the loss of existing low cost work space in areas where there is an identified shortage of lower-cost space should:

- 1) demonstrate that there is no reasonable prospect of the site being used for business or other kind of work purposes, or
- 2) ensure that an equivalent amount of low cost work space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses, or
- 3) secure suitable alternative accommodation (in terms of type, specification, use and size) in reasonable proximity to the development proposal and, where existing businesses and other organisations are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new work space floorspace greater than 1000 sqm (gross external area) should consider the scope to provide at least 10% (or higher if justified by local circumstances) flexible workspace suitable for micro, small and medium sized enterprises and small branches etc. Flexibility should include hybrid work space (between use classes), layout, design, fit out and other specification to suit a diverse range of activities

Add new point:

- Boroughs in their Development Plans are encouraged to consider zoning policies for the protection and increased provision of low cost workspace and complementary strategies such as rent control, secure and long terms tenancy etc

Policy E3 Affordable workspace

Affordable workspace is defined as 'maintained below market rates' for specific social, cultural or economic development purposes. The KPI only refers to B1 uses. The definition needs to be expanded – to include other uses; to set a percentage or range of percentages to define 'below market rent'; to specify that the cost should apply to the end users/occupiers, not just the workspace provider; that the workspace will be affordable in perpetuity¹.

Point C - Should be tightened to give guidance to Boroughs on how to assess need; viability should be treated in the same way as for affordable housing i.e. scrutinised by the GLA team

Proposed changes

A In defined circumstances, planning obligations should be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

- 2) dedicated for specific sectors that have cultural value such as Migrant and Ethnic businesses, artists' studios and designer-maker spaces
- 3) dedicated for disadvantaged groups starting up in any sector (including for example, those sharing characteristics protected under Equalities legislation, businesses and trades which have difficulty in securing premises at market rents)
- 5) supporting start-up businesses or regeneration (understood in the broader terms across sectors and activities)

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:

- 1) where there is existing affordable or low cost workspace on-site

¹ See for example Ferm, J; (2014) Delivering affordable workspace: Perspectives of developers and workspace providers in London. **Progress in Planning** , 93 , Article C. [10.1016/j.progress.2013.05.002](https://doi.org/10.1016/j.progress.2013.05.002)

- 2) in areas where cost pressures could lead to the loss of affordable and low cost workspace for micro, small and medium-sized enterprises, small branches, social purpose businesses
- 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.
- 4) On high streets, arterial routes partly composed of high street sections (e.g. A1) industrial estates, office locations identified in E1 and E4
- 5) in locations where affordable workspace is necessary to spread out economic opportunity and fairness and to take advantage of unknown entrepreneurial energies;
- 6) in locations where there have been losses of low cost and affordable workspace.
- 7) where proximity of decent transport, concentrations of young people, some existing and variegated working buildings provide a plausible setting for additional workspace

C Boroughs, in their Development Plans, should consider more detailed affordable workspace policies in light of local evidence of need and viability. Viability should include as a major indicator longevity of business use in a particular location. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage to ensure that the space is configured and managed efficiently. The GLA will also monitor the overall implementation of these policies, as indicated in the Monitoring chapter.

Policy E4 Land for industry, logistics and services to support London's economic function

There is a lack of vision around the opportunities for growth of the industrial and logistics sector (beyond simply servicing London's growth). The title of Policy E4 itself (Land for industry, logistics and services to support London's economic function) suggests a rather unambitious role for industry in London. The London Plan should play a significant role in complementing the forthcoming London Industrial Strategy, particularly in achieving fairness for sectors and activities which are essential to London's everyday economy. We have started developing a community led vision for the Industrial Strategy

which sets out key principles and propositions². For example, the London Industrial Strategy and the London Plan should be aligned in prioritising the protection and increase in capacity of diverse, low cost, suitable workspace, as a driver for fairness, productivity and environmental sustainability. A place-based approach to the London Industrial Strategy should support a fair spatial distribution of diverse workspace in diverse locations and settings across London.

There is a lack of transparency around the calculations for industrial accommodation capacity moving forward. The Plan does not seem to take a similar approach to that for housing. For housing, we look at future demand and backlog in order to identify annual targets. More clarity in the plan on future demand required. There should be annual targets for industrial capacity provision.

