

# Employment Land Technical Paper

Updated following publication of the (Reg 19) Draft Local Plan

Setting a baseline and hierarchy for the local plan

## Introduction and purpose

- 1.1. This technical paper sets out the methodology for creating a baseline position of designated employment land in Bexley. The methodology has been reviewed by the Greater London Authority, and is considered robust for setting the industrial land baseline for the borough. This is then applied and the baseline position used to inform the preparation of Bexley's new local plan, to ensure that industrial capacity is appropriately managed. It is the review of a local plan that creates the opportunity to assess and propose changes to land use designations within the local planning authority area.
- 1.2. The employment land baseline has informed assessments that determine the amount of jobs growth over the Draft Local Plan period and the amount of employment land required. Bexley's Industrial Land Intensification Study, produced by the Council, and the Employment Land Review and accompanying Technical Briefing Paper (both prepared by Lichfields) provide these assessments.
- 1.3. The findings from these key evidence base documents have helped to shape Draft Local Plan policies that seek opportunities to optimise industrial and other employment sites, including in town centres, and have identified surplus capacity that has facilitated the limited release of industrial land for housing and/or other uses. In addition, sites have been assessed to consider changes to sites within the industrial designation hierarchy, which consists of strategic industrial locations (SIL), locally significant industrial sites (LSIS) and undesignated industrial sites.
- 1.4. The final position of industrial land is summarised in [Table 1](#) of Appendix A to this technical paper and illustrated by [Figure 1](#). This map is also included in the Draft Local Plan as Figure 3.
- 1.5. Final land-use designations are shown on the [submission policies map](#), with further information set out in the Submission Policies Map Technical Paper.
- 1.6. Sites released from industrial designations and allocated for residential development are included in Part 2 of the Draft Local Plan, where site allocations have been prepared. The Site Allocations Technical Paper provides additional information, including assessments of the sites.

## Background and context

- 1.7. Bexley's designated employment land was last fully reviewed in the preparation of the Unitary Development Plan (UDP) and UDP Proposals Map, in 2002. That document was adopted in April 2004 as the borough's Development Plan, alongside the first London Plan.
- 1.8. The UDP set out the hierarchy of designated employment land, which were Primary Employment Areas, Secondary Employment Areas, Special Industrial Zones and Preferred Office Locations (which included the five main town centres). Specific UDP policies, mainly in the Employment and economic activity and Thames-side chapters provided development management criteria and site

specific requirements. Appendix I quantified the business land provision and Appendix J provided information on the additional uses for the Special Industrial Zones.

- 1.9. The London Plan 2004 created the designation of Strategic Employment Locations across London, based on two types of location: Industrial Business Parks and Preferred Industrial Locations. The London Plan however, as a spatial development strategy, acknowledged that the boundaries of these areas would need refining through sub-regional development frameworks and specified in London boroughs' UDPs, as planning legislation requires that land uses for development be designated by local planning authorities for their areas as part of the preparation of a local plan.
- 1.10. The Mayor's indicative Strategic Employment Locations in the main matched Bexley's Primary Employment Areas, with several notable exceptions. It was agreed however for the purposes of policy compliance that Bexley's designated Primary Employment Areas would be policy compliant with the London Plan's policies on Strategic Employment Land irrespective of the GLA's indicative map and list of locations, and Primary Employment Areas on the UDP Proposals Map are the legally designated areas.
- 1.11. In 2007 the Secretary of State (ODPM), acting on the requirements of the Planning and Compulsory Purchase Act 2004, reviewed Bexley's UDP policies to determine if any should be saved. From this process, many policies were allowed to expire after 27 September 2007, including the Special Industrial Zone land-use designation. Whilst much of the SIZ designation had been combined with the Primary Employment Areas designation, this was not the case for the Crossness Sewage Treatment Works along the River Thames in Belvedere, where an area of undesignated land was created by the policy vacuum when the policy expired.
- 1.12. In July 2011 the Mayor of London published the replacement London Plan, and in February 2012 the Bexley Core Strategy was adopted. Both these documents confirmed that Bexley was one of a small number of boroughs in East London where a managed transfer of employment land should take place. The London Plan 2011 noted that boroughs in this category typically had a greater supply of vacant industrial sites relative to demand and should generally adopt a rigorous but sensitively managed approach to transfer. Redevelopment of surplus industrial land was to address strategic and local objectives particularly for housing, and for social infrastructure such as education, emergency services and community activities.
- 1.13. The Bexley Core Strategy, based on evidence underpinning the document and the London Plan policy for a managed transfer of land, committed to a release of 50 hectares of employment land over its Plan period. However, the Core Strategy did not replace the UDP Proposals Map; remaining saved UDP policies and the UDP Proposals Map became part of the adopted local plan when the Core Strategy was adopted in February 2012. Therefore, when considering the amount of employment land released in line with policy, the starting point was the amount of designated land defined on the UDP Proposals Map and the information provided in Appendix I of the UDP.

