

**NOTE:** Modifications set out encompass changes agreed following Stage 1 Hearings and further proposed modifications as a result of Stage 2 of the Examination, including those agreed as part of the Council's Statement of Common Ground with the Greater London Authority.

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## Policy 25 – Supporting Economic Growth and Jobs

Opportunities for employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000 sqm of additional employment floorspace across the borough **and protect the borough's SIL capacity** over the plan period by:

- A. Focusing the delivery of new Class E Part G iii, B2 and B8 floorspace in SIL, LSIS, BEA and non-designated employment sites;
- B. Focusing the delivery of Class E Part G i, ii floorspace in BEA and town centres;
- C. Supporting the delivery of a range of employment typologies in suitable locations, across the borough:
  - i. Distribution uses – storage and distribution floorspace (B8), in locations within good proximity of strategic road network;
  - ii. Industrial Space – light industrial (Class E, Part G iii) and the production of goods (B2) in smaller or sub-divided space within the borough's designated employment **industrial** sites; and
  - iii. New London Mix – high density office space (Class E Part G i and ii) ranging from small studio space, flexible co-working spaces to large offices in the designated centres or other locations with access to supporting amenities and services; and
- D. **Promoting industrial intensification through site allocations in LP2, the Industrial Intensification SPD and the subsequent development of industrial masterplans (in line with Policy 30 – Industrial Masterplan Approach and London Plan Policy E7) to facilitate the intensification of industrial capacity, and ensure that the SIL capacity is at a minimum maintained, whilst also delivering an uplift in terms of overall industrial capacity.**

**9.8** In line with the London Plan, the 52,000 sqm additional floorspace is expected to be delivered through intensification and consolidation across existing employment areas. These are the designated employment areas of Strategic Industrial Locations (SIL) and Borough Employment Areas (BEA), in addition to the Locally Significant Industrial Sites which are introduced in this Plan. The Employment Land Audit (2020~~1~~) demonstrates that it is possible to achieve this level of increase. The following policies on the management of SIL, LSIS and BEA, and Non-Designated Employment Land set out how this can be

delivered. Town Centres are also a good location for offices and light industrial uses, as they are well connected and have facilities that workers may want to be close to, as well as possibility of attracting local customers.

**9.9** The Employment Land Study (2019) states that the focus should be on a range of typologies to meet future demand and need. These comprise distribution uses related to logistics, industrious space, and New London Mix. Distribution space will be directed to areas across the borough which have good access to the strategic road network. New London Mix will be supported in BEAs and town centres, and this policy should be read in line with Policy 32 - Workspaces and Policy 33 - Affordable Workspace.

**[NEW PARAGRAPH] To deliver on the objectively assessed economic needs of the plan, development of industrial capacity should be guided to the most suitable locations. The largest identified need for economic purposes is for B8 floorspace to support the logistics and distribution sectors. This need amounts to an additional c. 36,500 sqm of floorspace to be provided.**

**[NP] In Waltham Forest there are two broad areas which contain sites which can best meet these requirements. These areas are illustrated in Figure 9.1. The first is the North Circular Strategic Location, which benefits from connectivity to the A406 North Circular Road, and large, relatively consolidated land ownership. The second is in the south of the borough, around the Lea Bridge and Leyton Strategic Locations, which have excellent strategic road network connectivity provided by the A12 and proximity to Central London. As the most suitable, well-located and sustainable locations for the delivery of new and additional floorspace for distribution and servicing, development proposals should seek to optimise the capacity which these sites present when preparing masterplans and planning applications.**

**[NP] The role of LP2 – Site Allocations will be to establish the capacity which is required to be provided on specific sites, in order to meet the borough’s SIL-type/B8 industrial land needs. The viability and deliverability of industrial supply (to meet additional B8 floorspace and re-provision for any loss) will be ensured through LP2, the Industrial Intensification SPD, and a tailored monitoring arrangement to track progress.**