The London wide application of the policy is too broad and allows for easy manipulation and double counting. Site based 'nil net loss' policy (with some exceptions) would be stronger and easier to manage/implement/monitor.

Designating individual boroughs as 'retain', 'provide', 'limited release' may not be helpful. Demand for industrial does not follow borough boundaries and providing *any* new industrial land and accommodation is going to be difficult. We should strive for additional capacity wherever we can get it rather than effectively discourage most boroughs from providing new capacity.

Part E talks about the fact that any release of industrial capacity for residential should be in locations that are (or are planned to be) well-connected by public transport. But most of the boroughs/locations where limited release is allowed/proposed (in East London) are in those locations where access by public transport is poor and there is inadequate provision in the pipeline.

Principle of no net loss does not apply to sites previously used for utilities/transport infrastructure (para 6.4.5). These sites might be good sites for other industrial uses. There is a lack of acknowledgement of how hard it is going to be to identify additional capacity for industrial moving forward.

Proposed changes

A 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 maintained. This should make provision for:

Add 10. Building material supply and equipment hire and servicing uses
A large and crucial category, the most notable omission, so worth adding in

² <https://justspacelondon.files.wordpress.com/2018/01/just-space-industrial-strategy-chapter-draft.docx>

Add: Boroughs should carefully audit industrial activity and map industrial accommodation across their area, and in their Development Plans should clarify the planning status of all industrial sites, refining policies maps and introducing designation where appropriate.

An audit and map should be a normal part of plan preparation, but it is not. For the London Plan to require that would be a huge step forward. Clarifying status is the essential job of Development Plans, but most boroughs are not doing this.

Point C The retention and provision of industrial capacity across the three categories of industrial land set out in part B, and in mixed developments elsewhere, should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (measured to include operational yard space capacity) within designated SIL, LSIS and Non-Designated Industrial Sites. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

The *measured to include* part is crucial as yards can be substantial, in some cases the entire site. Provision beyond current industrial areas should be clearly encouraged. Adding in Non-Designated Industrial Sites is a big change, one that is crucial to make a plan that does its job of seeking to meet identified needs. The GLA has produced strong evidence that nil net loss of industrial accommodation is what's required to reduce the damage that constricting supply of accommodation will have on the industrial accommodation.

Point D The retention and provision of additional industrial capacity should be prioritised in locations that:

1. are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
2. provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
3. provide capacity for micro, small and medium-sized enterprises, and small branches.

This should not be prejudiced against small branches of larger businesses.

4. are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

Point D – other locations should be added that acknowledge existing provision, access to local and other supply chains, and are related to local employment (both existing and new jobs)

Point F - Delete 'efficient', or explain how it is defined in terms of meeting needs, supply chains etc

Point G - delete 'where appropriate'

Point H Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs and small branches, in particular where there is a local shortage and demand for such space.

Policy E5 Strategic Industrial Locations (SIL)

The 'main reservoir' phrase is a residue from the days of advocating release of much of the non-SIL industrial land. SIL is only 50% of industrial capacity. Non-designated industrial land which is 36% of industrial capacity occurs in more fine grain urban settings and is at high risk of being lost or released for residential uses. However, the policy should be much stronger in seeking to retain SIL wherever possible. In previous iterations of the London Plan, and in the 2012 SPG, this was clearer, but now it appears that London boroughs are being encouraged proactively to identify the scope for intensification/co-location etc in defining their SIL boundaries. This opens the door for huge loss of SIL. Some industrial land does need to be protected from residential encroachment, purely for operational purposes.

Coordinated masterplanning processes if not integral to Development Plans are a route to unfair planning, frequently done in violation of Gunning principles defining fair consultation.

SIL has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses. The purpose of the tightening of SIL uses in order to increase capacity for industrial to meet demand moving forward is sound. However, it appears that again the driver for this is accommodating as much new residential as possible. There is no consideration given to the overall crisis of accommodation across London for a variety of non-residential uses, where to date SIL and other industrial land has provided relatively affordable and accessible accommodation. It should be noted that SIL often overlap with areas of high deprivation and low income communities. There is an opportunity for SIL to achieve the principles of Lifetime Neighbourhoods and Lifetime Suburbs if they accommodate social rented housing for low income workers, local shopping and affordable amenities and other facilities needed to sustain strong and inclusive communities. Excluding places of worship from SIL is likely to have a significant impact on ethnic minority groups.

