

CENTRE FOR LONDON

# Making Space: Accommodating London's industrial future

*Report of the Industrial Land Commission*



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Nicolas Bosetti, Nikita Quarshie and Rob Whitehead

## About the Commission

This is the final report of Centre for London's independent expert-led Commission on the future of London's industrial land. The Industrial Land Commission was established to explore how London can make the best use of limited available land to meet the varied needs of the city. Between March and October 2021, the Commission met four times to look at the role of industrial spaces in London's economy, how these spaces might change in the future, and the supply of / demand for industrial land in London. In September 2021, it published an [interim paper](#) setting out its initial conclusions and seeking feedback from the public that would inform this report's recommendations.

While this report reflects the views of the Commission as a whole it should be not be assumed that all Commissioners agree with every word or recommendation.

## The Commissioners

The Commission was chaired by Liz Peace CBE, Chair of Trustees at Centre for London and Chair of the Old Oak and Park Royal Development Corporation. The other members of the Commission were:

- **Mark Brearley**, Director, Kaymet London Limited
- **Andrea Charlson**, Senior Advisor, ReLondon
- **Jessica Ferm**, Associate Professor, Bartlett School of Planning, University College London
- **Stefania Fiorentino**, Lecturer, Department of Land Economy, University of Cambridge
- **David Francis**, Director, West London Alliance
- **Caroline Harper**, Chief Planning Director, Be First
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- **Paul Lewin**, Planning Policy and Projects Manager, London Borough of Brent
- **Holly Lewis**, Partner, We Made That
- **Gerald Mason**, Senior Vice President, Tate & Lyle Sugars
- **Rob McNicol**, Acting London Plan Team Manager, Greater London Authority
- **Martyn Saunders**, Principal – Planning, Development and Regeneration, Avison Young

## Acknowledgements

The Commission is incredibly grateful to all those who shared their time and expertise in the course of this project, including our anonymous interviewees and all those who provided feedback to the interim paper. The Commission also thanks the expert witnesses who delivered presentations at its meetings, including John Allan (Director, Industrial, Sales & Leasing, Avison Young) and Allie Piehn (Director, Studio Egret West).

In addition, the Commissioners would like to thank the London Borough of Enfield for arranging a tour of industrial sites and premises in the Upper Lea Valley area. We are particularly grateful to James Collister, Industrial Sector Development Manager; Sandra Taylor, Economic Development Officer; Im Rahman, Inward Investment and Business Support Manager; and Ed Jones, Principal Planner, for organising and leading the tour. The Commissioners deeply appreciate the efforts of the teams at Enfield Brewery and OMA X Film Studios in inviting the Commissioners to their premises and responding to their questions.

The Commission also gives thanks to colleagues at Centre for London who supported the Secretariat throughout the research process. Further, they would like to thank Jack Brown (Lecturer at King's College London), Richard Brown (Independent consultant) and Ben Rogers (Professor of Practice at the University of London) for their essential role in developing the project and setting up the Commission.

Finally, this project would not have been possible without the generous support of our Principal Sponsor, SEGRO, as well as that of our Supporting Sponsors Be First (London Borough of Barking & Dagenham) and the London boroughs of Brent, Ealing, Enfield and Southwark.

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# Summary

### Over the last two decades London has lost too much of its industrial land. This has led to rising land values and rents:

- In the last 20 years, London has released 24 per cent of its industrial floorspace to other uses.
- The vacancy rate on London's industrial land has dropped from 16 per cent in 2001 to 4 per cent in 2021. In central London it is as low as 2 per cent. Such low vacancy rates prevent a normal "ebb and flow" in the property market and are a sign of intense pressure on industrial space.
- Some industries and businesses are able to meet rising costs, but smaller enterprises – as well as sectors like repair and recycling – risk being squeezed out.

### High demand for land in London means that housing and industrial uses are often seen as being in conflict. But it doesn't have to be like this:

- London needs land for jobs as well as housing, and industrial land is a major source of employment outside central London.
- Industrial spaces and warehouses are essential when it comes to supporting and servicing our homes. For example, they store the materials needed for construction and maintenance, process the waste we produce, and provide the infrastructure needed to fulfil deliveries.
- Industrial spaces are also critical to meeting our net zero carbon targets and reducing air pollution. Having industrial sites close to homes and other centres of demand will reduce delivery miles driven, enabling the use of electric vehicles and cargo bikes as well as the development of local repair and reuse centres. London is the densest city in the UK, with many competing street uses such as travel, leisure and residential.

### A new approach is needed to address London's industrial land shortage:

#### **Improve representation**

- Industrial activities and spaces are diverse and constantly evolving. However, they are poorly understood and generally undervalued in policymaking and public opinion.
- For their voices to be heard, industrial land occupiers should set up an independent and influential representative body. They will also need a powerful champion at City Hall and in each borough.

#### **Enhance local planning, protection and flexibility**

- Around 30 per cent of London's industrial land isn't protected by designation. While London Plan policies currently offer some protection, boroughs should take responsibility for protecting London's remaining industrial spaces through designation and policy.

- Uses of industrial land are highly diverse, and different levels of protection should exist to reflect this variety. London boroughs should also have more flexibility to adapt land use to suit local and current circumstances.

#### **Additional provision**

- Protecting existing industrial land won't be sufficient to meet London's needs, as demand looks set to continue increasing and diversifying. As a result, London will likely need more industrial space – and in new locations, not just existing ones.
- While the market can deliver some of these changes, the Mayor of London and the boroughs will need to step in to intensify the remaining industrial land and support industrial spaces in new locations.

#### **To do this effectively, London government will need:**

- **New evidence.** Too little up-to-date evidence is available on how much industrial space the city has and needs. Not enough is known about its type, quality and affordability. To make informed decisions, London boroughs and the Mayor need to develop a live, granular understanding of the city's industrial land needs.
- **Powers and investment.** National government should leave London planners to define the city's industrial land strategy. Instead, it should invest in infrastructure across London and the Wider South East that will unlock additional industrial capacity.

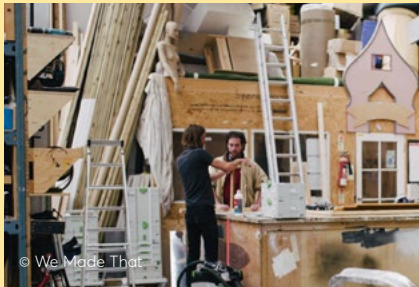
#### **Research Methods**

Research for this report was carried out using a mixed methods approach. A review of literature and datasets on the supply and demand of industrial accommodation was conducted, as well as a review of policy documents on impacting industrial land. The authors also conducted 20 interviews with industrial land occupiers, local authority planners, industrial land market experts, business lobby groups and architects working on industrial land projects. This report is also informed by presentations made to the Commission by Avison Young, Studio Egret West and BeFirst. Finally, this report builds on the findings of two Centre for London reports published in 2021, [Worth the Weight: Making London's deliveries greener and smarter](#) and our interim paper, [Working Space: Does London have the right approach to industrial land?](#)

## What activities take place in London's industrial spaces today?

London may no longer be the manufacturing and shipping heavyweight of the past, but its remaining industrial spaces still host a rich network of operations and businesses. The diversity of these activities means that attempts to categorise them can be difficult. Standard Industrial Classification (SIC) codes, often used in industrial land surveys and audits, are useful in breaking down employment by sector. But they also mask the interdependence between London's industrial spaces and the businesses they supply, as well as the fact that some businesses have several functions (for example, bakeries that double up as cafés).

### Traditional industrial activities



➤ Set prop production

Some operations are more “traditional” in nature, which this report will refer to generically as “industry” or “industrial activities”. These include manufacturers producing everything from sugar and biscuits to foldable bikes, set props, high-end clothing and bespoke furniture. While large-scale manufacturing is rare in London, there has been a rebound in small-scale or artisanal production, both for consumption within the city and export elsewhere.

### Infrastructure

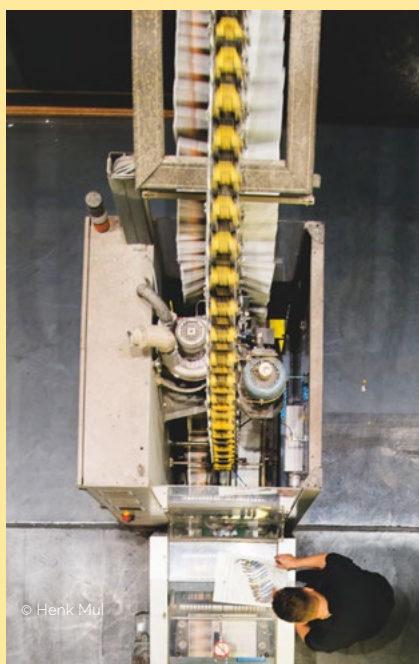


➤ Waste truck repair

Industrial activities also include vehicle repair and storage for construction materials, as well as other critical and strategic infrastructure that keeps the city functioning. This includes waste management sites, water storage, transport depots/garages, and warehouses that ensure our homes, businesses and shops are supplied with goods.

Like manufacturing, many of these activities were once fixed features in London. However, they have had to undergo an evolution to keep up with the city's growth and changes in consumer behaviour. For example, last-mile logistics hubs and dark kitchens are recent responses to the growing consumer demand for ultra-convenient food and goods deliveries.