**[NP] Any development proposals on SIL will be required to ensure that the supply of floorspace which is protected as SIL is maintained and where possible increased. Proposals for masterplans involving the intensification and consolidation of SIL will be required to ensure that the SIL capacity is at minimum maintained, whilst also delivering an uplift in terms of overall industrial capacity. Any such proposals will be reflected in the next DPD to be submitted.**

## **Policy 26 – Safeguarding and Managing Change in Strategic Industrial Land Locations (SIL)**

To safeguard and manage SIL:

- A. The following uses are acceptable:
  - i. Light industrial (Class E **Part** G iii);
  - ii. General industry (Class B2);

- iii. Storage and Distribution (Class B8);
  - iv. Waste sites **management, secondary materials, and aggregates** (B2 / B8 / Sui Generis)
  - v. **Utilities infrastructure (such as energy and water);**
  - vi. **Lane for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure;**
  - vii. **Wholesale markets;**
  - viii. **Emerging industrial-related sectors;**
  - ix. **Flexible hybrid space (Class E Part G iii / B2 / B8);**
  - x. **Low cost industrial and related space for SMEs;**
  - xi. **Research and development of industrial and related products or processes; and**
  - xii. Uses ancillary to the above.
- B. New development will be supported on SIL, where it:
- i. Provides improved high-quality, fit for purpose **acceptable** employment space and infrastructure; and
  - ii. Allows for future flexibility ~~in the above uses~~, including future subdivision and / or amalgamation for a range of employment uses; and
  - iii. **Provides either the full replacement or the intensification of existing industrial capacity. Landowners should, where appropriate, work with those of adjacent sites in order to make the most efficient use of land.**
- ~~C. A masterplan approach to the intensification of industrial capacity in SIL is supported (see Policy 30 – Industrial Masterplan Approach)~~

**9.10** Strategic Industrial Locations are the capital's main reservoirs of industrial land and are of strategic economic importance for London and as such will be safeguarded. Distribution and industrial uses (Class E G iii, Class B2 and Class B8) are the main focus for these areas. Over the years, Waltham Forest has lost some of its industrial land to other uses; the remaining industrial land is therefore critical to the borough's economic success and any new development in the SIL should not lead to any overall loss of employment floorspace.

**9.11** Renewal and upgrading of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where it allows for future flexibility including both subdivision and amalgamation as required to meet needs.

## **Policy 27 – Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS)**

To safeguard and manage LSIS:

- A. The following uses are acceptable:

- i. Light industrial (Class E Part G iii);
- ii. General industry (Class B2);
- iii. Storage and Distribution (Class B8);
- iv. Waste sites **management, secondary materials, and aggregates** (B2 / B8 / Sui Generis)
- v. **Utilities infrastructure (such as energy and water);**
- vi. **Lane for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure;**
- vii. **Wholesale markets;**
- viii. **Emerging industrial-related sectors;**
- ix. **Flexible hybrid space (Class E Part G iii / B2 / B8);**
- x. **Low cost industrial and related space for SMEs;**
- xi. **Research and development of industrial and related products or processes; and**
- xii. Uses ancillary to the above.

B. New development will be supported on SIL, where it:

- i. Provides improved high-quality, fit for purpose **acceptable** employment space and infrastructure; and
- ii. Allows for future flexibility ~~in the above uses~~, including future subdivision and / or amalgamation for a range of employment uses; and
- iii. **Provides either the full replacement or the intensification of existing industrial capacity. Landowners should, where appropriate, work with those of adjacent sites in order to make the most efficient use of land.**

~~C. A masterplan approach to the intensification of industrial capacity in SIL is supported (see Policy 30 – Industrial Masterplan Approach)~~

**9.12** Locally Significant Industrial Sites (LSIS) are important to the local economy. LSIS are predominantly industrial sites and complement the borough's SIL areas. The same priority uses are expected to be delivered on LSIS and SIL.

**9.13** Renewal and upgrading of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where it allows for future flexibility including both subdivision and amalgamation as required to meet needs.