B 3) Concern that the drive to make more efficient use of land – and the reference to Opportunity Areas and working with local authorities outside of London can lead to further loss. There is no cross-referencing to Policy SD2 Collaboration in the Wider South East which mentions the scope for substitution of industrial capacity where mutual benefits can be achieved (i.e. move industry outside of London to accommodate housing)

Point E – welcome the Agent of Change principle – the onus is on new residential development near SIL to ensure industrial activities are not affected

Proposed changes

A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

D Development proposals for uses in SILs other than those set out in part C above, should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan. The provision of social rented homes, affordable retail, places of worship, other amenities and functions central to the social and economic sustainability of low income communities will be supported in order to achieve Lifetime Neighbourhoods in close collaboration with existing residents and businesses.

Policy E6 Locally Significant Industrial Sites

Boroughs need to designate land that is not currently designated because it was thought it did not matter (could all be got rid of). The change of strategic policy, to no net loss, now requires fresh designation, not just refining boundaries of already designated land.

Proposed changes

A In their Development Plans, boroughs should:

1. designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies and maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) - *other evidence such as local economic audits should be used to support LSIS boundary designation and understand links to wider local employment, supply chains etc*
2. make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for

SMEs and small branches and distinguish these from local employment areas that can accommodate a wider range of business uses.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

Intensification and consolidation – this needs to be carefully defined; Point B suggests the purpose of intensification is to support the delivery of residential and other uses, but E 1 requires to increase provision of industrial capacity. Welcome that it is a plan driven approach rather than left to individual planning applications. Planning at the SIL/LSIS level will require a solid and fine grain understanding of local business profiles, needs, interactions, links to the neighbourhood and wider area etc.

The aspiration is undermined by the large-scale potential loss of non-designated industrial sites (see above), which tend to anyway be more intermingled with other uses in various urban typologies.

The policy needs to differentiate between intensification (mixed use) and intensification of industrial uses (via multi-storey etc). Presumably the latter could be encouraged on SIL/LSIS but also on Non-Designated Industrial Land, whereas mixed use intensification is presumably not to be encouraged everywhere and would require a plan-led approach. The co-location of industrial and residential won't work in all cases and could undermine the integrity of SIL; the plan needs to be clearer on this.

Point D should be encouraging mixed use over residential, not suggesting that the two are interchangeable. It should also be more prescriptive about the type of uses to be accommodated in 'mixed use' and the priority for industrial uses currently on site to be accommodated on site. Secondly, the wording of this policy is very encouraging to developers and will result in much release of non-designated industrial sites. Point D does not provide sufficient protection to non-designated industrial sites, especially as these are not covered by Policy E4. We are concerned about the differential approach – mixed use/residential is allowed via planning applications in this case, rather than keeping a strategic oversight.

There is no evidence of the *viability and deliverability* of the intensification policy. The Plan requires the development industry to bring forward proposals without providing clear incentives. There will be implications for delivery – e.g. land ownership (for example, small scale ownership better facilitates small scale commercial activity. Land assembly doesn't help this) and other constraints; impacts and costs to existing businesses; management of new spaces.

The policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working. It is not similar to intensification or co-location and only serves to suggest that this is all part of a strategy to

facilitate residential development. Perhaps local authorities outside London who are willing to accommodate more industrial uses should be encouraged to do so in order to provide additional industrial capacity (rather than facilitate substitution). Substitution should also be framed as an issue of regional development i.e. a move to offset London-centric growth: it is not just a matter of releasing land within the London's planning sphere to residential. Spreading industrial activity will bring upskilling benefits and other economic reinforcement to receiving areas.

The participation of businesses in the plan making process and delivery will be crucial – policy needs to identify adequate resourcing for this.

Proposed changes

B (...) This approach should only be considered as part of a plan-led process of SIL intensification and consolidation (with the areas affected clearly defined in Development Plan policies maps) supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

Masterplanning processes should support and feed into Local Plan preparation, as LP preparation has a reasonably fair process (staged consultation, independent inspector etc). Masterplanning process is not an acceptable option, that opens the way to breaches of Gunning principles. Businesses should be asked, involved, consulted.

C (...) This approach should only be considered as part of a plan-led process of LSIS and Non-Designated Industrial Land intensification and consolidation (clearly defined in Development Plan policies maps) or as part of supported by a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, that closely involves relevant businesses, and not through ad hoc planning applications.