## **Employment land review methodology**

- 1.14. The review of the Bexley Local Plan 2012 began in 2017 shortly after work had begun on a new London Plan. Through discussions, GLA and Council officers came to a common understanding of the methodology to determining Bexley's industrial land baseline and agreeing that 31 March 2017 would be the date from which the baseline would be taken. This was the baseline date for much of the evidence supporting the new London Plan, and similarly for some of the evidence underpinning Bexley's new local plan.

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- 1.15. All employment land released prior to this date through planning consents, whether implemented or not, would change to its approved land use (unless planning conditions stated otherwise). Existing or proposed changes after this date would need to be considered as part of the assessment of employment land following the setting of the baseline, whilst recognising that it was still the current policy position for a managed transfer of employment land to other uses.
- 1.16. However, consideration has been given to the date of the industrial land baseline, following representations received on the Draft Local Plan (Reg 19 document) that the date of the baseline position should be more up-to-date. Since the original 2017 baseline was set, the Secretary of State published a letter sent to the Mayor regarding the Intend to Publish London Plan following its publication, which lead to the adopted London Plan changing its approach to the retention of Industrial Land by removing the principle of no net loss. This gave London boroughs greater autonomy in reviewing industrial land in their local plans.
- 1.17. The Council has therefore determined that it would be more appropriate to set a baseline date of 31 March 2020 for its industrial land baseline position and to consider implemented planning decisions only. Change of use from office to residential in SIL through permitted development rights (PDR) is still considered to be inappropriate development and changes to the industrial land designation will be assessed on a site-by-site basis with the industrial function of SIL the primary consideration in this assessment (see paragraph 1.25).
- 1.18. The baseline review process began with a rationalisation of the UDP Proposals Map. It was originally produced by hand and then was digitally printed onto an Ordnance Survey master map at a scale of 1:10,000 (at A0 paper size) as the level of accuracy would not permit a larger scale. The Proposals Map has remained at this scale, even when viewing it from the Council's website. As part of the production of a new local plan, the submission policies map has been produced entirely in GIS in an online, interactive format, allowing for land-use designations to be drawn with greater accuracy. Factual corrections have been made in the transfer to the new format (when redrawing the original UDP GIS shape files to align with an up-to-date base map), and this has led to an update of the amount of land, in hectares, for each land-use designation. The Submission Policies Map Technical Paper provides further detail in this regard.
- 1.19. Therefore, the gross areas for designated employment land in the borough have been adjusted and this is detailed in Appendix 2. As well as minor changes to reflect the most up-to-date GIS base map, there has been the removal of areas not related to employment uses, such as Green Belt, MOL and Urban Open Space, as well as two designated travellers sites, and highways land not part of industrial areas or estates. In the main this had led to a reduction in designated industrial land, although in some industrial areas the amount of designated industrial land has increased.
- 1.20. Further, the UDP had identified the loss of employment land to other uses, mainly for residential or retail warehousing, but this had not been reflected on the UDP Proposals Map. This information is set out in UDP chapters 7 and 12, (expired) UDP policy SHO3 and its justifying text, and Appendix I. Where appropriate, amendments have been made prior to setting the employment land baseline. All sites with implemented planning permissions on industrial land granting a change to a non-industrial use by 31 March 2020 have been removed prior to setting the baseline industrial area (except for implemented PDR changes of use from office to residential in SIL - see paragraphs 1.17 and 1.25).
- 1.21. The loss of UDP policy E13 (Special Industrial Zones) created another change that the baseline review had to account for. Crossness Sewage Treatment Works had never been designated as
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employment land, but the operational part of the site was a special industrial zone. With the expiry of UDP policy E13, the entire site became a combination of undesignated land, Metropolitan Open Land (MOL) and a conservation area.