### Non-industrial activities



➤ Printing press in industrial spaces

Many activities taking place in London's industrial spaces have little in common with traditional industrial activities – except that they also rely on industrial land. For example, film and recording studios may be located in such areas because they require space on a similar scale. However, many such businesses are difficult to categorise: galleries and artist studios may moonlight as maker spaces (and vice versa), while many such industries have also historically benefited from access to cheaper and more flexible industrial spaces. These activities, and their reliance upon or proximity to other types of operations, can mean that the distinction between “industrial” and “non-industrial” activities sometimes becomes blurred. They also speak to the hybrid nature of the activities themselves, with some businesses blurring the lines between production, retail and community enterprise.

Increasingly gaining attention are those activities that “service the services” and play a supporting role in London's wider economy. These include catering, printing, cleaning, hospitality, security, maintenance, equipment provision and much more. Such industrial activities don't play an isolated role in London's economy – in fact, they are critical in servicing London's homes, offices, shops and cultural/entertainment venues. And while these “support” operations may not specifically need to take place in London, there are many disadvantages in moving them out – such as the economic and environmental impact of longer journeys to provide these same services.

# Introduction

Like bodies, cities have a metabolism. Processes exist that convert one resource to another, or move goods from place to place. As with any large city, London has its own distinctive metabolism – and one that relies on industrial land in a major way. Industrial spaces keep London innovating and thriving: they support commerce, infrastructure, utilities, key environmental services, and many of London’s creative talents. In fact, every Londoner – even those who have never stepped into an industrial park or recycling centre – needs the services they support.

Despite its importance, however, industrial land rarely gets the attention it merits. In part, this is due to the wide variety of activities it can support. Firms that use industrial land can range from high-end manufacturers and global exporters like Brompton Bicycle, to waste processors, hauliers, supermarkets, auto mechanics, timber yards, bakeries, and a panoply of other operations. However, a lack of appreciation of this diversity means that occupiers and users of such spaces are often negatively perceived as low skilled, low paid, and unsociable. At the same time, the sheer breadth of uses leads those same occupiers to struggle in finding common cause when defending the needs and interests of their own businesses.

## London’s industrial land

London is not a neat city. It has grown organically, over time, in fits and starts. Seen from above, much of our city is covered by houses. Nonetheless, over time large swathes have been demarcated for industrial use – notably in Park Royal, the Lea Valley, Barking, the Royal Docks and Heathrow – with some of these being hemmed in by a green belt that is now firmly anchored in the popular and political imagination.

On a closer, street-by-street view, pockets of industrial use sit cheek by jowl with homes, parks and offices. London’s economic and population growth in the last three decades has put industrial land under particular pressure. The transition to a service-based economy – and the almost unquenchable demand for homes in London – has led to the swallowing-up of many hundreds of hectares of industrial land.

All this has happened alongside major changes in how we live, work and shop. The pandemic has turbocharged the demise of some high street retail and accelerated the boom in home deliveries. We also face multiple other challenges including air pollution, congestion and the climate crisis.

## Our response

The pressures on industrial land are kept in check somewhat by London’s complex planning system. Yet, as we set out in this report, we are reaching a new boiling point. Industrial accommodation, especially in inner London, is in such short supply that rents are rocketing, threatening the smooth functioning of the city. In some places the pendulum has swung and industrial land values have overtaken housing land values. We will need to find ways of making both work together.

The Industrial Land Commission was set up to explore some possible solutions to these emerging problems. The Commission has since used its collective expertise to gather insights into the needs of industrial land occupiers, landlords and neighbours against the wider London context. We are united by a shared goal: to ensure that our city works for all of us, and continues to thrive in an environmentally sustainable way. Here we present our summary of the challenges – and our suggested remedies.

# 1. Why London needs industrial accommodation



“London is an intricate agglomeration and ecosystem, with smaller, medium and large businesses feeding off each other. And that’s what makes the city so special and a powerhouse.”

**Director of Planning, business membership group**

From the wholesale food markets that keep our fridges and restaurants full, to the recycling centres that manage the city’s waste, industrial land and the activities it supports have an outsize impact on our daily lives. When viewed as a whole, it is clear that they generate many interrelated benefits for London – including access to diverse employment opportunities and a thriving economy. With the climate crisis putting pressure on cities around the world, London will need a sufficient supply of industrial land within the city to achieve the transition to net zero and create enough green jobs for a thriving greener economy. In addition, industrial land also plays a more subtle role in nurturing London’s reputation for innovation, as it provides the space for new ideas and businesses to come into being.

### **Sustaining the economy**

Industrial land supports businesses, operations and infrastructure that contribute to the success of London’s economy. In 2017, jobs in the manufacturing, construction, wholesale and repair, and transport and warehousing sectors accounted for 16 per cent of London’s total Gross Value Added (GVA), worth approximately £78.1 billion.<sup>1</sup> This figure excludes the overall contribution of the diverse range of activities happening on industrial land. It also excludes the economic value of sectors not generally considered as industrial, due to the limits of sectoral classifications.

Additionally, activities that happen in industrial spaces play a vital role in sustaining other aspects of London’s economy. In 2016, a survey carried out across some of London’s major industrial estates found that servicing activities – including cleaning, catering, printing and technology support services – made up 33 per cent of floorspace.<sup>2</sup> These activities maintain London’s homes, offices, shops and cultural venues, allowing the many parts of London’s economy to keep running smoothly.

### **Providing diverse, local employment opportunities**

While the decline of manufacturing and shipping within the city has provided some justification to release industrial land for other uses,<sup>3</sup> London has also seen a recent increase in employment for some types of manufacturing and other activities that rely on industrial land. Between 2015 and 2019, employment in food manufacturing in Greater London grew by 48 per cent, construction employment by 35 per cent, and logistics, warehousing and distribution employment by 23 per cent.<sup>4</sup> The demand for greener jobs and the shift to a circular economy – which will require a reduction in London’s waste – has the potential to create up to 12,000 new green jobs, many of which will be based on London’s industrial land.<sup>5</sup>

Additionally, industrial land supports a diverse range of employment opportunities. As mentioned above, industrial estates play host to a wide variety of firms in critical sectors, such as construction, printing and repair – while manufacturers range from vaccine producers to bespoke jewellery makers. These businesses often bring employment opportunities to local residents. The most recent audit of industrial estates in the Upper Lea Valley, which took place between 2012 and 2016, found that 63 per cent of jobs in its industrial spaces went to local people.<sup>6</sup>

These sectors also offer a diversity of high- and low-skilled jobs that

attract different types of talent. Some are entry-level roles that provide training opportunities and a career path for Londoners with few or no qualifications. For example, micromobility logistics operators such as Pedal Me provide entry-level jobs that require specialist skills by offering an extensive four-year training programme in partnership with the City of London Corporation.<sup>7</sup> Troubadour Theatres film and TV studio is another example of a contribution to local employment and skills development. The studio, which will be built as part of the development of Meridian Water, will also host a skills academy that will provide training for residents on how to work in the film and television industry.<sup>8</sup>

## Achieving environmental goals

For London to meet its net zero carbon emissions target by 2030, it will need to take significant action quickly. Industrial land located within the city's boundaries will be necessary to meeting this goal and the city's sustainability agenda. One area in which industrial accommodation will be essential to reach net zero is the movement of goods and services. Delivery vehicles now make up a fifth of London's total carbon emissions from road vehicles, and contribute to high levels of congestion.<sup>9</sup> The loss of industrial land within London, and the displacement of warehousing infrastructure, results in more delivery vehicle kilometres travelled to deliver the same value of goods and services.<sup>10</sup> A senior member of one of the UK's largest trade associations emphasised to us that, in order to ensure speedy and greener delivery movements in London as online shopping increases, we will need suitable consolidation centres near homes and stores to reduce delivery miles. The capital will also need depots in similar locations if deliveries are to transition to EVs and cargo bikes, as space will be needed to house and maintain the number of vehicles required.<sup>11</sup>

As London shifts to a greener and more circular economy, the city will need suitable spaces to repurpose its waste and reduce its consumption-based carbon emissions. Back in 2014, the London Infrastructure Plan 2050 estimated that the capital would need 40 additional facilities for the reuse, repair and manufacture of materials.<sup>12</sup> Industrial land will also support the much-needed retrofit revolution of London's buildings. And there is untapped potential for activities on industrial land to act as a source of sustainable heating – for example, by using the excess heat generated in data centres to supply district heating systems.<sup>13</sup>

A green revolution requires new technologies, businesses and infrastructure that are still being tested and may not even be imagined yet. London will therefore need to ensure it has sufficient industrial accommodation to meet its future needs.

## Nurturing London's spirit of innovation

By acting as an incubator for startups, industrial spaces help sustain an intricate network of creative and innovative sectors. These play an important role in maintaining London's global status as a creative hub and making the city a desirable place to live and work.

Access to affordable and flexible spaces supports London's creative ecosystem. With access to people, tools and sites, graduates from London's universities or specialist schools can go on to produce and create within the city. A biomanufacturing company we spoke to mentioned that, as a young organisation, many of its employees are recent graduates in their early twenties and thirties who want to live in the city. While the company had piloted a facility in the south of England, they had struggled to find highly skilled workers with the same level of expertise and access to new knowledge as those they had previously worked with in London.