Remove Point D to ensure similar protection and support for Non-Designated Industrial Land.

Policy E8 Sector growth opportunities and clusters

This policy should reflect the commitments to economic fairness in the Good Growth policies and A City For All Londoners, beyond the high growth sectors identified in the Economic Development Strategy. Point A should be changed to support businesses and employment across all sectors –not just a diverse range, to mirror the text in 6.8.1. This policy should complement the forthcoming London Industrial Strategy; Just Space has started to develop a

community-led vision³ which places economic fairness and seeking to achieve socio-economic equality at the heart of this strategy.

The focus in the EDS is on advanced urban services, culture and creative industries, financial and business services, life sciences, low carbon, tech, tourism. The policy should recognise relationships and interdependencies across sectors and how these will be supported to increase productivity in low pay occupations, ensure innovation and other benefits are accessed by sectors and activities that are usually ignored etc. The Circular Economy imperative to which the Mayor is committed can only be realised through the interaction of firms.

A significant proportion of start-up business owners are from ethnic minority backgrounds. These businesses often provide important spaces for social interaction, support networks and community cohesion and they play a vital role in giving communities and new arrivals local identity and a sense of place. They foster a spirit of entrepreneurship and are significant local employers who help to address the disproportionate economic and social inequalities facing many ethnic and migrant groups. However, in very many cases regeneration has resulted in the displacement of Ethnic and Migrant Businesses. The same businesses also face insecure tenures and a lack of support from local authorities, coupled with the usual pressures of business readiness, the upkeep of premises, language barriers and having to compete with chain stores.

Point C Rephrase:

The evolution of London's diverse sectors should be supported: the challenge of economic development is that the future is unknown and that the best plan for it is diversity. Boroughs should in Development Plans ensure the availability of suitable workspaces including:

The list should be expanded to include other workspaces mentioned in the previous policies – low cost, industrial, studios etc.

Point E – should include securing apprenticeships and training opportunities through existing higher and further education institutions and through their growth/expansion

Point F – clusters should also include Migrant and Ethnic Business clusters e.g. Elephant and Castle, Seven Sisters etc. Research from Suzanne Hall on superdiverse high streets demonstrates that such clusters are essential in ensuring stability and social resilience in the face of rapid demographic change and local losses of secure blue-collar work.

³ <https://justspacelondon.files.wordpress.com/2018/01/just-space-industrial-strategy-chapter-draft.docx>

Point G – introduces the concept of Strategic Outer London Development Centre with one or more specialist functions of greater than subregional importance. Implementation mechanisms include Local Plans, Opportunity area Planning Frameworks, but also management and investment including Business Improvement Districts. There is a concern regarding the approach to picking specific sectors – without a good and fine grained understanding of local economies, particularly relationships between businesses and the wider neighbourhood. Some Outer London BIDs are located on high streets or in town centres and comprise a mix of different functions, activities, services, amenities; similarly for Industrial BIDs. They require a more holistic and inclusive approach. There is no mention of public participation and scrutiny of these SOLDCs, which is essential to ensure they would meet existing needs.

Policy E9 Retail, markets and hot food takeaways

A policy point should be added to ensure the protection of existing retail and markets in line with previous policies (e.g. offices and industrial land) – particularly in terms of low cost, adaptable, accessible units particularly on and around high streets. There should be a reference to the evidence and recommendations in the *High Streets for All* report commissioned by the GLA. This indicates that around 70% of high streets are under threat because they don't have planning designations. The focus solely on town centres in the policy undermines the contribution and needs of high streets and surrounding spaces.

The policy should include mentions to migrant and ethnic retail, particularly where it refers to 'specialist' shopping, markets etc., in line with suggestions made for Policy E8.

We are concerned about Point C and D on restricting hot food takeaways near schools. For many low income families, particularly those in in-work poverty, takeaways are often the only affordable option for children and young people to have hot meals. The rise of zero-hours contracts and single parents working two or more jobs means children are reliant on cheap, fast food, of a high calorific value. 'Hot food takeaways', covers not only "chicken shops" but probably also applies to kebab shops, fish and chip shops, Chinese, Indian, African and Caribbean take-aways, primarily owned and staffed by minority ethnic traders and a source of food for night time and support service workers. This policy should look at the entire food system in which such shops sit: the supply chains, the alternative employment possibilities, the impact on where the 'school pound' is spent alternatively, the local economies.

