

RAPLEYS

Hearing Statement for
LaSalle Investment Management

LEGACY CORPORATION LOCAL PLAN REVIEW EXAMINATION - MATTER 13

8 August 2019

Our Ref: MJB/17-00954

Contents

1	Introduction	1
2	Matter 13: Sub Area 4.....	1
3	Conclusion	2

Appendices

Appendix 1 Site Location Plan

1 INTRODUCTION

1.1 This Hearing Statement has been prepared by Rapleys LLP on behalf of LaSalle Investment Management ('LaSalle') and addresses Matter 13 Sub Area 4 Policy SA4.5 (Bow Goods Yard).

1.2 This statement follows on from LaSalle's previous representations submitted to the Plan's Regulation 19 Consultation in December 2018.

1.1 LaSalle manages Old Ford Trading Estate and Maverton Road Trading Estate ('the Trading Estates'), Fish Island in Bow, on behalf of their landowners (see Site Location Plan at **Appendix 1**). The Trading Estates are located in a longstanding established industrial area which is a designated Strategic Industrial Location ('SIL'). The Trading Estates adjoins the mixed use development site under Site Allocation SA4.5, which includes the introduction of residential use. As such, our client wishes ensure that the Local Plan Review robustly protects and safeguards the operation and function of the Trading Estates as a SIL and that their ability to continue to operate and grow will not be undermined by the development of further non-industrial use(s).

2 MATTER 13: SUB AREA 4

13.1 Is Site Allocation SA 4.5 (Bow Goods Yard (Bow East and West)), justified, effective and consistent with national policy and the relevant policies in the London Plan.

2.1 On this matter, we respond on the following specific issues relative to SA4.5:

i) Meeting the overall needs of the LLDC area, and

iii) Impact on the living conditions of existing and/or future residents/occupiers.

2.2 As stated in our previous representations, LaSalle agrees with one of the requirements that non-SIL uses proposed are required to demonstrate an acceptable relationship between the rail and other SIL uses by applying the 'Agent of Change' principle. However, the policy is ambiguous as the requirement could be interpreted as demonstrating an acceptable relationship between SIL and non-SIL uses within the allocation. As we stated in our Hearing Statement for Matter 4, we consider that a robust protection of the existing and retained Fish Island South SIL is necessary in order to ensure that it can meet the needs of the industrial sector's requirements and London's industrial land demand.

2.3 In this regard, it is imperative that the nature and requirements of Classes B2/B8 sector operators are clearly recognised and addressed, particularly the need for delivery and access on a 24 hour and 7 day a week basis. Class B2 Heavy industrial operations, by nature, generate noise, which is why it is distinguished from Class B1c industrial use appropriate in residential area.

2.4 As such, for the soundness of the Plan, we consider it necessary that the following changes are made to SA4.5.

"Demonstrates an acceptable relationship between the rail and other SIL uses both within the site and the wider Fish Island South Employment Cluster SIL and any non-SIL uses proposed, including noise, air quality and visual impact, applying the 'Agent of Change' principle, so as not to compromise operational requirements of Classes B2/B8 relative to noise generation and 24hour/7day a week operation and delivery requirements".

Supporting development principles - ***"Ensure that any non SIL uses do not compromise the function, access and overall operation of ongoing industrial uses in the vicinity, particularly their ability to operate without undue restriction on noise generation and***