Makers in Tower Hamlets and Hackney have also been explicit about the need to be in London so that they can access talent and consumer

markets, as well as establishing links with other businesses for custom and collaboration.<sup>14</sup> Having a wide range of activities taking place in close proximity means that designers and creators can test ideas quickly. Makers have also highlighted that being located close to residents has allowed them to offer places in which communities can come together to share tools and knowledge. From a policy perspective, this proximity could help revitalise high streets by encouraging hybrid light industrial and retail venues such as Bread Ahead or makerspaces.<sup>15</sup>

### Supporting the city through crisis

The impact of the COVID-19 pandemic has highlighted the fundamental role that industrial land plays in keeping the city functioning. Many Londoners have experienced the tension of empty supermarket shelves, while expectations for cheap and fast home deliveries have also increased. Online shopping was at an all-time high during the pandemic, with Internet sales making up 35 per cent of total UK retail sales in February 2021 (compared to just 18 per cent in February 2019).<sup>16</sup> The market is responding to this behaviour. In Q1 2021, industrial space take-up (the amount of space being leased) and investment volumes of third party and “big box” distribution across London and the South East were double the amount recorded in Q1 2020, with retailers and distribution centres accounting for 70 per cent of this take-up. By Q3 2021, ecommerce continued to drive take up of new industrial space.<sup>17</sup> It remains to be seen how lingering changes to the way we live and work will impact on the need for certain types of business in the city’s industrial spaces.

Industrial land clearly holds value for London. However, the need for industrial spaces must still contend with other longstanding priorities for London, such as providing a significant number of affordable and quality homes. While a balancing act between these different uses may be unavoidable, it is important to understand the complementary role that industrial infrastructure and occupiers play in servicing the other types of land use.

## 2. What industrial occupiers need



“The problem with constantly referring to industrial floorspace capacity and square metres is that it doesn’t give you enough detail or information about what’s being lost or gained. It doesn’t tell you the typology of the space or its affordability. From that figure it doesn’t give you the right types of detail such as how valuable they are for startups or SMEs.”

**Industrial Sector Development Manager, London borough**

London can no longer afford to lose industrial land, according to the last comprehensive study of demand conducted in 2017 to inform the London Plan. Looking at how demand is expected to change over time, the study concluded that London should only release nine of its 7,000 hectares of industrial land every year. This is a more-than-tenfold reduction from the 106 hectares released annually between 2010 and 2016.<sup>18</sup>

The notion that London can still afford to release some of its industrial land has since been challenged, most notably by the Planning Inspectorate in its 2019 report. It noted that since local authorities had already earmarked 800 hectares for release by 2018 – a move which would likely result in a loss of industrial floorspace – London would actually need an estimated 330 additional hectares of industrial land.<sup>19</sup>

Part of the dispute over how much industrial land London needs to function also depends on assumptions about how that land is built up and used. More efficient uses of industrial land (for example by building multistorey workspace) allow for more release elsewhere, but building over several stories is more (or less) cost-effective depending on the activity it has to accommodate – for example, ensuring lorry access to upper floors is particularly expensive. Where land is being released is also important – generally inner London boroughs have released a lot more industrial floorspace (see [Appendix](#)), which made the shortage most acute there.

For industrial land occupiers, it’s not just the amount of floorspace that matters. Like homes or offices, workshops and warehouses need to be in the right place, of the right type, and at the right price points. If anything, industrial land occupiers have more diverse requirements than other uses, reflecting the wide range of activities taking place on industrial land. Businesses such as distribution centres or waste recycling plants need large, standalone warehouses: others, such as jewellery workshops, work well in shared buildings. Generally, however, industrial land occupiers do have a set of core needs, which we set out below.

#### **Core needs common to most industrial land occupiers:**

- Flexibility of accommodation. This enables businesses to fit out their own activities and allows for growth or leasing to other businesses if the market context changes. For light industrial uses, railway arches are often hailed as a good example of flexible space, as they can host activities ranging from wholesale and car repair to food-making and micro-consolidation.
- Good public transport links to attract workers.
- Access to suitable utilities such as energy input or wastewater output. The ability of the electricity grid to support local vehicle charging is a growing and significant concern.
- Accommodation free from pollution. Previous activities may have rendered former industrial sites unusable without significant investment to clean them up.

### Core needs that differ across industrial land occupiers:

- Sufficient yard space that can be used for activities such as storage or production.
- Quick and reliable vehicle access for freight and deliveries, so businesses can get their supplies and reach their customers easily.
- Proximity to homes and high streets. This reduces the need to travel and may be necessary for customer-facing or rapid deliveries.
- Affordable premises for startups or businesses that add other types of value to the city.

### Does London's industrial economy have the accommodation it needs?

The drop in the vacancy rate for industrial premises from 16 per cent in 2001 to around 4 per cent in 2021 may seem to indicate that London's industrial space is being well used.<sup>20</sup> But such a low vacancy rate really suggests that demand is not being met. Vacancies have been particularly low for buildings. The 2017 London Industrial Land Demand Study showed that in several London subregions, including central London, there were virtually no vacant industrial buildings for businesses to move into (see Figure 1 below). At the time of writing, this is the most recent available data – but it is also worth noting that since 2020, demand for industrial land has been boosted further by the boom in personal deliveries due to the pandemic.<sup>21</sup>

Figure 1: Share of industrial accommodation that is vacant (2017)

	Vacant industrial land	Vacant industrial buildings	Total vacant accommodation (land + buildings)
Central	1.7%	0.6%	2.3%
North	5.3%	0.1%	5.4%
South	2.8%	0.9%	3.7%
East	9.1%	2.5%	11.6%
West	2.8%	2%	4.8%

Source: London Industrial Land Demand Study (2017).<sup>22</sup>

Such low vacancy rates mean that industrial businesses are highly unlikely to find accommodation that meets their needs at a price they can afford. Anecdotal evidence from our interviews confirmed that industrial businesses have great difficulty in finding suitable space to operate from in London:

“For a long time we have been looking for the ideal property to make our home, we needed a mixture of office space and meeting rooms, light industrial space, as well as a laboratory – it’s difficult to find a place like this in London that is ready to move into immediately. That’s because we needed a site that is mixed, that is quite big and where we’ll also have room to grow into. Our biggest issue has been finding a space within the central London area.

As a young company, a lot of our team are recent graduates and want to live in London. So we needed somewhere that’s relatively close to the city and had a substantial power supply for their equipment. We could find places that were big enough but not any that had all of these things in combination, with the necessary infrastructure like electricity and right lighting.”

**Founder, waste transformation startup**

New industrial buildings are being built but there are relatively few of them, and they tend to be designed for high-value, high-growth industries such as logistics or data centres. More traditional industrial activities have reported that the demand for logistics space has further inflated industrial rents. Yet logistics businesses themselves have expressed how difficult it is to find

space for consolidation centres within London – especially sites that offer proximity to consumers, good transport links and energy infrastructure to support vehicle electrification.<sup>23</sup>

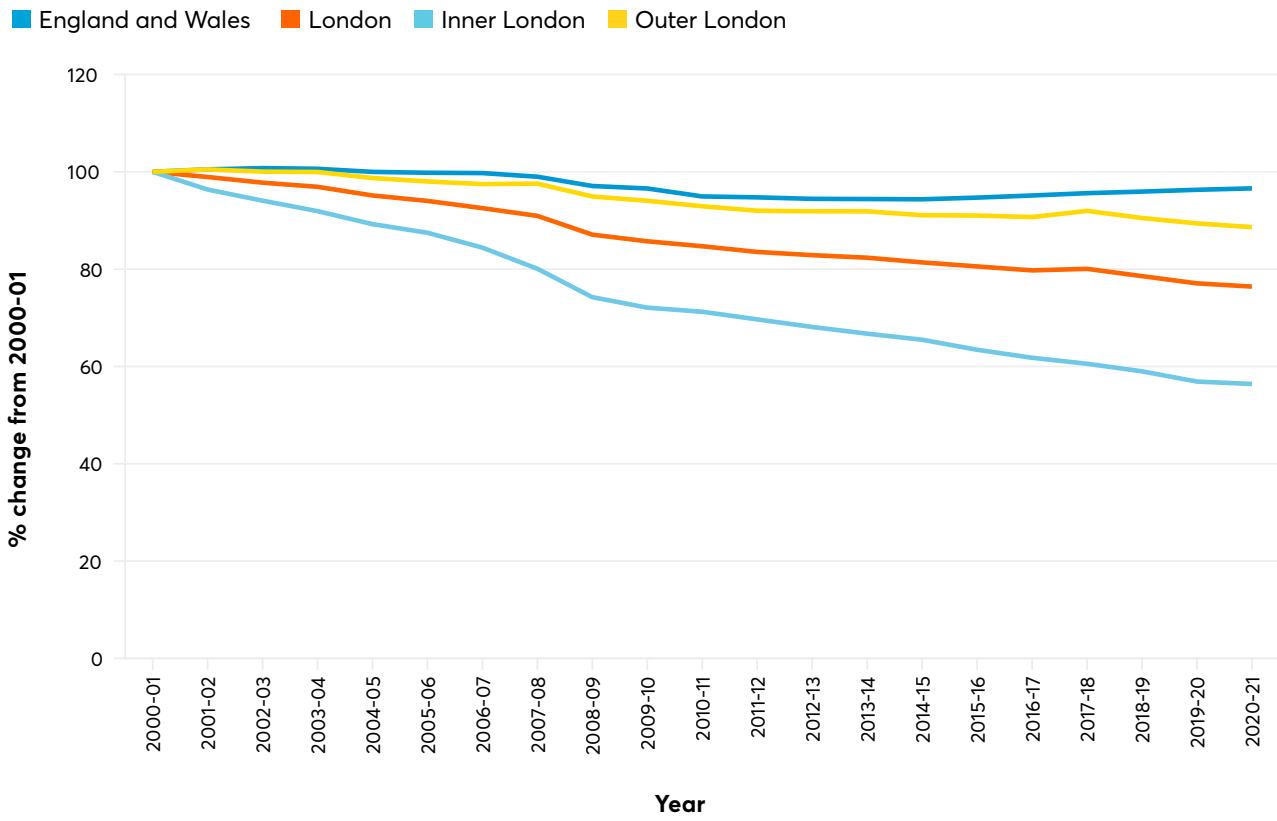
On top of this, the latest data suggest that industrial land release has continued since the last assessment of industrial land supply was conducted – both in inner and outer London boroughs – indicating that shortages of accommodation are likely to have worsened in the last few years (see Figure 2 on the next page).



