

LBE Response to Inspector's Further Question Regarding SIL (14 August 2013)

It is important to clarify that in matters of SIL, it is only the GLA who has a strategic view of the pan-London context, and therefore boroughs are unable to take forward changes to the strategic industrial land supply at the local level without liaison with the GLA and consideration of the shared evidence base. As set out in ED78, the Council thoroughly reviewed and reflected on the available evidence base to validate the GLA response to the publication DPD, and in doing arrived at the same conclusion having been satisfied that the rationale presented for a SIL designation was justified.

This analysis re-considered both strategic and local assessments of the quantitative and qualitative supply and demand for industrial land (as set out in the published evidence base), with a view to ensuring a balanced industrial land portfolio that reflects the policy hierarchy in relation to industrial land designations set out in the London Plan. Hence it would be incorrect to state that the SIL designation south of the canal has been applied solely to retain a specific quantity of designated industrial land, as this would not reflect the totality of considerations that have informed the reconfiguration of the wider area.

Initially, the Council had proposed that it was unnecessary to apply a SIL designation to the entirety of land south of the canal as part of the consolidation of the wider industrial area which would release the land to the north of the canal from SIL (and the portion of the land south of the canal which was SIL) as the existing land use south of the canal was industrial and the site allocation set out continued industrial use; hence it was considered that there would be no loss of industrial capacity per se.

However, when reviewing the total quantum of release that would have resulted should this proposed approach be taken forward, it became evident that failing to designate the land south of the canal as SIL would result in an unbalanced strategic industrial land portfolio that resulted in a substantial loss of SIL. As can be seen from the analysis in Table 1, failure to designate the land south of the canal as SIL would result in a loss of 12.24ha of SIL borough-wide, meaning that the majority of SIL lost would be in a location that was: identified as SIL in the London Plan; largely recommended for retention as employment land in the borough's ELR; contributing to industrial capacity as set out in the 2010 URS study; and scoring highly against the industrial site retention criteria set out in paragraphs 4.11 to 4.16 of the Mayor's Land for Industry and Transport SPG.

The approach put forward in the Publication DPD therefore did not reflect a rigorous approach to industrial land management nor appropriately take into account the guidance within the London Plan or Land for Industry and Transport SPG; the borough's categorisation as a 'limited transfer' borough; or the approach set out in Policy 1.2(b) of the Development Strategy DPD. Reconfiguration in this manner would have led to a substantial loss of SIL which, according to the policy hierarchy relating to industrial land within the London Plan, is given the highest level of strategic protection. From a pan-London point of view therefore, a SIL designation must be applied to the land south of the canal as part of the wider reconfiguration to ensure that the strategic role of SIL in this area, as well as the existing industrial capacity, is maintained.

Table 1 Change to borough industrial land supply with OIS8 south of canal not designated as SIL

Location/Publication DPD Reference	URS 2010 Reference	Industrial Land Release (ha)	Potential net SIL change (ha)	Potential net LSIS change (ha)	Potential net SIL/LSIS change (ha)
Colonial Drive ACT6	UDP406	-1.00	0.00	-1.00	-1.00
Acton Crossrail Station ACT7 – south of railway	UDP367	-0.90	0.00	0.00	0.00
Southall Crossrail Station SOU4	SIL8.3	-2.38	-2.38	0.00	-2.38
Southall East SOU6	SIL8.2 part	-7.52	-7.52	0.00	-7.52
Johnson Street Southall SOU10	UDP453.2	-2.89	0.00	-2.89	-2.89
Greenford Green OIS8 - north of canal	SIL9.6	-5.00	-9.13	0.00	-9.13
Greenford Green OIS8 - south of canal	3025	0.00	0.00	0.00	0.00
Atlas Road, Park Royal - new SIL		0.00	6.79	0.00	6.79
TOTAL QUANTUM OF RELEASE		-19.69	-12.24	-3.89	-16.13

Table 2 Change to borough industrial land supply with OIS8 south of canal designated as SIL

Location/Publication DPD Reference	URS 2010 Reference	Industrial Land Release (ha)	Potential net SIL change (ha)	Potential net LSIS change (ha)	Potential net SIL/LSIS change (ha)
Colonial Drive ACT6	UDP406	-1.00	0.00	-1.00	-1.00
Acton Crossrail Station ACT7 – south of railway	UDP367	-0.90	0.00	0.00	0.00
Southall Crossrail Station SOU4	SIL8.3	-2.38	-2.38	0.00	-2.38
Southall East SOU6	SIL8.2 part	-7.52	-7.52	0.00	-7.52
Johnson Street Southall SOU10	UDP453.2	-2.89	0.00	-2.89	-2.89
Greenford Green OIS8 - north of canal	SIL9.6	-5.00	-9.13	0.00	-9.13
Greenford Green OIS8 - south of canal	3025	0.00	9.47	0.00	9.47
Atlas Road, Park Royal - new SIL		0.00	6.79	0.00	6.79
TOTAL QUANTUM OF RELEASE		-19.69	-2.77	-3.89	-6.66