

Tell us who you are

Ref: R038

Title

Mr

First name

Andrew

Surname

Sissons

Email address

andrew@andrewsissonsconsulting.com

Agent's details

Are you an agent?

Yes

No

Personal details

Title

Mr

First name

Andrew

Last name

Sissons

Job title (optional)

Organisation (optional)

Address

██████████

Postcode

██████

Telephone

██████████

Email (optional)

andrew@andrewsissonsconsulting.com

Your representation

Please complete this set of questions for each representation you wish to make.

To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

ed2, ed3, ed4

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

refer to my letter

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

refer to my letter

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, do you consider it necessary to participate at the oral part of the examination?

- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

Your representation 2

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

Yes

No

Require further notification

Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination
- The publication of the inspector's recommendations following the independent examination
- The adoption of the Revised Lambeth Local Plan and Policies Map.

Review your answers

Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.

AndrewSissons Consulting

Planning Policy Team,
London Borough of Lambeth
Sent via Email Only

11/03/2020

Dear Sir or Madam,

REGULATION 19 CONSULTATION ON THE DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020

ASC are commercial agents, place makers and development strategists, working across a vast array of schemes in London. Increasingly we are working in Lambeth advising developers and landowners on the commercial components of new schemes and leasing property particularly within KIBA's.

I hope by making this response to the consultation it will provide a different perspective, and as ASC are involved throughout the development process, we will be able to make a small contribution towards ensuring the local plan is affective.

As a business that undertakes almost a third of our business within the industrial and maker sector, we welcome the strong focus on maintaining industrial uses in the Borough - it is critical for Lambeth and for the wider London economy.

However, we feel that certain elements of the revised local plan do need further consideration before they can finally be implemented into policy. The refreshment of the KIBA policy is a once in a generation opportunity to really create fit for purpose business locations and places and dynamic clusters where people and businesses want to locate. Lambeth has an opportunity to become an important location for business in London and with the right policies KIBA's can be steered towards becoming a powerhouse for London's new economy.

Draft Policy:ED2 – Affordable Workspace

Much of the Boroughs affordable workspace policy is sensible and has much more clarity than other London Boroughs. The ability to provide affordable workspace as alternative uses to B1A is helpful and sensible.

The drafting of the policy to enable the landowner to directly offer affordable workspace to the market is welcomed as too often the actual benefit is not passed on to the end user small business and instead is swallowed up by the provider in the middle of the deal.

Our main fear is that the level of affordable workspace and the proposed length of agreement required in certain locations in the Borough will not be viable for many developments. The policy also does not contain suitable flexibility if developers or landowners want to make alternative offers which can often be much more beneficial for end users, for example, see the S106 agreement for Caxton Works in Newham which has enabled businesses to move into spaces well below market rent but for a shorter period of term certain affordable. Whilst such approaches may not suit the Borough or end users in certain cases. It is useful to have a degree of flexibility and the ability to negotiate to ensure that schemes are viable to actually build.

Andrew Sissons Consulting



Draft Policy ED3: Key Industrial and Business Areas (KIBAs)

With regard to paragraph 6.30 it is our view based on many of our client's requirements that industrial occupiers want to be located in a much more diverse location than purely an industrial estate or the new narrow definition of a KIBA. I do find it strange that the Borough's industrial policy section in the Local Plan has been written in such a way, when this is compared to Lambeth Council's own excellent creative and digital strategy report, which is probably the best written and most thoughtful consideration of the modern economy produced by any London borough in recent years. The creative and digital report quite correctly talks extensively about how dynamic business clusters are created, and how this is done through businesses from different backgrounds coming together in shared locations, along with the opportunities this creates and how these businesses want to work in the future. It's a real shame to see such a divergence away from an excellent piece of work.