© Nikita Quarshie

➤ Data centre in Barking and Dagenham

**Figure 2: Change in industrial floorspace between 2000/01 and 2020/21**



Source: VOA (2021). Non-Domestic Rates, Table FS4.1: Industrial sector - total floorspace by administrative area, data to 31 March 2021.<sup>24</sup>

# 3. Solutions



For industrial spaces and occupiers to be protected and supported, industrial activities need to be better understood and valued by London's leaders and national government. We therefore need to help leaders and policymakers understand how industrial accommodation supports the city. In turn, leaders also need to know how they can usefully support London's industrial uses and spaces.

Businesses and occupiers themselves are the best placed to raise the profile of activities taking place on industrial land and articulate the changes occurring within different sub-sectors. They should be afforded more influence in policymaking. Local authorities also need better skills and training to keep up with transformations within the sector.

## 1. Champion industrial accommodation

"There's a misconception about who industrial occupiers are... there seems to be a lack of understanding that everything basically comes from industrial uses and operations in some way or form – from heating, repair, the clothes we wear, the food we eat."

**Industrial land agent, global real estate services provider**

"National government's over-prioritisation of housing is frustrating. There's no regard for the infrastructure needed to support new homes. We think about schools, and broadband and gas, but if you've got more people then there's a correlating need for industrial land. We also need to get industrial land policy right to meet net zero goals."

**Head of Policy, trade association**

Despite their crucial role, activities happening on industrial land are not always well understood and receive relatively little attention. Critical industrial infrastructure – whether waste treatment and management, transport, power or data supplies – is so integral to the city's proper functioning that we scarcely notice these activities unless they are not running as well as they should be. Additionally, some of the more modern activities that take place on industrial estates – such as coffee roasting or dark kitchens – may be less recognisable than the heavy, noisy and smelly industry of the public's imagination. This can lead to misunderstanding and a misrepresentation of the sector. Residents and local politicians may be reluctant to have businesses in their area that they perceive as outdated, low-value or incompatible with the aspirations of their locale, even when those same businesses support and contribute to the development of local economies.<sup>25</sup>

Consequently, we need to better communicate the value of London's industrial spaces, the activities they support, and how these keep the city running. We also need to explain the ways in which certain operations support our consumer behaviours, and the need to bring more spaces into being as our behaviours evolve. For example, while Londoners have become used to the convenience of "just in time" delivery, they may not be aware of the infrastructure required to make such deliveries possible. Understandably, they may also be unaware of the changes occurring within the industry itself to ensure that deliveries are carried out more

efficiently and sustainably – for example, through the use of electric and smaller vehicles for last-mile delivery, or greater use of automation within warehouses. Technology-driven processes such as additive manufacturing or 3D printing may also be far from the experience of everyday Londoners, even as they allow bespoke goods to be produced locally, at lower cost, and with less impact to the environment.<sup>26</sup> Because many of these activities take place behind closed doors in workspaces and warehouses, residents may rarely see them.

Other cities in Europe are working to celebrate and promote their industrial activities. The Made in Zurich initiative is a platform that brings together makers, manufacturers and industrial companies to increase the visibility of manufacturers and promote the production of goods within the city for sustainability reasons.<sup>27</sup> Activities have included holding “Urban Production Days” when the public are invited to visit

participating factories, workshops or studios – including a sculptor’s studio, a textile manufacturer and a chocolate factory. Similarly, AFILOG, a French association of logistics real estate members, organised its first “Logistics Week” for Paris and other French cities in 2021. As part of this, AFILOG invited visitors to tour different warehouses, get an insight into how such spaces work, and see the environmental changes the sector is undergoing.<sup>28</sup>

Misunderstandings about industrial spaces and their value also extend to development professionals and decision makers, who may not be aware of emerging challenges and new trends.<sup>29</sup> Sectors can change rapidly in response to industry trends, external pressures and the wider commercial context, and it is of course difficult for leaders to keep abreast of all these changes and their possible consequences.

Development professionals must also navigate a national and regional policy landscape that prioritises housing. The London Plan 2021 has put forward the need for 66,000 homes per year by 2041 and sets a clear agenda for affordable housing.<sup>30</sup> Industrial land has been championed at a very senior level in City Hall in recent years, and the Draft London Plan in 2019 pushed for a similarly activist policy for industrial land, including a rule of “no net loss” of industrial accommodation. However, this rule was ultimately rejected by the Secretary of State in order to conform to national planning policy’s focus on housing. Although the London Plan 2021 has retained some innovative policies such as intensification and co-location, industrial land policy still lacks the weight attached to London’s housing targets. This follows from a national approach that continues to prioritise housing delivery. It is also noteworthy that national government’s now-abandoned Industrial Strategy gave relatively little attention to the protection of the country’s industrial land.<sup>31</sup>

The priority given to housing delivery reflects public opinion. Londoners continue to feel the impact of the housing crisis, either directly or indirectly, while the implications of shifts in consumer behaviour such as online shopping remain somewhat invisible. Londoners have therefore



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➤ Activities taking place behind closed doors in workspaces and warehouses

accepted housebuilding on brownfield land – often industrial or formerly industrial – rather than the densification of existing suburbs or building on the green belt.

With local authorities constrained by other priorities and a lack of expertise, the city needs high-level industrial land and accommodation champions to ensure that the needs of occupiers and different industrial sub-sectors are heard. These champions should be placed in positions where they can contribute meaningfully to the decisions made about industrial accommodation – for example, in local planning authorities. Membership organisations such as London First and the London Chamber of Commerce and Industry play an important role in raising the profile of their members and making their voices heard. They have also contributed to processes such as the Examination in Public for the London Plan. However, when it comes to industrial land, their influence and activities are generally limited to these formal procedures.

In 2017 the Greater London Authority (GLA), with the support of London First, created the Industrial and Logistics Sounding Board – a coalition of occupiers, business representatives, academics, planners and property experts who would independently scrutinise and respond to the Draft London Plan’s policies on industrial land. One member interviewed said that the Board, which was until recently last active in 2019, had acted as an important starting point in building a collective voice across different industrial land stakeholders, and that it ought to have a continuing role. The Board has now been reactivated, and this Commission has considered how it can be independent and reflective of the diversity of the businesses and sub-sectors that use industrial spaces.

### ***Recommendations***

To make the case for London’s industrial spaces, and to ensure that the sector is better understood, industrial users need to have greater influence. We recommend that:

- **The revitalised Industrial and Logistics Sounding Board (ILSB) should evolve into an independent and powerful London Industrial Land Business Group led by the private sector.** This group should inform planning policies, scrutinise evidence and raise the profile of industrial activities. Though supported by the GLA, the group should be self-organised and cross-sectoral. It should centre the voices of a range of occupiers to reflect the diversity of the organisations who use or rely on industrial accommodation. In being independent, the group should play a key role not only in informing policy, but also in ensuring that relevant bodies are following policy. The Mayor should convene the first board meeting and should attend with the Deputy Mayor in charge of industrial land.
- **The new London Industrial Land Business Group should organise public campaigns and open-door events to increase public visibility and understanding of activities happening in industrial spaces.** While informing policy will be a key mandate of the new business group, it is important that it also plays an outward-facing role by interacting with the public and relevant public sectors. Working with relevant industrial businesses, sectors and the Deputy Mayor in charge of industrial land, the Group should facilitate London-wide cultural events such as festivals and exhibitions to promote the different roles that industrial activities play in London. The Group should also work with local authorities to fund programmes that develop the skills and knowledge of local authority planning officers.

- The Mayor of London should appoint a dedicated advocate for industrial land, this could be one of the Deputy Mayors who would be given a specific and renewed focus on industrial land occupiers and their needs.** London needs more senior leaders who explicitly champion industrial accommodation and push for its protection and growth. The issue of industrial accommodation also cuts across many different briefs, making it difficult for businesses to know who to engage with. The designated Deputy Mayor should actively champion the needs of industrial land users and raise the profile of the industrial economy as a key policy issue. The Deputy Mayor should take the lead in facilitating a joint approach across departments, including those focusing on housing, the environment, town centre regeneration and recovery.
- Local authorities, with the support of the GLA and the private sector, should upskill their staff working with industrial land.** It's important for local authorities to keep up with the changes and opportunities occurring on industrial land. It's also vital that they are able to apply that knowledge when making land use decisions to supporting economic development in their area – for example, when using findings from Employment Land Reviews. However, due to resourcing issues, this is not always possible. Officers can develop their skills and knowledge by having more opportunities to interact with different occupiers and sectors using industrial spaces. Boroughs should also seek out partnerships with organisations such as Public Practice, Urban Design London and relevant universities to exchange knowledge and participate in programmes that will equip officers and teams with new skills. Where they don't already exist, local authorities should also ensure that there are teams dedicated to thinking about industrial needs. These should collaborate across the local authority to ensure that policies and implementation match wider economic, environmental and housing goals.