- 1.22. The site was however recognised for its strategic utilities use by UDP policy TS17 which remained part of the Bexley Local Plan 2012. In addition, Thames Water has been enhancing and modernising the sewage treatment works in line with Government directives over the last 15-20 years and this means that more of the site is developed. Therefore, the operational land boundary has been reviewed and revised, the area of MOL within the operational boundary reduced where it no longer functions as MOL, and the original SIZ policy area, plus the newly developed areas have been designated as Strategic Industrial Land (SIL). For the purposes of setting a baseline, only the land that had been designated as a Special Industrial Zone was considered to be holding an industrial designation prior to 31 March 2017. All other additions to SIL are new (e.g. added after the baseline area has been defined).
- 1.23. What has not affected a change in the industrial land baseline are permitted development rights. In 2013 Government introduced a temporary permitted development right (PDR) to convert unused offices to residential housing and this was initially set to expire in May 2016 but was granted an extension and given permanent status in September 2020. Therefore, PDR has effectively rendered the Preferred Office Locations land-use designation irrelevant; however, with the exception of the Foots Cray Industrial Business Park, many of Bexley's office locations were located in town centres, not on designated industrial land.
- 1.24. More recent changes to PDR are likely to cause further losses of business premises, although at this time it is difficult to predict if changes to residential uses will come from non-designated industrial sites rather than from sites within designated industrial areas. At the last audit of employment sites by the GLA in 2015, approximately 7% of industrial businesses in the borough operate on non-designated industrial sites.
- 1.25. Any losses of office space or other business/commercial premises on designated industrial land through permitted development will not trigger a release of the industrial designation even though the use has changed. It would be counter-intuitive to carve holes in wider strategic industrial land for non-industrial uses. The loss of office space in designated employment areas, particularly in the Foots Cray Business Area, will need to be monitored for any negative impacts on the area's industrial function. The use of Article 4 Directions to remove permitted development rights in these areas is being considered. Further information on this approach is in the Article 4 Directions Technical Paper.

## **New SIL/LSIS designations and loss of SIL/LSIS from the baseline**

- 1.26. An agreement has also been reached between Council and GLA officers on industrial compensation principles for the limited release of SIL for other uses (primarily for housing). Opportunities for intensification of SIL have been addressed in the Industrial Land Intensification Study and this has provided additional capacity. A consideration has been given to substitute non-industrial sites (e.g. big box retail outside of town centre locations) by applying an industrial designation to them particularly where these are adjacent to SIL, where appropriate. The sites that have been assessed are the three sites set out in (expired) UDP policy SHO3:

- a. Tower Retail Park, Crayford

- b. Fraser Road (former Atlas Works), Erith
  - c. Land between the A20 and Watery Lane, Foots Cray
- 1.27. The assessment has concluded that Tower Retail Park would not be an appropriate site to be designated as SIL, as it has been included in a new town centre boundary for Crayford. In fact, it had been removed from its industrial designation when setting the employment baseline.
- 1.28. Fraser Road was designated in the UDP as a Primary Employment Area and a condition of the permission granting retail warehousing on the site stipulates that the site returns to industrial use if the retail warehouse were to cease activity. Therefore, this site already has an industrial designation, that had not been removed when setting the baseline, so the opportunity cannot be taken to add this as a new site.
- 1.29. The land between the A20 and Watery Lane in Foots Cray does however have potential for a new industrial designation. This site was part of the Foots Cray Business Area before being granted planning permission by the Council for a comprehensive redevelopment for non-food retail warehousing (see para. 9.40 of the UDP). A policy vacuum was created from the loss of UDP policy SHO3 in 2007 and the land became 'white land' (no designation). A SIL designation would allow the site to be redeveloped for business uses if the non-food retail warehousing use were to cease activity. The new industrial land use designation does not prevent the current uses on the site from remaining. Business uses in this part of the borough are considered to perform well and the rental and land values of industrial sites within Foots Cray are amongst the highest in the borough, with its good access to the strategic road network and good overall stock condition.
- 1.30. Where sites were removed from their industrial designation when setting the employment land baseline position or where residential site allocations are proposed, in some cases this has left areas of SIL that no longer function strategically. In these cases, the designation is proposed to change from SIL to LSIS. Remaining SIL at Slade Green Industrial Area falls into this group of sites, as well as SIL in Belvedere south of Bronze Age Way. Further, a vacant site adjacent to the Five Arches Business Centre in Foots Cray but entirely separate due to access, has been moved from its SIL designation to LSIS given the proximity of residential, education and town centre uses.
- 1.31. Some sites designated in the UDP as Primary Employment Land have not been included in the London Plan SIL designation. The gasholders and business units along Yarnton Way in Belvedere, and the trading estates of Europa, Fraser Road and Birch Walk in Erith fall into this type. These sites are proposed to change from SIL to LSIS with the exception of the gasholders site, which is proposed as a residential site allocation. These changes are mapped in [Figure 1](#), which is also included in the Draft Local Plan as Figure 3, revised post-Reg 19. Further information is provided in the Submission Policies Map Technical Paper, and final designations defined on the [submission policies map](#).
- 1.32. Appendix A to this technical paper sets out summary tables on proposed changes to industrial land. The final position of industrial land proposed in the Draft Local Plan is set out in [Table 1](#). Tables 2, 3 and 4 set out the baseline position of designated employment land at 31 March 2020, and Table 5 sets out land for release, additions to SIL, and changes in the hierarchy from SIL to LSIS. Table 6 is the final position table from the Draft Local Plan, with corrected figures post-Reg 19.
- 1.33. Appendix B to this technical paper sets out detailed site information.
- 1.34. It is considered that a justified industrial land baseline has been generated, which informs and is informed by the Industrial Land Intensification Study. The baseline position provides a sound basis for policy development, including the release of some industrial sites for housing, which are included