Our clients actively want to be located in commercial clusters that have a variety of businesses from a range of different sectors, which enables easy access to knowledge transfer, inter disciplinary collaboration and the sharing of ideas and new concepts and the serendipity of fortuitous meetings with likeminded businesses and entrepreneurs. This is much more difficult to achieve in a single tenure industrial estate or KIBA where the businesses are from similar industrial sectors and backgrounds that are across the B class uses such as B1B, B1C, B2 and B8.

It is true that certain businesses in the industrial sector want to be out of the way and free to undertake noisy activities that are not compatible side by side with other forms of tenure or community, such as logistics companies, waste businesses and garages who want space, security and isolation. However, the majority of businesses want to be located in dynamic clusters and in the last decade have actively embraced this way of working.

The fact is that London's industrial landscape is changing and big industrial sheds outside of logistics, waste and storage are rarely required in inner London. Manufacturing is changing as consumers demand change and are seeking craft, bespoke and independent products made locally and in a much more sustainable way, with an identifiable provenance. This translates as requirements starting from 500 sq ft in increments all the way up to 10,000 sq ft. There are bigger requirements and certainly space should be included for units in increments of between 10,000 and approximately 30,000 sq ft in locations where this is feasible. Requirements beyond (apart from logistics and storage) are rare particularly in inner London as these are tending to move outside of the M25 to cheaper locations where larger facilities and better transport links are more feasible.

It is our strong view that if Lambeth's future industrial stock is delivered with this outmoded traditional single tenure approach, it will be at a lost opportunity and will create places that will not be fit for purpose for the dynamic economy that is rapidly emerging in the Borough and across London.

B1A floor space in KIBA's is important and will provide the necessary cross subsidy to deliver high quality industrial product on lower floors and create a greater quantum of commercial space on the upper floors of new schemes, helping to ensure a bigger and stronger business community. It should also be noted that in inner London locations such as Lambeth it is difficult to build industrial buildings at a cost that generates any significant investment return, unless it is cross subsidised with another form of tenure that generates a higher return such as office space or leisure uses.

In certain sites it will not be possible to meet the 65% plot ratio or the full reversion of ground floor space. In these instances, planning departments should quite rightly interrogate the feasibility and viability, but then create the necessary conditions for developers to build something that will be fit for purpose and actually deliverable. It is much more important to deliver a fit for purpose product than meeting an arbitrary plot ratio or reversion quantum that will impact the quality of the end product and the ability to successfully lease spaces in the future. I would argue that shoehorning in



inappropriate industrial floorspace is counterproductive and is actually starting to become an issue in London and the quality of product will almost certainly be reduced as a consequence.

Recommendation 1: To help make B1C products more financially viable and deliverable as new schemes an element of B1A should be allowed within new developments on KIBA's to cross subsidise costs

Recommendation 2: A mixed economy of different business sectors including B1A land use within KIBA's is positive and facilitates quicker and stronger economic growth. The currently policy should be reconsidered to take into account Lambeth's own Creative and Digital Strategy and also wider business opinion to ensure KIBA's do not become single tenure industrial estates.

Recommendation 3: A degree of flexibility around the level of required industrial floor space re-provision and meeting the plot-ratio would benefit schemes and ensure better fit for purpose products.

ED3: Paragraph 6.28

With regard to end occupiers, paragraph 6.28 is still very confusing and when I have sought clarification from policy officers around what constitutes an acceptable end user and what doesn't I am still far from clear despite numerous different conversations. From what I understand from officers, an architect practice is acceptable as B1C because they make models (despite most staff sitting behind desks), but an advertising agency that makes mock-ups of packaging and products is not acceptable. A gaming studio is acceptable, as are a company that uses 3D printing technology, again this is despite the fact that their numerous desk-based staff far outweigh their industrial component. At present this policy remains very confusing and seems very arbitrary and based on officer views, rather than any form of detailed research and the production of a clear process for landowners to follow. At present developers will be very concerned about building out such schemes when it is so unclear as to what kind of end users will be acceptable to the Borough. This really does need further consideration before it becomes policy, as it will affect the length of time that properties are void as developers and end occupiers try to work out whether they are actually able to lease the space. However, on this point I think we are all on the same side and want to provide great commercial space for businesses. I hope that the actual use at the point of delivery is much more flexible.