## 2. Improve evidence to inform decisions

Over the last two decades, London lost much more industrial land than it planned for. These losses have occurred despite pre-existing benchmarks in the Land for Industry and Transport Supplementary Planning Guidance (2011) that established how much London could release between 2011 and 2031.<sup>32</sup> That the city has released almost three times more land than the projected benchmarks allowed suggests a disregard for cautioned release in the face of pressure to build more housing, as well as a lack of coordination across London as a whole. This further indicates that the city needs more regular and up-to-date information on what land is being lost, where, and to what uses. Such an information resource should not just focus on amount of space, but should additionally consider their quality and affordability. It should also be a critical source of information for officers when assessing development proposals, and provide a mechanism to ensure that benchmarks for planning and monitoring industrial release are adhered to.

London already has some tools to monitor the supply and demand of industrial land. The London Industrial Land Supply and Economy Study (2015) provides an extensive overview of the supply of industrial land.<sup>33</sup> Complementary to this is the Industrial Land Demand report (2017), which provides a snapshot of the city's needs for industrial floorspace.<sup>34</sup> At the borough level, Employment Land Reviews (ELRs) are useful evidence bases that local authorities use to develop their local plans and effectively manage competing land uses, particularly between housing and employment.<sup>35</sup>

While this work is essential and has been useful, London-wide studies and borough reviews have their limitations.

- **Timeliness:** Demand and supply studies only offer a snapshot of the need for industrial accommodation at a specific period of time – but market demand can change quickly. As such these studies are inevitably out of pace with economic or policy changes. For example, in the past, increasing housing targets have hung as a shadow over ELRs. Case studies of the London boroughs of Camden and Lewisham found that between 2011 and 2015, annual housing targets rose by 31 per cent and 25 per cent respectively.<sup>36</sup> Publication of the next London Plan supply study is expected in early 2022. It will need to consider the impact of the COVID-19 pandemic, increasing rent and land values, and net zero carbon targets on the availability and quality of London’s industrial spaces.
- **Granularity:** Future supply and demand studies should also address the type, quantity, quality and affordability of existing spaces, as well as those that will be needed by different sub-sectors in the future. The scale of London and the diversity of its industrial accommodation means that London-wide needs assessments will always face limits on detail, so boroughs will need to access and produce more fine-grained data about industrial land supply and demand. Detailed industrial land audits have been conducted on some of London’s more well-known industrial estates, such as the [Park Royal Atlas](#),<sup>37</sup> the [Old Kent Road Employment study \(2016\)](#)<sup>38</sup> and the [industries in the Upper Lea Valley](#).<sup>39</sup> These provide an in-depth survey and analysis of the rich diversity of businesses in those areas, as well as their contribution to the local economy and London’s as a whole.
- **Evidence:** Demand studies will have to find a more robust method of calculating floorspace demand – one based on market intelligence rather than historical trends in floorspace or employment projections (as are currently used). Unfortunately, the latter methodologies have been rendered unreliable by the rapid changes in many activities occurring on industrial land.
- **Value creation:** Certain reviews present local authorities with a choice between retaining industrial uses with low employment density or encouraging higher-density uses.<sup>40</sup> However, employment is a limited lens with which to assess the need for industrial spaces and uses within boroughs. Despite low employment densities, some activities may be a key link in local supply chains. And some critical functions that rely on industrial accommodation – such as logistics and data centres as well as waste, recycling and utilities – often have low employment densities. Instead, some types of industrial space use, such as logistics or waste, should be considered critical infrastructure. A more formulaic approach to understanding need could help with planning accordingly for this infrastructure: for example, planners might consider how much demand for industrial space is generated by each home.
- **Borough boundaries:** Industrial operations and infrastructure have value outside of borough boundaries, and local interests need to be balanced against the needs of other boroughs and London as a whole. Edmonton EcoPark, a waste-to-energy plant located in the London Borough of Enfield, takes in the waste of six other boroughs including Barnet, Camden and Hackney. Local Plans therefore need to be tied more closely to citywide strategic ambitions, and boroughs must collaborate with their neighbours. One approach to this – a form of categorisation used by the Industrial Land Supply and Economy study (2016) – is coordinating and organising according to the property market area that boroughs belong to.

Of course, improving the quality of evidence on supply and demand for industrial accommodation won't alone tip the balance towards industrial spaces in land use decisions. As noted previously, London's land is highly constrained. Though seeking to achieve the right balance, some reviews have pointed to the complications of meeting industrial and warehousing demand when there are also requirements for leisure, retail, health and education spaces in addition to those for housing growth.<sup>41</sup> Nonetheless, to make better, well-informed decisions about London's industrial land, the city will need a more reliable, granular and up-to-date evidence base on the supply and demand for industrial floorspace. This will help boroughs plan for the city's changing needs when it comes to industrial land.

### ***Recommendations***

- **The Greater London Authority should use live property market data for its supply and need studies, which should be updated annually.**
- **Boroughs should lead on needs assessment and develop a more granular, up-to-date understanding of their industrial land. Their Employment Land Reviews should be based on market intelligence and industrial land audits, not just economic models and forecasts.** Boroughs should use this evidence to specify, not only how much industrial floorspace is needed, but also the needs for yard space and parking space.
- **To help with this, real estate companies could make industrial land market data more readily available to policymakers.** This would give policymakers up-to-date, granular intelligence on industrial land supply and need. Industrial occupiers and estate agents could apply pressure onto database holders for this to happen, or this could be part of data base holders' corporate social responsibility metrics.
- **The London Plan and Local Plan review processes should consider housing and industrial demand together, to avoid one taking precedence over the other.**

## **3. Enhance local planning, protection and flexibility**

The foregoing sections have looked at how local authorities and the Mayor can be provided with the resources and the senior champions they need to develop strategies for industrial land. This section looks at the powers they have at their disposal to protect industrial land.

Generally, the Mayor of London and boroughs have strong powers to retain industrial land through the planning system, and protections for industrial land have been strengthened in the 2021 London Plan. But the high levels of industrial land release in the past decade – way above release benchmarks – suggest that overall, London boroughs and the Mayor of London have not used their powers to protect industrial land as much as they could have.

This section looks at each of these powers and what they mean for industrial spaces. It also makes recommendations on how local authorities can use them effectively to protect industrial land. There are three major ways for boroughs and the Mayor to do this: through the use class system, designation, and by placing requirements on developers before they can change land use. We look at these in turn.

### **Use classes**

The use class system is a way for local authorities to influence where in the city activities can take place. Activities are grouped in different categories

as shown in Figure 3 below. Generally, planning permission is required to change from one use class to another, but over time national government has introduced “permitted development rights” under which planning permission is no longer required. We look at this mechanism further below.

**Figure 3: Use classes, after 2020 reform**

<b>B2</b>	General Industrial
<b>B8</b>	Storage or distribution
<b>C</b>	Residential (Hotels, care homes, hospitals, dwellings)
<b>E</b>	Commercial business and services (retail, food and drink, professional services, gyms, GP practices, nurseries, offices, research and development, industrial processes)
<b>F</b>	Local Community and Learning (some essential shops, education, museums, libraries, places of worship)
<b>Sui Generis</b>	Theatres, launderettes, scrap yards, landfill, nightclubs, pubs

National government has recently introduced major changes to the use classes. One key change for industrial land is that most commercial activities are now grouped into a single use class “E”, which also includes light industrial uses. This change makes it easier for light industrial activities to be replaced by non-industrial businesses, and vice versa:

“The unintentional consequence of Class E is that you won’t know what exactly falls under the loss of a class E use... this could be anything from recreational use to a coffee shop. It means that light industrial uses won’t exist as its own separate thing.”  
**Principal Planner, local authority**

From the perspective of local authorities, the grouping of light industrial uses with other commercial uses means they will be less able to safeguard light industrial spaces, as changes within Class E can take place without requesting permission. Of course, this additional flexibility could also potentially create more space for light industrial uses – especially where industrial land values are higher than for other types of use.

### **Designation and safeguards**

The Mayor of London and the boroughs also have the power to designate industrial sites “to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of the general business, industrial and warehousing sectors.”<sup>42</sup> Once a site is designated, specific planning

rules can apply to protect industrial land. For example, boroughs can refuse planning applications for some types of use on the grounds that they take away designated industrial land.

The Mayor of London can also designate “Strategic Industrial Locations” (SILs), and, through the London Plan, require boroughs to designate Locally Significant Industrial Sites (LSIS) based on evidence of local needs. There are currently 55 SIL areas protecting 51 per cent of London’s industrial land, while another 14 per cent is protected by LSIS. The remaining 35 per cent of London’s industrial land is not designated.<sup>43</sup>

The upside of designation is that it’s a rather effective mechanism to protect industrial land from development – and it’s generally easier to protect what already exists than to release land for industrial accommodation elsewhere. But one downside of designation is that it’s currently an all-or-nothing policy: currently, there are no levels of designation to reflect the very different activities taking place on industrial land, and whether accommodation for them can be more or less easily provided elsewhere. Some industrial land occupiers are relatively easy neighbours to accommodate, while others need specific conditions to operate – such as a very large site, access to river transport, or because they generate frequent vehicle movements. On top of this, relocation always has costs, and these vary hugely depending on the activity.