## **Policy 28 – Safeguarding and Managing Change in Borough Employment Areas (BEA)**

To safeguard and manage land in Borough Employment Areas:

- A. The following uses will be supported:

- i. ~~Light industrial~~ **Offices** (Class E **Part G iii i**), **subject to compliance with Policy 40 – New Retail, Office and Leisure Developments;**
  - ii. Workspaces (Class E **Part G**)
  - iii. **Research and development of products or processes (Class E Part G ii), or General industry (Class B2)**
  - iv. ~~Storage or Distribution (Class B8)~~
  - v. ~~Waste sites (B2/B8/Sui Generis)~~
  - vi. Uses ancillary to the above.
- B. New development will be supported where it:
- i. Provides improved high-quality, fit for purpose **acceptable** business space and infrastructure;
  - ii. Allows for future flexibility ~~in the above uses~~, including future subdivision and / or amalgamation for a range of employment uses; and
  - iii. **Provides either the full replacement or the intensification of existing employment capacity. Landowners should, where appropriate, work with those of adjacent sites in order to make the most efficient use of land.**
- C. ~~A Masterplan approach to the intensification of industrial capacity in BEA is supported (Policy 30 – Industrial Masterplan Approach)~~

~~9.14 Borough Employment Areas are similar to LSIS and vital part of **perform an important function for** the borough's economy. However, they can provide a wider economic function. BEAs are therefore considered areas suitable for not only industrial uses but also workspace ( offices and workspace within Use Class E G). Other uses will only be considered if delivered as part of the Industrial Masterplan process (see Policy 30 – Industrial Masterplan Approach) and design mitigation will be important as set out in Policy 31 – Co-location Design Principles Part i and ii.~~

9.15 Renewal and upgrading of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where it allows for future flexibility including both subdivision and amalgamation as required to meet needs.

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## **Policy 30 – Industrial Masterplan Approach**

Masterplans for SIL, LSIS and BEA will be supported where they accord with the following approach:

**The London Plan (2021) outlines a process for achieving intensification of designated industrial areas to provide additional industrial capacity. In some circumstances, where it would be to the benefit of the wider area, and demonstrably helps meet**

**industrial and employment needs, this could facilitate the consolidation of industrial use on a designated site, potentially allowing for the subsequent introduction of non-industrial uses into these areas in order to meet other planning objectives.**

**A. Masterplans are required to manage change in industrial locations where uses other than industrial and related uses are proposed.**

**B. Part D of the London Plan Policy E7 sets out criteria that must be met in the masterplanning process in order for the potential for consolidation through this approach to be realised. The following criteria are developed from those outlined in the London Plan and associated guidance as local requirements which must be followed in order to effectively develop a masterplan which can be agreed.**

**C. Procedure:**

**i. Masterplans must be delivered in partnership with and by agreement of the Council and the GLA.**

**ii. Masterplans must take** Take a comprehensive approach and consider **cover** the whole **extent of an entire** SIL, **or** LSIS and BEA location.

**iii. Masterplans must be developed according to a two-stage process:**

**a. Stage 1: Based on up-to-date evidence, including full audit of the designated site, and appropriate engagement with landowners and existing businesses, identify the sub areas within the SIL/LSIS to be “areas of intensification and consolidation”, and, where relevant, those proposed as “areas of change”. These sub areas must be agreed and approved with the GLA and the Council before progressing to Stage 2.**

**b. Stage 2: Further develop the agreed masterplan for the entirety of the SIL/LSIS, and produce detailed sub-area masterplans, which together demonstrate how the industrial capacity outlined in Stage 1 will be achieved. At this stage, in line with Policy 56 – Delivering High-Quality Design consideration should be given to land assembly and opportunity for coordinated development.**

**iv. Following the agreement of a two-stage masterplan with the Council and the GLA, any resultant boundary changes to relevant industrial designations are required to be reflected in the next Development Plan Document to be prepared.**

**D. Outcomes:**

**i. Masterplans must** Do not lead to an overall **any** loss **in industrial capacity across the SIL or LSIS**, and **must** seeks to provide a net increase of **industrial** employment floorspace in the SIL, LSIS or BEA location **capacity**<sup>1</sup>.