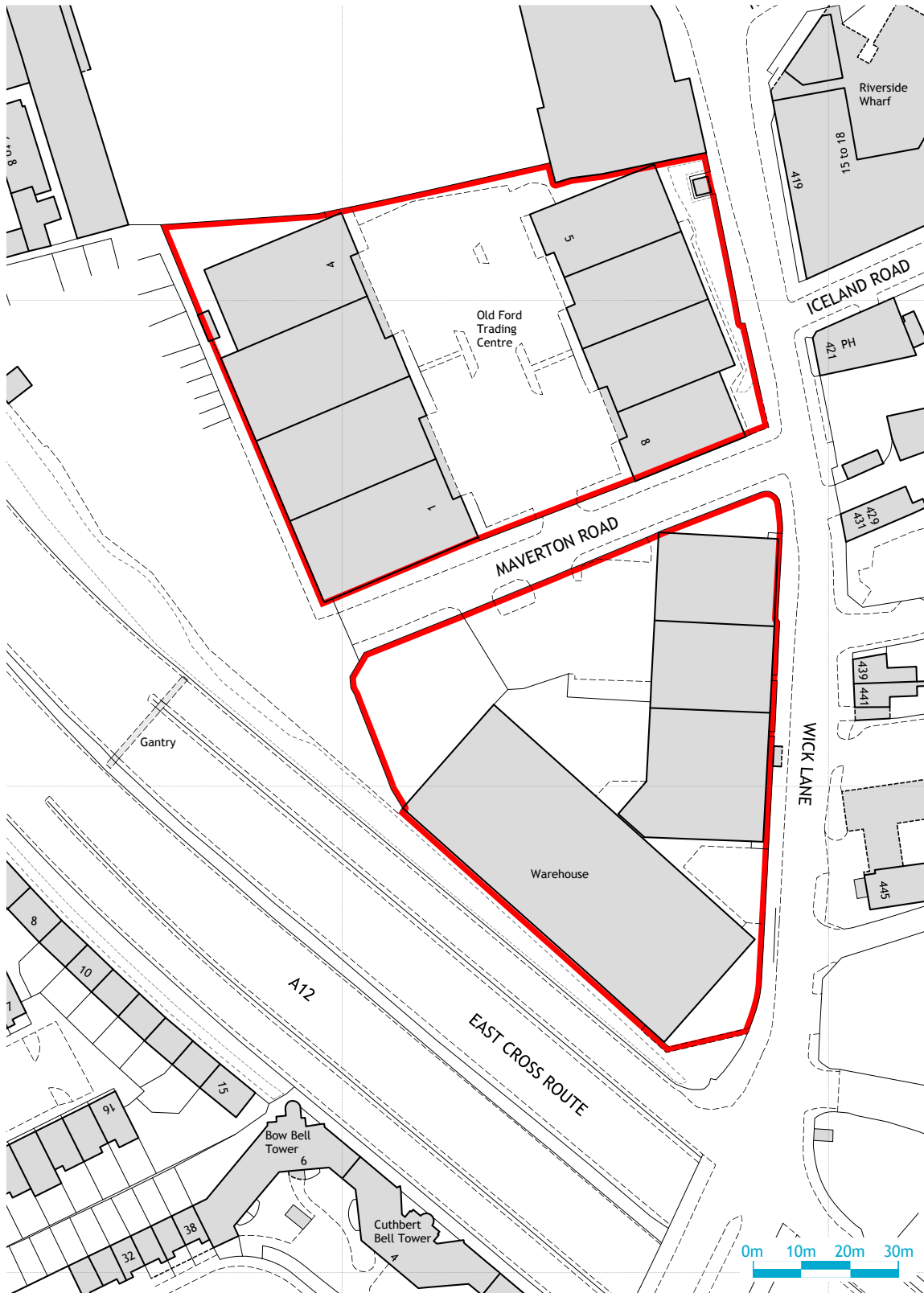
24hour/7day a week operational/delivery requirements. Any environmentally sensitive non-SIL related uses should demonstrate that their location and design of the development and effective mitigation measures will protect and safeguard B2/B8 operations and the function of the Fish Island South Cluster SIL.”

3 CONCLUSION

- 3.1 Site Allocation SA4.5 is not sound as it does not robustly protect the operation and function of Fish Island South Cluster SIL, as the wording of the requirement relative to the “Agent of Change” principle is ambiguous. We consider that our suggested change is necessary having regard to the strategic importance of SILs and the Framework Paragraph 16 which requires that Local Plans should contain policies that are clearly written and unambiguous.

Appendix 01

SITE LOCATION PLAN



SITE LOCATION PLAN
 Old Ford Trading Estate
 Maverton Road
 BOW E3 2JE



Scale @ A4 : 1:1250
 Plan No. : 17-00954_SLP03



rapleys.com
 0370 777 6292

This map is for identification purposes only and should not be relied upon for accuracy.
 © Crown copyright and database rights 2018. OS Licence No. 100004619

LONDON
 BIRMINGHAM
 BRISTOL
 EDINBURGH
 HUNTINGDON
 MANCHESTER