***Generally, the Mayor of London and boroughs have strong powers to retain industrial land through the planning system. But the high levels of industrial land release in the past decade suggest that overall, London boroughs and the Mayor of London have not used their powers to protect industrial land as much as they could have.***

Some specific types of designation do exist, but they are very limited. Wharves are protected under national legislation, and national government currently directs London boroughs to consult the Mayor of London (and follow their direction) to remove protection from wharves. London’s waste sites are safeguarded in the London Plan: Policy SI 9 requires that there should be no net loss of waste site capacity within London, and developments that result in loss of waste site capacity will have to re-provide this capacity elsewhere within London.

The very different activities taking place on industrial land call for different levels of planning protection, based on criteria such as criticality and neighbourliness, rather than the current all-or-nothing approach. The shortage of industrial land means that there are more instances of industrial land values overtaking housing land values: therefore housing need is no longer a driver of the loss of industrial land. In these cases boroughs should look at designation flexibly, so they can deliver on both their housing and industrial land needs. A more calibrated approach to protection would open up opportunities to mix uses or provide new industrial accommodation through development. Section 5 on co-location (below) explores how policymakers can ensure this is done well.

#### **Development criteria**

Industrial land can also be protected through planning policy. The Mayor of London has the power to set specific conditions for developments that take away industrial land. The London Plan 2021 uses this power in at least two ways. The Plan has raised affordable housing requirements for housing developments taking place on industrial land to 50 per cent of the new units,

compared to the 35 per cent generally required. For developments on non-designated industrial land, the Plan also requires developers to demonstrate that “there is no reasonable prospect of the site being used for the industrial and related purposes”, unless industrial floorspace is being provided as part of the redevelopment. To prove that the site is no longer suitable for an industrial use, developers must provide, among other things, “evidence of vacancy and marketing with appropriate lease terms and at market rates suitable for the type, use and size for at least 12 months”, as well as evidence that an offer was made to create modern industrial premises.<sup>44</sup> The benefits of setting development criteria is that they offer some protection to non-designated industrial land, such as small industrial units in very mixed areas. The downside is that they are rather generic and don’t take into consideration the specificities of a site and its occupiers.

The powers of the Mayor and the boroughs to protect industrial land are comprehensive, but they are constrained by national planning policy and Permitted Development Rights (PDR). PDR and the new Use Class E have created some uncertainty as to how widely these development criteria will apply. Indeed, PDR allows development to take place without planning permission, provided it meets certain design rules. Since PDR applies to the new Class E, light industrial activities now included in Class E could be converted to housing without planning permission, or the restrictions described above. Boroughs can seek exemptions to PDR for a specific site or parts of the borough, under so-called Article 4 directions, if they feel PDR would be prejudicial to “proper planning in their area”. Boroughs have recently introduced Article 4 directions for some of their industrial estates to ensure they don’t lose industrial land through permitted development. Nevertheless, changes to national policy have introduced some uncertainty over how far the Secretary of State will support boroughs’ Article 4 directions. Introducing Article 4 directions can also be costly, as they require robust evidence to support their designation. Their often “non-immediate” status to remove risk compensation can also undermine their impact.

### ***Recommendations***

- **Boroughs should take more responsibility for their industrial land policy in order to reflect their local circumstances.** Boroughs will have particular needs when it comes to industrial land, and the Mayor of London will need to give boroughs a degree of freedom to set their own industrial land policy. But each borough will also need to meet its own requirements for industrial land, and have an appropriate process to deal with this. The Mayor’s strategic role remains crucial, and they should continue to issue strategic guidelines for protection and release of industrial land.
- **National government should ensure that boroughs have the freedom to set different levels of protective designation for industrial floorspace.** Designation should be more granular to reflect the vastly different types of activity taking place on industrial land. The Mayor of London should continue to safeguard critical infrastructure such as waste sites and wharves.
- **National government should limit the scope of Permitted Development Rights where they may result in loss of industrial premises or compromise effective operation of industrial space.** Meanwhile, boroughs should continue to protect their existing industrial sites from conversion to housing through Permitted Development Rights, to prevent industrial space from being depleted “through the back door”.
- **Boroughs should ensure that new Class E premises meet the needs of light industrial activities.**

## 4. Make better use of existing land

In the face of dwindling supply, a key concern for London will be to prevent further loss of its remaining industrial floorspace. However, with its high housing targets and dense population, an urban metropolis like London will inevitably face pressures to use scarce land more intelligently and intensively. One solution is to build upwards to create additional floorspace.

The London Plan's Policy E7 on industrial intensification, co-location and substitution encourages denser use of industrial land. Intensification can take different forms, including bringing in small units and basements. Not all of them are highly costly or require substantial redevelopment, and some can involve businesses improving or adapting the way they use their space. Technical guides such as the [Industrial Intensification and Co-location Study](#),<sup>45</sup> [Industrial Intensification Primer](#),<sup>46</sup> and the [Old Oak and Park Royal Development Corporation \(OPDC\) Land Review](#)<sup>47</sup> provide examples of the different forms intensification could take and how it could work in practice for different typologies.

There are certain sectors where building upwards is becoming unavoidable and even desirable. The logistics industry is facing rapid changes as shopping online becomes the norm and consumers expect to receive their packages rapidly and at a low cost. Meeting this demand is pushing logistics companies to seek out smaller industrial sites and warehouses closer to residents and with good transport links. However, with industrial land in short supply and land values at an all-time high, doing so is increasingly challenging. Intensification is a potential solution to this quandary, bypassing the need to secure new sites by increasing the floorspace capacity of existing developments.

Intensification has proved successful in other cities where land is at a premium. In Asian cities like Hong Kong, Singapore and Tokyo, high population densities and a scarcity of industrial land have created the conditions for multi-storey logistics facilities to become well established and more cost effective.<sup>48</sup> While there are other examples of intensification, London has been comparatively slow in bringing forward multi-storey development. The X2 two-storey warehouse at Heathrow, which was completed in 2008, is London's only such example of an existing multi-storey development. More examples are coming soon, such as the three-floor logistics warehouse at the G Park London Docklands site in Silvertown, and the Industria stacked development in Barking and Dagenham – a non-logistics multi-storey development that will provide a range of flexible light industrial units. Industria was supported by public investment to meet the high costs of a flexible multi-tenancy development, receiving £33 million from Barking and Dagenham Council and £1 million from the Mayor of London's Good Growth Fund.<sup>49</sup>

It's clear that public sector investment by local authorities and the GLA creates the conditions for more sites to be brought forward for intensification. These examples of multi-storey developments in London are setting precedents and increasing market confidence in the viability of these



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➤ The Industria stacked development in Barking and Dagenham

developments. Not only do these new developments set an example for landowners and developers, they also help overcome occupiers' scepticism about the ability of intensified spaces to meet their needs.

Nonetheless, while intensification is an innovative and increasingly necessary way of addressing London's industrial accommodation capacity issue, it shouldn't be seen as a "silver bullet" policy. Intensification won't work for all types of industrial activities, occupiers and spaces. Where intensification seeks to bring together multiple occupiers on a redeveloped site, different operational requirements relating to operating hours, servicing and yard space may make multi-storey developments impractical for some businesses.<sup>50</sup> Cost is another key barrier. Large multi-storey developments are expensive to build, especially if they require access ramps for delivery vehicles, and development costs are borne upfront by developers. To make up for the additional cost, multi-storey structures are currently only viable in places where these costs can be offset by higher rental values.<sup>51</sup> This means that while multi-storey buildings create new industrial floorspace, they are likely to be unaffordable for a range of future tenants. Additionally, some landowners may be reluctant to undergo redevelopment, especially when faced with additional costs such as temporarily transferring existing occupiers who may not be able to return.<sup>52</sup> Pressures to unlock more floorspace capacity on limited land will nevertheless encourage landowners to bring multi-storey schemes into being in appropriate places.

### ***Recommendations***

Intensification is needed to provide additional industrial capacity, but it will not work for all industrial users, and it will need the right conditions to be workable and affordable. To boost intensification, we recommend that:

- **The Mayor of London should create an Industrial Space Investment Fund to co-invest in developments that provide stacked industrial floorspace.** City Hall has ringfenced a portion of the GLA's Land Fund for industrial projects, but only for a time-limited period. The Mayor should boost the availability of funding for industrial development. The public sector also has the potential to be a trailblazer by maximising opportunities for intensification and setting the conditions for redeveloped sites to become a viable and desirable solution – for example, by investing in infrastructure to support activities taking place on industrial land.
- **The Mayor of London should provide case studies of different examples of intensified land and spaces.** These should include information about the cost and location of the development, its yield, any changes in the occupiers using the spaces, and the experience of current occupiers.
- **The Mayor of London and boroughs should identify opportunities for intensification of industrial floorspace on land that they own.**
- **National government should help local authorities to incentivise intensification** – for example, through business rates policy. This could include introducing business rates relief for multi-storey businesses (at a cost to local authorities). Local authorities and developers should also explore whether other appropriate incentives can be offered to businesses.
- Through the Industrial Land Business Group, **industrial land users and occupiers should trade their knowledge and experience of the different ways to intensify floorspace.** Intensification includes not only the development of new sites, but also the more efficient and intensive use of existing spaces through new forms of technology. The Group should also facilitate dialogues between occupiers and developers to understand how to bring forward successful schemes.