**ii. Industrial intensification must be achieved ahead of delivering any non-industrial uses.**

**iii. Masterplans must take an “industrial first” approach to phasing, ensuring that the agreed industrial capacity is delivered ahead of any other uses.**

~~C. Provide uses in line with Policy 26 — Safeguarding and Managing Strategic Industrial Land (SIL), Policy 27 — Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 — Safeguarding and Managing Change in Borough Employment Areas, as appropriate;~~

~~D. Provide upgraded facilities to be fit for purpose;~~

~~E. Take account of the particular character and visions for the area as identified in Appendix 2 ‘Employment Land Character & Visions’ and evidence base, with further guidance in the Industrial Intensification SPD;~~

~~F. Are delivering in partnership and agreement by the Council and other stakeholders including the GLA;~~

~~G. Undertake a two-stage identification process:~~

~~— i. Firstly, Sub Areas of Intensification and Consolidation; and~~

~~— ii. Secondly, Sub Areas of Potential Change;~~

~~H. Delivering intensification and consolidation of sub-areas; providing employment space ahead of any other development;~~

**E. Evidence:**

**i. Masterplans must be informed by an up-to-date audit of the designated location and evidence covering employment land needs, wider spatial context, land ownerships, partnerships and engagement, and infrastructure requirements.**

**ii. Masterplans must be** Are supported by a Viability and Delivery Plan.

**iii. Masterplans must set** Set out how existing businesses will be retained through a Retention and Relocation Strategy; and

**iv. Masterplans must be** Are supported by a Servicing **and Management** Strategy.

**<sup>1</sup> Industrial floorspace capacity is: the built floorspace across all complete floors (additional floors in multi-storey developments and basements where they exist); or if the site is utilised primarily for open-yard or storage-based uses, the benchmark figure for reprovision is calculated at 65% of the total site area. Where sites are in waste use, capacity will be considered in through-put terms, in line with Policy 95 – Waste Management.**

**9.19** The London Plan sets out a masterplan approach to managing change in SIL and LSIS ~~and BEA~~ in Policy E7 Industrial intensification, co-location and substitution. The main aim of the masterplan approach is to make sure that industrial land is working efficiently and effectively to meet employment need now and over the plan period. The approach advocated in the London Plan **is** to deliver this **is through** intensification and consolidation

to increase employment **industrial** floorspace capacity and support the economies of London and Waltham Forest.

**9.20** A comprehensive approach is required to deliver intensification and consolidation which considers both borough-wide employment requirements and land capacity ~~but~~ **and** also each employment land area **designated location**. The aim of the comprehensive approach to intensification and consolidation is to ensure that there is a net gain in employment floorspace to meet the overall need for **of an additional** 52,000 sqm of employment floorspace. Appropriate uses on SIL, LSIS and BEA **LSIS** are set out in Policy 26, **and** 27, and 28.

**9.21** Waltham Forest's employment **industrial** areas – SIL, **and** LSIS and BEA – have unique characteristics. Each area has a different role to play in the London-wide and local economy, now and in the future. ~~The vision for each area over the plan period is different for each employment area.~~ Appendix 2 'Employment Land Character & Visions' sets out the character and vision for each **borough's** employment parcel **sites**. These are based on the Employment Land Study (2019) and Employment Land Audit (2020 **2021**). ~~Further guidance~~ **Detail** on how industrial intensification and consolidation can be delivered in each of the employment land areas **borough's industrial locations** will be set out in the Industrial Intensification Supplementary Planning Document.

**9.22** The industrial masterplan process requires engagement with Council and the GLA as well as other stakeholders including but not limited to the landowners and businesses.