If an analysis were to be done of the areas in which 'hot food takeaways' appear at a greater density, compared with the middle class/higher income alternatives such as delicatessens and bakeries and patisseries, charcuteries, tobacconists and wine sellers, it would be fair to make a similar argument in relation to their contribution to poor health outcomes of their main users; but

there seems to be no focus on the lifestyle and health practices of privileged groups in the London Plan.

For many small businesses especially of migrant and ethnic ownership hot food takeaways are a low cost start-up space that enable local enterprise and employment. They should be supported and resourced by the GLA and London Food Board to meet the criteria in the Healthier Catering Commitment. Corporate competition to independent hot food takeaways, particularly chain supermarkets, doesn't usually offer an adequate low cost source of hot food, which reinforces inequalities for the most disadvantaged.

Before this policy is implemented there is a need for careful impact assessment of the implications and opportunities this has for the affected communities.

Proposed changes

Add new points:

- Recognise and protect street and covered markets as a) a source of healthy and cheap food and other goods b) a social benefit c) a source of independent business and local supply d) providing local employment e) an opportunity for start-up businesses. Local authorities should seek to retain control of management and rent-setting and must consult with traders and customers on future proposals. The London Plan should include a database of protected markets.
- Protect clusters of small and independent businesses and ethnic and migrant traders which have a unique and irreplaceable character and assist communities to be resilient in the face of rapid change, particularly in areas undergoing regeneration and growth
- Encourage the start-up of community food hubs which are located in Town Centres which work in partnership with schools and colleges to encourage food based businesses by offering training skills in food growing, marketing and distribution as well as environmental management, managing food waste, and addressing food poverty, providing a variety of skills to encourage localised, self-reliant developments within each borough.
- The number of high street retailers which sell a wide range of fresh foods (grocers, fishmongers, butchers, bakers) should be encouraged by each borough and not include corporate chains which sell fresh food more expensively and therefore less accessibly to low income and precarious earners. A quota of high street premises can be safeguarded for such outlets.

Point C – delete

Point D – Where development proposals involving A5 hot food takeaway uses are permitted, the operator should be supported to achieve, and

operate in compliance with, the Healthier Catering Commitment standard through working in collaboration with the GLA, London Food Board, local authority and other stakeholders.

Policy E10 Visitor infrastructure

Point G – does not ensure a similar accessibility standard as for residential development. This should be changed to reflect the requirements of Policy D5 Accessible housing.

Proposed change:

G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide:

- 1) at least 10 per cent of new bedrooms to be wheelchair-accessible;
- 2) all other rooms to meet the standards for ‘accessible and adaptable dwellings’

Policy E11 Skills and opportunities for all

This policy and its text are, as expected, very narrow – with a focus just on training and hiring obligations in S106 agreements on new developments, especially for construction jobs. The policy should apply more broadly to all employment and business opportunities created through new development, not just construction.

There should be KPIs to monitor the implementation of this policy, particularly the three points that relate to training and apprenticeship completions, take-up of employment opportunities and increasing the proportion of under-represented groups.

The policy should be linked to proposals in the Mayor’s Good Work Standard and Economic Development Strategy related to pay, work conditions, opportunities for job progression. Given the Good Work Standard is the main initiative to implement the Mayor’s economic fairness agenda, this should feature in all economy related policies. The Good Work Standard needs to address the challenges facing businesses and organisations in the low pay sectors, particularly those in the foundational, social economy and charitable sector. The Mayor needs to ensure that its benefits can easily reach those small businesses and organisations which are most in need of rises in productivity, employee equality and wellbeing. In doing so, particular consideration should be given to the challenges facing these businesses in terms of the severe workspace accommodation crisis particularly in high street and industrial estate settings, which is causing increasing rents and displacement of businesses.

Proposed changes:

Add new points:

- the Mayor will support businesses and organisations in the low pay sectors, foundational economy and charitable sector to sustain and create new local employment opportunities across London's neighbourhoods, through ensuring access to low cost and affordable work space and providing dedicated resources for the implementation of the Good Work Standard
- Development proposals in Opportunity Areas, Housing Zones and Mayoral Development Corporations must ensure that new jobs created meet the requirements of the Good Work Standard