

2.10 Local employment locations

What is the aim of this policy?

- 2.64** The LELs are small, well defined clusters of good quality buildings in office, industrial and warehouse uses, often within walking distance of town centres. The aim of this policy is to ensure the continued functioning of Local Employment Locations (LELs) as a valuable element of the local economy by protecting B Use Classes (office, workshops, industry and storage/warehousing). They form an important element in the local economy by providing a flexible range of modern, good quality premises with appropriate servicing facilities that can host a wide variety of local suppliers of goods and services that are less suitably located in town centres.

DM Policy 10

Local Employment Locations (LEL)

1. The Council will support uses within the B Use Class and appropriate sui generis uses, within a Local Employment Location, subject to:
 - a. the use being appropriate in the location in relation to the surrounding built context
 - b. the intensity of the use and
 - c. the new use meeting the aims in the Core Strategy Policy 3.
2. Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses.
3. New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses. The provision of lower cost accommodation suitable for starter businesses should form part of any new scheme.
4. Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.

Justification

- 2.65** DM Policy 10 supports the implementation of Core Strategy Policy 3 Strategic Industrial Locations and Local Employment Locations, and Core Strategy Spatial Policies 2, 3, 4, and 5. These policies deliver the approach in London Plan Policy 4.4 Managing Industrial Land and Premises. The policy is consistent with the NPPF (paragraph 21) which states that local planning authorities should 'support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area.'

- 2.66** The Lewisham Employment Land Study (ELS) supports the provision of the types of buildings offered by LELs which provide business units capable of being used by a wide variety of firms in growth sectors of the economy including small and medium enterprises (SMEs). These can typically range between 100 and 250 square metres in size.
- 2.67** The ELS also considers that business units should be flexibly specified to be able to meet the needs of a wide range of businesses. The built format of larger scale warehousing units or self storage facilities often do not provide flexible reuse and provide limited employment opportunities, although it is acknowledged that self storage facilities may provide valuable storage space for smaller mail order businesses and town centre businesses. However, the Council does not wish these larger scale storage uses to predominate on what is, in Lewisham, a very limited supply of business land supporting a small local economy with few locally provided jobs. LELs typically supply relatively good quality premises for small businesses which are in demand in Lewisham and which should be re-supplied in any new development. The LELs should therefore be managed to support a variety of business uses that can respond to and take advantage of Lewisham's location close to wider London markets. The Council may apply conditions on planning permissions to ensure the maintenance of employment space.
- 2.68** Changes of uses outside the B Use class will not be considered on LELs. As noted above most of the LELs are within walking distance of local shopping centres and public transport facilities. It should not be necessary to provide facilities such as day care nurseries or cafés on these sites to support their functioning. Churches and community facilities are considered incompatible with business and commercial functioning on these sites which are largely in workshop and storage uses with large numbers of vehicle movements in open servicing areas.
- 2.69** Flexibly specified buildings are considered essential to ensure the long term sustainability of employment uses on these sites. Flexible buildings will allow the reconfiguration of internal space to suit new occupiers with different space requirements and also allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to meet the requirements of new users.
- 2.70** The NPPF (paragraph 17) has a central principle that all development must be sustainable. Councils should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.' A full internal fit out for particular schemes could include the installation of sanitary and kitchen facilities, power points and IT connections (broadband), wall and ceiling finishes and plumbing/heating and related works. A finished unit comprising of a 'shell' and 'core' only will not be acceptable as it will not be considered deliverable or sustainable in the long term by being unattractive to potential occupiers. In some cases, where larger speculative industrial or warehousing buildings are being delivered a fit out to this level might not be appropriate. See also DM Policy 22. In implementing this policy the Council, in consultation with the applicant, will give careful consideration to the needs of potential end users for the premises being provided as part of the development, and will take into account all relevant circumstances when assessing the level of fit-out that will need to be provided.
- 2.71** The NPPF (paragraph 22) states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.' The London Plan Policy 4.4 (Managing Industrial Land and Premises) sets out criteria

whereby the boroughs stock of industrial land should be managed including 'the need to identify and protect locally significant industrial sites where justified by evidence of demand.' The Council considers that the LELs represent good quality industrial land currently in active use that is in short supply in Lewisham.