in the Draft Local Plan site allocations. In addition, the opportunity was taken as part of the local plan review to use corresponding land-use designation names to the London Plan: Primary Employment Areas have become Strategic Industrial Land (SIL); and Secondary Employment Areas Locally Significant Industrial Sites (LSIS) as the London Plan policies for each type of industrial land in its hierarchy apply equally to Bexley's hierarchy.

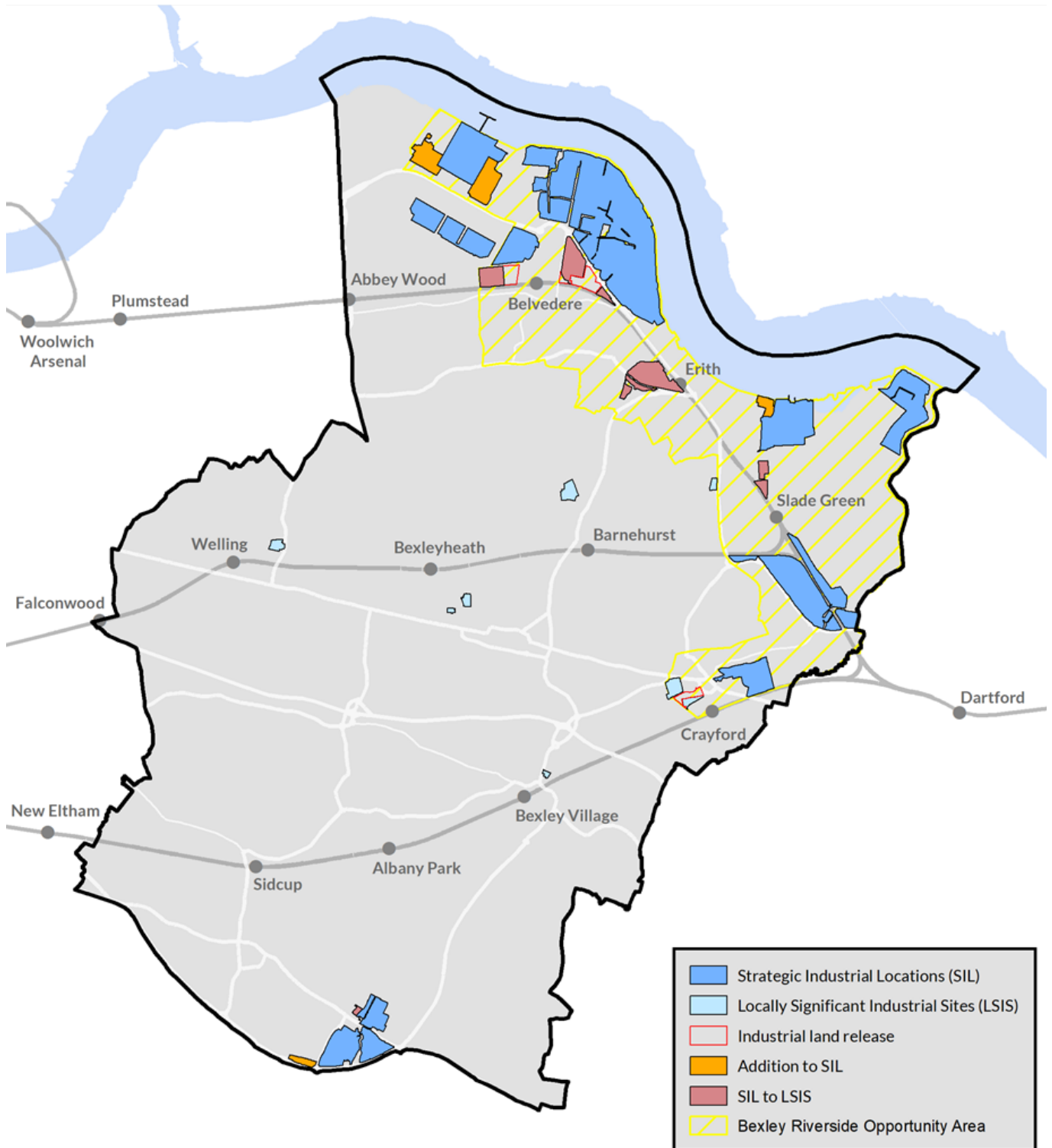


Figure 1: Bexley's proposed changes to industrial land

## Appendix A: Summary tables

Table 1: Summary of final position of designated industrial land, by type, once all Draft Local Plan proposals are taken into account (areas in hectares)

Industrial designation in hierarchy	baseline position at 31 March 2020	additions from undesignated industrial sites and white land	changes to industrial land hierarchy (removed from SIL and added to LSIS)	released from industrial designation for other uses (primarily residential and urban open space)	Final industrial land position
Strategic Industrial Land (SIL)	400.2512	+24.4491	-34.6784	-8.8747	381.1472
Locally Significant Industrial Sites (LSIS)	15.2077		+34.6784	-2.4260	49.8861
<b>Total designated industrial land</b>					<b>428.6073</b>
<b>Increase above baseline position</b>					<b>13.1485</b>

Table 2: baseline position of designated primary employment areas (SIL) at 31 March 2020 (all figures gross area in hectares)

Primary employment areas/ Strategic Industrial Locations	Site name	UDP Proposals Map (with factual corrections)	land use change at 31 March 2020	Local Plan SIL baseline