## 5. Make co-location work

“We need to stop thinking about industrial land as places that are full of anti-social uses... and work with landowners and land users to reimagine and create a better public realm.”

**Director, sustainability consultancy**

“The biggest challenge is perception. The old use class order didn’t help and was too restrictive. The word ‘industrial’ gets associated detrimentally with being bad for residential. Once you understand what uses can be and show how they can be integrated they become more palatable.”

**Director, architectural practice**

Due to the scale, requirements and impact of certain industrial activities, it’s important that their spaces are safeguarded from other uses. However, there is also scope to mix industrial spaces with other types of development. We know that some industrial businesses value proximity to residential or office space, for example to reduce delivery and servicing costs. This could create industrial accommodation in places where there was none previously – or ensure that industrial land redeveloped into other uses retains industrial floorspace. Perhaps unintentionally, London already has experience of industry living organically side-by-side with other uses and within London’s neighbourhoods – whether it’s the motor repair firms operating under railway arches next to a cluster of homes, or the bakeries and breweries scattered along high streets and local town centres.

Co-location and mixed-use developments also offer a way to knit residential developments and more “neighbourly” industrial activities together – whether by housing the two in the same development vertically, or bringing them into closer proximity horizontally. Mixed-use developments do not have to be restricted to the integration of industry with homes: they can also involve industrial activities being incorporated alongside offices and retail. Finding a way to successfully integrate and maintain industrial accommodation within neighbourhoods also has other benefits, such as supporting high streets and boosting local employment. Yet the role that industrial spaces play in the recovery is often under-considered. For example, the economic recovery missions of the GLA and London Councils include a commitment to developing thriving neighbourhoods, supporting businesses and investing in innovation,<sup>53</sup> but their framework does not consider how bringing light industrial spaces into high streets and town centres can lead to the growth of activities that are attractive to residents.

Local authority policies are already setting precedents for co-location and mixed use, but there are issues with the quality of some schemes. An industrial land and logistics agent that we spoke with expressed concerns over residential developers who, when tasked with putting back industrial and employment floorspace, end up creating poorly designed spaces that are ill-suited to the operational needs of industrial users. Developers, eager to gain access to land, may bring forward mixed-use schemes with light industrial uses without sufficiently considering operational needs such as vehicle movements and physical fitting requirements.

## Case study: Logistics hotels in Paris

Like other cities around the world, Paris is reckoning with an explosion in deliveries as more and more people shop online. In 2019, the Paris region had about 600,000 parcel deliveries made directly to customers daily, increasing to 900,000 in 2020.<sup>56</sup> As Paris faces pressure to meet swelling demand for goods that arrive quickly and cheaply to people's front doors, the city is forced to think creatively about locating distribution centres within its boundary rather than on its periphery.

One innovative solution being explored is the development of "logistics hotels" – mixed-use developments used primarily for deliveries but located within neighbourhoods. One of the most recognised logistics hotels is Chapelle International, located in the 18th district of Paris on an abandoned railway. The mixed-use development became fully operational in June 2018 and comprises 10,000 square metres of office space, a data centre, sport and leisure facilities, and an urban farm on its rooftop.<sup>57</sup> A neighbouring development on the east side of the site will also host 900 homes. Chapelle International was developed by Sogaris, a logistics real estate developer and manager partially owned by the City of Paris; the project has other partners including Société

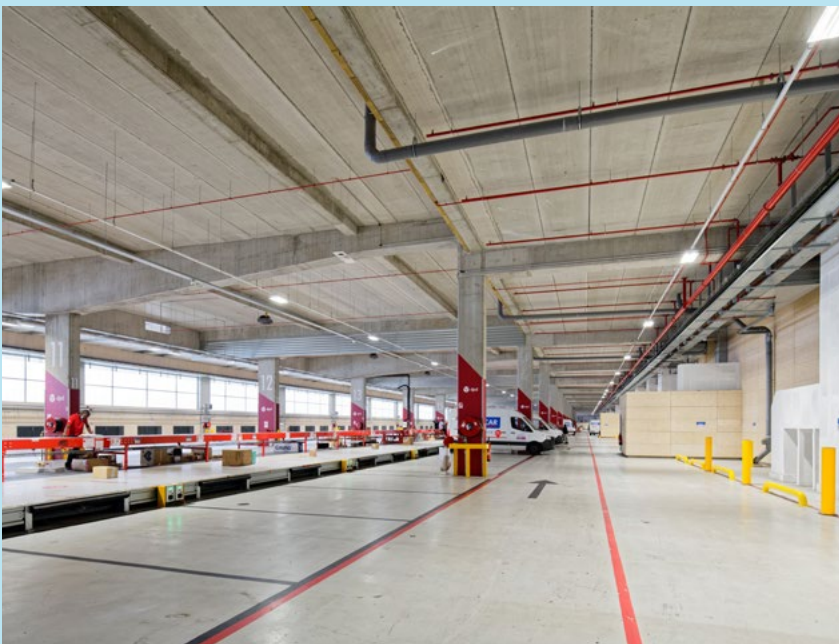
Nationale des Chemins de Fer Français (SNCF), France's national railway, and third-party logistics companies such as XPO Logistics and Eurorail.

Chapelle International has certain advantages over more traditional types of distribution centre. First, the name dispels the sometimes-alienating language of industrial activities and is immediately more attractive to residents. The central location also allows logistics to become a more visible feature of the city's environment and encourages interesting and attractive designs. Additionally, by enabling several activities to happen in one development, the hotel has generated higher revenues than logistics tends to bring.<sup>58</sup>

The development hasn't been without challenges, however. A long journey began in 2010 that required the developers to undergo several administrative processes, including a 19-month wait to obtain a building permit and a further year to receive a special agreement for large industrial spaces.<sup>59</sup> La Chapelle also required substantial investment from Sogaris, which is not expected to see returns on the project for 20 to 25 years.



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➤ Chapelle International

In some cases, ground floor areas reserved for light industrial are instead occupied by retail stores, cafés or other types of employment, rather than industry-related workspaces and urban warehousing.<sup>54</sup> Residential developers often lack the expertise to build flexible industrial premises appropriate for different users. They are also less likely to involve an expert management partner who can then take the industrial units on and find the right occupiers – meaning that industrial spaces are more likely to go underused or abandoned.

Industrial land occupiers are also worried that that co-location with other uses may compromise their ability to operate. The London Plan has introduced policy tools to prioritise the needs of existing occupiers against new developments, so that existing industrial operations are not undermined. The Agent of Change principle requires developers who want to build homes next to (or on) an industrial site to take responsibility for insulating residents from the impacts of operations already taking place there (such as noise and pollution).<sup>55</sup> While the Agent of Change principle is a useful policy tool, it is only applicable to pre-existing industrial operations.

Like intensification, co-location won't work for all types of industrial operations and spaces, particularly strategic functions like waste management and construction. In cases where co-location does work, it will require careful and innovative design that does not compromise on flexibility for current and future occupiers.

### ***Recommendations***

London will need to provide further industrial accommodation through well-designed co-location schemes. To do this successfully, we recommend the following:

- **The Mayor of London and the boroughs should consider subsidising developments that provide new industrial floorspace in locations where none currently exists.** This is especially useful where it unlocks co-located developments that would otherwise be unviable.
- **The Mayor of London should provide a set of principles and case studies for how co-location can work operationally.** These principles and case studies should move beyond architectural examples: they should show what uses work well in co-location, how to build flexible accommodation, and how co-location can be effectively managed. Co-location also opens up issues around mortgageability, building insurance and the general operation of space: the mayoral guide needs to address these if the potential of co-location is to be realised.
- **Boroughs should require that industrial floorspace provided as part of development proposals is suitable for a range of industrial activities.** Local authorities should require developers to provide sufficient evidence that the designated space is suitable for the current and future needs of different businesses and industrial activities.
- **Residential developers designing mixed-use developments should work with The Industrial Business Land Group to build knowledge about the needs of different businesses when operating close to residents.**

## 6. Enhance strategic planning

“There was renewed enthusiasm that [industrial sectors] at least had GLA support. The first Draft London Plan provided policies to protect industrial land and pushed innovative ideas such as supporting multi-storey, co-location. Though there was still some scepticism about how deliverable they were, the sector welcomed a more supportive attitude from the GLA; then national government stepped in and watered down these changes.”

**Director of Planning, business membership group**

Improved understanding of the need for industrial land – and better intelligence from the industrial land market – will help improve strategic planning. However, producing the London Plan is a lengthy process taking around four years. The London Plan 2021 was also delayed by political intervention, including the Secretary of State requiring the removal of the “No Net Loss of industrial land” policy on the grounds that this would be counterproductive to housing target delivery – even though the London Plan is responsible for protecting employment land as well as planning to meet London’s housing needs. As well as delaying the process, this type of interference risks diminishing the power of the Mayor of London to oversee strategic planning for the city.

Planning policy reviews are also few and far between. As mentioned, the London Plan has at least a four-year cycle, and Borough Plans are generally required to be reviewed every five years. This means planning policy is often outdated by the time it is published. However, both the Mayor and the boroughs can update the interpretation of policy more frequently by issuing Supplementary Planning Guidance.

