

GLA - PLANNING FOR LONDON: Class E Commercial, Business and Service Uses

JUST SPACE RESPONSE 31/12/23

Just Space is a Londonwide network of community groups focused on planning issues. The response below is drawn from a variety of comments made, and is not exhaustive or definitive. A more comprehensive set of proposals is set out in our [Community-Led Plan](#) and [Recovery Plan](#)

1. How should we plan for the range of land use demands for different Class E uses?

London is a collection of villages scattered around its town centres. London's full hierarchy of town centres are often the most critical piece of community benefit. They provide essential local shops and services, are frequently where traditional community uses are located (libraries, leisure centres, GPs, churches etc), and provide local employment and business opportunities; but they are, as a result, important civic spaces where children, teenagers, and older people can hang out safely, and where unstructured care in the community by the community can be accessed. While it is relatively easy to measure the vitality and viability of a centre, there has been as yet no measure of the health, cultural and community benefits town centres bring.

The imperative of the LP must be to protect these centre and this full range of land use demands. The new Class E is a challenge to such protection.

The LP needs to encourage better curation by the boroughs through devising a measure of the health, cultural and community benefits and requiring new development in Class E to contribute to those benefits, and maintaining a standard of community benefit in each centre. A community-led audit of the town centre is the best way of achieving this, and boroughs should be required to commission such audits. Development of such uses outside centres should be discouraged. Balances of E(a), (b) and (c) uses must be maintained.

2. What are the recent trends in Class E floorspace in different parts of London?

Loss of industrial floorspace has been well documented and needs to be reversed. Parts of central and inner London have a shortage of smaller industrial and business space for SMEs; these can often fit seamlessly with retail and should be encouraged in town centres and edge of centres, rather than their loss to housing, which brings bigger financial returns for the landowner.

3. How can we ensure that developments designed for Class E meets a broad range of uses and locations? Are there any particular design requirements associated with any of the Class E uses?

In order to meet the broad range of uses required in town centres, a broad range of units needs to be available, including the smaller units often found in traditional high streets. Such smaller units need to be protected from being amalgamated into larger sites, which pushes out smaller local and independent businesses in favour of chains, who generally require larger premises.

4. How do we retain Class E uses in specific locations? What has been the impact of permitted development rights? How should Article 4 Directions be used?

Article 4 Directions have had some success in protecting the range of uses in town centres, and boroughs should be encouraged to use them. Creating Special Policy Areas for town centres is another helpful tool.

5. Are there any other matters in relation to Class E that need to be considered?

Affordable Workspace

6. What are the range of factors that affect the 'affordability' of workspace for different end users? And how can or should planning policy influence these?

In the CAZ and adjacent areas, the economics of affordable workspace make little sense: 50% discounts are still above, often well above, going rates for workspace across further out in zone 2/ inner London. The whole policy is distorting the market, given that there is huge scope for conversion/reuse of retail space in Inner London, let alone outer London, at rents lower than discounted space in CAZ.

There is also a danger of oversupply – if three major Waterloo office developments were to go ahead they would create 300,000ft² of affordable workspace just in this small area – is there the demand within the criteria of the Mayor's Policy? Even if there is, could it be more sustainably met further out.

Meanwhile, at the edges of the CAZ, such as at the Elephant or Bermondsey, what is de facto affordable workspace for hundreds of local SMEs in small units is being redeveloped into housing and shopping centres with large units, scattering the local SMEs to the winds, forcing them to relocate in Outer London or beyond, thereby reducing employment and opportunities for residents in central and inner London

7. How are boroughs taking forward London Plan Policy E3 in their Local Plans and through planning applications?

Because local authorities are prioritising this policy over others, the policy is distorting the limited amount of money available through s106, particularly taking away from urgent environmental mitigation e.g creating and improving green space in the vicinity of large new office developments. It is in effect a misuse of s106 – how does it actually mitigate the immediate local impact of major office developments, for example?

To give the example of Lambeth's affordable workspace policy and guidance, the implication (and our experience) of the policy is that 10% Affordable Workspace will be sought in all cases if viable; indeed, more will be sought if viability permits. This prejudices what is used as the baseline for the viability assessment. In practice, as far as local stakeholders can interpret from the s106 agreements for Elizabeth House and 76 Upper Ground (major office developments so far consented in South Bank and Waterloo under this policy) the viability of affordable workspace provision has been assessed without full consideration of or consultation on other legitimate mitigation measures which might be considered to be of higher priority in terms of the immediate impact of the development and/or for the social, environmental and economic well-being of the neighbourhood.

The South Bank & Waterloo Neighbourhood Forum has proposed that Lambeth engage in a collaborative process with local residents and businesses through the Forum, in order to reach agreement on a framework of strategic priorities for developer contributions in the

South Bank and Waterloo neighbourhood which would then guide the priority attached to particular elements of South Bank and Waterloo s106 agreements and align them better with local priorities and with environmental and well-being considerations.

The local authority has yet to respond to this proposal for collaboration.

8. Should the policy approach to affordable workspace be more strategic for consistency or as currently determined by the boroughs based on local circumstances?

Yes. Policy is currently being implemented rigidly as a formula. There should be a London wide assessment of demand for affordable workspace, and proper consideration as to where this demand should be met. This approach could be used to regenerate town centres by accumulating a large proportion of the affordable workspace required across a borough at centres currently in decline. Taking the example of Waterloo, even 1-2km away in Kennington Cross or the Oval there is cheaper commercially available office space that 50% discounted in Waterloo.

9. How effectively is London Plan Policy E3 Affordable Workspace operating in practice in terms of implementation? Are there any aspects that need to be refined?

See above