In recent years that has been a significant blurring between B1A and B1C and it is difficult for us all to keep up with the pace of change in commercial space and how business use it. This needs to be researched and understood much more clearly before long term decisions on land use are made.

Recommendation: To provide the market place with far more clarity around acceptable end users for KIBA land and undertake more detailed research into what the Borough deems to be acceptable occupiers.

Policy ED:3 Key Industrial and Business Areas (KIBAs) Paragraph 6.31

I would argue that paragraph 6.31 is written in a way that will make KIBA's isolated places with poor business infrastructure and facilities and will almost certainly impact on the type of businesses that rent these locations. I refer again to the Lambeth creative and digital strategy – these places will not have great facilities such as restaurants and leisure which is a real shame and demonstrates a lack of understanding of what businesses want from a commercial location. They demand good facilities as part of the offer, and this is a key reason why they will select a business location. For example, a café space is where people meet and connect and create new ideas. The success of mixed-use industrial/maker locations like Hackney Wick maintain significant B1C because of the business culture created outside of the individual's workplace, where businesses can come together to meet and create new opportunities. It is important that restaurants and cafes should not be seen as a hinderance, but instead an important piece of the business infrastructure for a place. This approach will almost take industrial space back to the 1980's with isolated locations that only have a burger van for company! Workers and businesses are now much more discerning and want a better range of facilities and food options.



Recommendation: To enable a level of quality F and B and Café space within KIBA's as a key part of the business infrastructure of an area.

Draft Policy ED4 A: Multi-Level or stacked Industrial

With regard to policy ED4 A - stacked industrial is still a very immature product and even less developed as an investment grade product. At present the concept is not tested in the marketplace outside of the major storage and logistics facilities. I would say that the vast majority of our clients seeking new industrial space are for ground floor industrial space and preferably with an element of yard space. Whilst we support the need for stacked industrial and the requirement to replace industrial floor space, this is often not feasible in certain locations and these types of schemes should be assessed in a much more flexible way.

We also feel a more case by case approach should be applied to certain sites, for example we have been working on the former Costa roastery site on Paradise Street. This site, in its high constrained location with nearby residential, numerous transport and loading issues and a complex configuration, has been particularly difficult to design an industrial/maker scheme. Officers regularly directed the developer to seek a stacked industrial solution on site, which is clearly impossible to deliver. On such locations to ensure good quality maker space on the ground floor and possibly the first floor a level of cross subsidy from a more valuable tenure is critical. In this case a significant amount of office space would make this more viable and deliverable and create a more dynamic work environment, which is much more in keeping with the demands of the local business community.

More research needs to be undertaken on stacked industrial products, particularly for B1C uses, and more realism needs to be displayed by local authorities and the GLA in terms of how complex the product is and how difficult it is to deliver a financially viable scheme that is worth building. It is important to remember that whilst industrial rents are going up, so is the cost of construction and the fit out requirements for this product are expensive. The circulation and shared amenity space within buildings is very high and can account for over 25% of the space, which is neither usable nor lettable. The rent for this type of product is still relatively low in comparison to other tenures and the returns for landowners and developers does not make it a viable product to build. I would also suggest further work is done with potential occupiers to explore if and how this product can work in the future.

Recommendation: Further research is required into stacked industrial concepts before this becomes policy – particularly with the vast majority of B1C / B1B occupiers requiring ground floor space. The current market for the product is immature and the investment grade of the product is even lower. It is important to ensure this becomes more established as a product before it is a requirement.

Yours Sincerely,

Andrew Sissons
Managing Director

Andrew Sissons Consulting

