Matter 12: Note for the Inspector concerning Strategic Site S04 and the adjoining Standard Industrial Estate.

Introduction
It was suggested at the Examination Hearing in relation to Matter 12 that Standard Industrial Estate could be included within the boundary of Strategic Site S04 as an area for Managed Intensification with scope for release should this occur (which it was suggested, could be achieved through a co-location typology) on a comprehensive basis (see map A below) The Council agreed to give some further consideration to this point and the arguments put forward, and to respond to the Inspector and Representors in a written note.

Map A: Area under discussion – Site S04 and Standard Industrial Estate
Further consideration has occurred, and it has been concluded that this is not appropriate, and the Strategic Site boundary should remain as proposed, with other SIL, including that in the Standard Industrial Estate subject to the encouragement of Managed Intensification to yield further SIL capacity, (as per J2) rather than residential capacity, whilst noting scope to do so may be limited. This point is clarified in a proposed amendment to Policy J2 implementation paragraph 6.93c.

Points of Further Consideration

In arriving at this conclusion, the following have been given further consideration, beyond that already set out in the Options Appraisal and ELR Part 1 and 2:

1. The scope for access improvements over the Crossrail line

The Crossrail works have resulted in an additional area of ‘at grade’ land where previously the North London line tracks created severance, due to the new ‘cut and cover’ tunnel that has replaced above ground track at this location. This new ‘at grade’ land of relevance extends from just west of Fernhill Road to Store Road. As is shown on the schematic diagram below, one section of this is to be publicly accessible, (the remainder presenting a development platform) between the portal and emergency access shaft, providing a new pedestrian access to the SIL. This is yet to be publicly accessible and it is not known when the public realm works will be completed, however when it does, it is acknowledged that site access will be improved slightly, with some opportunity for a route connecting with facilities in North Woolwich and the station that avoids industrial traffic. However, as noted in the IIA the PTAL of S04 is presently low (2) and this is not predicted by TfL to increase despite interventions in the area to 2031. In Standard Industrial Estate there is a fractional improvement from 1b to 2. There is not therefore an equivalence with sites immediately adjacent to DLR stations where there is scope to provide new clusters of local services, which are accordingly sequentially preferable for release. Overall it is noted that this access improvement could equally benefit employees, ensuring better access to local employment.
Excerpt from Crossrail Presentation to LBN c. 2013

2. Impact on SIL integrity/functioning

Unlike the SIL sites E & D (see map B below) included within the Strategic Site which are cleared providing scope for a net increase in industrial/warehousing capacity to meet demand, the remaining parts of the Standard Industrial Estate (B, C & A on the map below) are functioning industrial sites, with Site B in particular containing modern industrial units with extensive well-configured yard space as photographed below. These would be considerably disrupted were comprehensive re-development to be encouraged even if it were possible for them to be subsequently incorporated into a new build scheme.
Yard space has frequently been seen as an ‘inefficient’ use of space in recent years, but is now acknowledged as a result of engagement with industrial space users and agents to be an important part of SIL functionality (see EB11, EB12) which any Managed Intensification would need to incorporate to be policy-compliant.

Site A continues to be occupied largely by open storage, for metal recycling (see aerial image below). This kind of use is frequently affected by development pressure, with limited appetite by developers to incorporate them in mixed use/co-location schemes, but most certainly has an economic role in the area and as part of wider circular economy objectives (see EB11, EB12). SIL uses and demand are also extensive and of the more traditional nature to the west, which includes land used and in the ownership of Tate and Lyle, a major economic player in the borough. Therefore, the most opportunity for Managed Intensification probably exists at Site C, given its present TV studio/D1 use and apparent limited requirement for yardspace (see aerial imagery below).

It is also noted prior to Crossrail clearance, Site D was also a modern well-functioning part of this industrial estate, with displacement that has already occurred.
Aerial Image (from Google Earth) of the land in question.

Aerial Image (from Google Earth) of the wider site context, including a bus depot and open storage of sugar (that covered in turquoise netting).

3. Deliverability
The acceptability of release via Managed Intensification in terms of residential quality as well as the ability to meet Managed Intensification criteria (Policy J2:3b) would depend on this occurring on a comprehensive basis. As can be
seen from Map B there are 5 different freehold landownerships that would need to be co-ordinated and we have no evidence to suggest this could be achieved. This is very different to the other locations where it is proposed, where ownership is much simpler – singular or with parties who are incentivised to co-operate due to the site allocation and mutual dependency (as at Beckton Riverside where, as the SOCG notes, TfL need land outside their ownership for depot expansion, and developers in turn need new transport infrastructure).

In addition, Site E is leased until the 2080s by BT. BT have in turn recently got consent (ref 17/03449/FUL, Feb 2018) for a new warehouse on the southern part of their land, with clear implementation intent given recent applications to approve details etc. as well as operational needs to re-locate from another site being cleared. Engagement with BT at the time of the Issues and Options consultation when their warehouse/depot scheme was in preparation, and during subsequent refinement of the evidence base suggested that (despite residential values exceeding industrial ones) they had no interest in incorporating residential in their scheme and that their operational needs would be fettered by on site residential even were such a proposition to be allowable through a site allocation. The scheme has also been designed on the assumption that the SIL to the west and north will be maintained, i.e. with no account of possible residential neighbours on these sides. A key part of the ‘jigsaw’ and notably a river fronting one would therefore be missing.

**Conclusion**

Overall therefore, it is not considered that such an extension to the Strategic Site boundary and specification of Release via Managed Intensification is justified or would be effective in delivering plan objectives.