### ***Recommendations***

1. To ensure the London Plan is more reactive to London’s interests, **the GLA and its planners should have as much power as possible to devise the city’s land use strategy.** The government’s role in approving the London Plan should be limited in scope to a few specific considerations directly impacting on the national interest. This would also give national government more capacity to respond to pressures elsewhere in the UK.

Improving strategic planning within London will not in itself be sufficient to address the city’s industrial land shortage. London is not an island, and its economy operates as one with that of the Wider South East. The shortage of industrial accommodation is at its most severe in the inner city, but pressures have reached far into outer London and are also felt by industrial businesses that service London’s economy from beyond the M25.

In the 2000s, national government experimented with regional planning to join up strategies across London and the Wider South East. This created three planning regions – London, the South East, and East of England – which were due to work together to coordinate planning. These institutions were scrapped in 2010 and subsequently replaced by a “Duty to Cooperate”. This requires local authorities to include the opinion of neighbouring authorities upon reviewing their local plans. While the Duty to Cooperate has a laudable aim, it has been criticised for not promoting genuine strategic collaboration across local authority

lines. The London Plan is also exempt from this duty, further diluting the potential for London's needs to be effectively planned for across the Wider South East. This means that local authorities can allow reductions of industrial floorspace without necessarily taking into account the impact on their neighbours. The Duty was due to be scrapped in the government's upcoming planning reform, and at the time of writing there is uncertainty and a lack of clarity on how cross-border strategic planning issues will be effectively addressed going forward.

The lack of strategic planning for industrial capacity across the Wider South East also means that there are missed opportunities in terms of infrastructure planning and investment. For example, there are large pockets of industrial land near London that may not currently be in use because they are not well connected to the capital, or because workers struggle to get there. Identifying these opportunities and making the case for government investment in infrastructure would mean new industrial businesses could settle there and still service London's economy. London's neighbouring authorities would see increases in employment while also reducing pressure on London's industrial floorspace – a clear win-win for all parties.

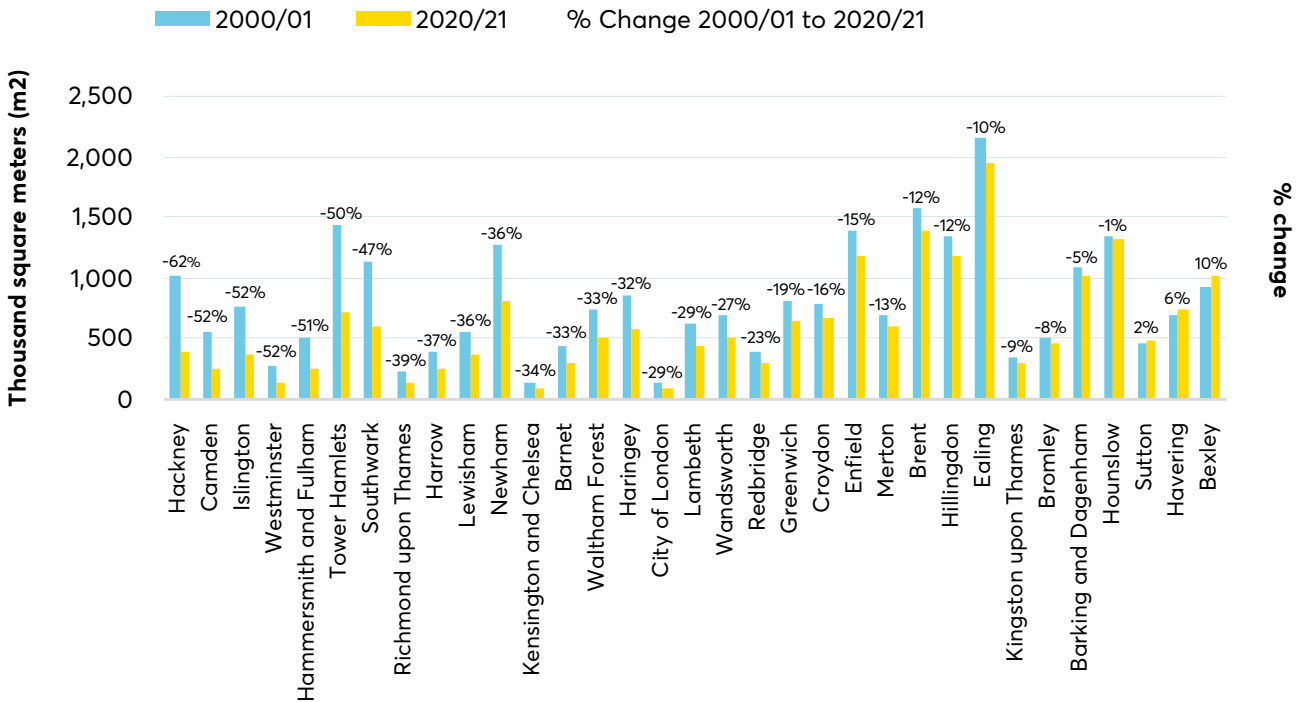
2. To bring forward space for industrial innovation:

- a) **The National Infrastructure Commission should work with London and neighbouring authorities to identify how infrastructure investment could increase the supply of suitable industrial land in the Wider South East.**
- b) **National government should invest in infrastructure that will unlock additional industrial floorspace in the Wider South East, thereby helping to counterbalance industrial land loss in London.**

All aspects of London's economy today, and tomorrow, are dependent on the activities that take place on industrial land. We ignore it at our peril. If we fail to address the pressures we have set out in this report we risk throttling the supply of industrial accommodation, raising costs for all (including consumers), pushing innovation and talent away from the city, and hindering our battles on multiple environmental fronts. Without sufficient industrial land, London will be a weaker city. However, with a stronger voice for industry, more data-driven insight, improved planning, intensification where it makes sense, and reforms to public powers, we may yet sow the seeds of future success and economic recovery for the whole of London.

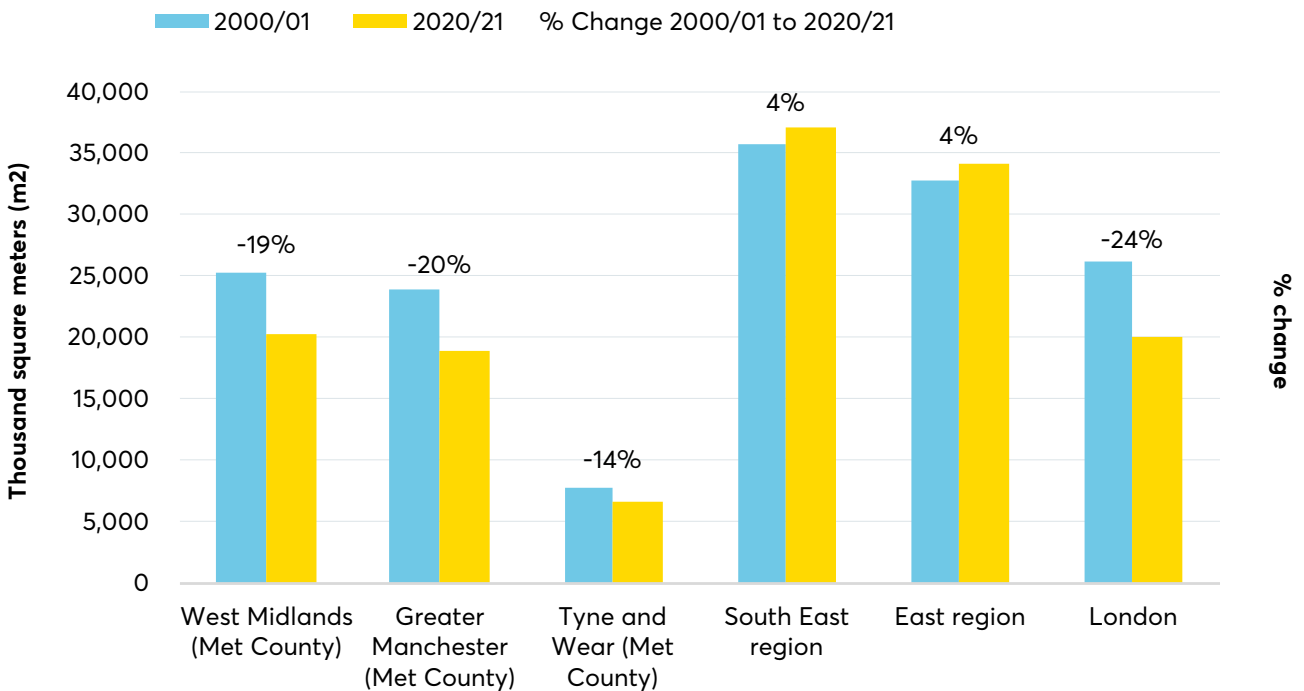
# Appendix

**Figure 4: Industrial floorspace in 2000/01 and 2020/21**



Source: VOA (2021). Non-Domestic Rates, Table FS4.1: Industrial sector - total floorspace by administrative area, data to 31 March 2021.<sup>60</sup>

**Figure 5: Industrial floorspace in 2000/01 and 2020/21, selected counties and regions**



Source: VOA (2021). Non-Domestic Rates, Table FS4.1: Industrial sector - total floorspace by administrative area, data to 31 March 2021.<sup>60</sup>

Other UK cities have also released industrial floorspace in the last two decades - though the release was greater in London. There has been a small increase in industrial floorspace in rest of the Wider South East but that does not compensate London’s loss in floorspace nor in value, as London needs industrial land within its boundaries to function.

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