**[New Paragraph] Following the development of a masterplan which is agreed by the Council and the GLA, any boundary changes which are proposed to individual designations are required to be reflected in the subsequent Development Plan Document to be prepared.**

**9.23** To deliver intensification and consolidation, Areas of Intensification and Consolidation will be identified. These areas are defined as where there is an opportunity to deliver a large uplift in space for industrial businesses. This uplift is expected to be delivered on-site and ahead of any development on an Area of Potential Change. ~~Areas of Potential Change are defined as areas where there may be opportunity to deliver different uses to those outlined as supported in Policy 26 – Safeguarding and Managing Strategic Industrial Land (SIL), Policy 27 – Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 – Safeguarding and Managing Change in Borough Employment Areas as appropriate.~~

**9.24** These areas will be determined with reference to the following factors:

- Current utilisations of land and sites (including plot ratio);
- Current condition of the stock;
- Deliverability including land ownership;
- Servicing both inside and outside of the site;
- Ability for different uses to exist together;
- Businesses' intentions.

**9.25** The current utilisation of land and sites is a key consideration. Where the existing uses are inefficient this may allow for intensification and consolidation of uses. Older stock will be more attractive to redevelop and intensify as it requires investment and repair. Less fragmented ownership may make delivery of intensification, or consolidation, easier to secure. A further consideration of delivering intensification and consolidation is the compatibility of industrial uses. Some uses are better suited to being located in close



proximity. For instance, light industrial and office or studio space may make better neighbours than businesses with noisy or noxious operations. ~~There is a need~~ **It is important** to understand the future intentions and evolving needs of businesses ~~for example do they need more space to grow into?~~ The identification of both Areas of Intensification and Consolidation and Areas of Potential Change ~~will be set out in the Industrial Intensification SPD,~~ **and for this to inform the production of any masterplan.**

**9.26** The London Plan sets out a masterplan approach to delivering any change in SIL **and LSIS** with further guidance set out in the Industrial Practice Note. The masterplan approach can be delivered by a public sector body or private developer / landowner, as long as it **is** agreed with the GLA and the Council. Each masterplan should take account of the proposed future vision of the SIL **or LSIS** area. Viability and Delivery are key components of the masterplan to prevent the loss of important industrial space across the borough. This should be accompanied with a plan which sets out how existing business will be retained and accommodated in any redevelopment. These should include consideration ~~on~~ **of businesses** that need grow on space. Part of the process of redevelopment will require businesses to be decanted while business space is upgraded. Early engagement with businesses will be vital to the success of any proposed development. To ensure this is delivered successfully, a decant strategy will be expected to be submitted.

**9.27** To ensure that employment uses are delivered and that no further employment capacity is lost in the borough, the employment elements of proposed master plan will be phased to be delivered first. This could be delivered via a hybrid planning application. Both completion and operation of the employment space is expected to be delivered ahead of the first occupation of any other use.

**9.28** ~~Much of the industrial space across the SIL is of poor quality and out of date and therefore in need of updating. The main aim of the masterplan and~~ **Masterplans and** new development in the SIL **and LSIS** areas ~~should be to provide not only intensification~~ **should not only aim to provide intensification,** but also to improve the quality of business **industrial** space to ensure it is fit for purposes and has the required supporting infrastructure to keep, seed and grow businesses.

**9.29** Ensuring that servicing and deliveries can function across the SIL **or LSIS,** and especially when delivering intensification, consolidation or change is important to ensuring businesses can run effectively. Any redevelopment of the SIL **or LSIS** should include a servicing and management plan to understand how it will impact on the existing businesses and existing servicing arrangements. In addition, any impacts on the wider transport network should be set out.

**[NP] Where substitution of capacity from Waltham Forest to another location within London is proposed, this should give full consideration to the positive and negative impacts of substitution, including, but not limited to:**

- **Impacts on the local economy (including the labour market)**
- **Impacts on supply-chains**
- **Impacts of trip distance, congestion, and pollution**

**[NP] Where all relevant impacts have been addressed to the satisfaction of Waltham Forest, the host borough, and the GLA, and the proposal results in a more efficient use of land, substitution of capacity will be supported. The consolidation of wholesale markets following this approach, and in line with London Plan Policy E4.F, will be supported.**