Belvedere Industrial Area	Belvedere Industrial Area, North of Bronze Age Way	147.3524		147.3524
	Crabtree Manorway Industrial Estate (South)	15.4505		15.4505
	Eastern Industrial Estate Extension, Waldrist Way	22.2859		22.2859
	Hailey Road Business Park	13.2538		13.2538
	Centurian Way	5.8488		5.8488
	SGN Gas Holders, Yarnton Way	3.4580		3.4580
	Norman Park, Norman Road and Picardy Manorway	4.8223	4.8223	
Crossness Sewage Treatment Works	Crossness Sewage Treatment Works (Special Industrial Zone)	28.0300		28.0300

Primary employment areas/ Strategic Industrial Locations	Site name	UDP Proposals Map (with factual corrections)	land use change at 31 March 2020	Local Plan SIL baseline
Crayford Ness, Thames Road and Crayford Industrial Areas	Darent Industrial Estate	26.1149		26.1149
	Thames Road Industrial Estate	46.9183		46.9183
	Crayford Industrial Area (whole area)	22.3274		14.4033
	Former Samas Roneo Site	part of the Crayford Industrial Area	4.6515	
	Tower Retail Park and Tower Park Road Industrial Estate	part of the Crayford Industrial Area	3.2727	
Erith Industrial Area/Estates and Slade Green Industrial Area	Europa Trading Estate	11.3877		11.3877
	Fraser Road/ Birch Walk (whole area)	3.1039		3.1039
	Manor Road Industrial Area	26.9170		25.5052
	Slade Green Industrial Area (whole area)	9.2076		3.6713
	Former Linpac Site	part of the Slade Green Industrial Area	5.5363	
Foots Cray Business Area	Five Arches Business Centre	9.5845		9.5845
	Foots Cray Business Area	22.7371		22.4710
	Progressive House	part of the Foots Cray Business Area	0.2661	
<b>totals</b>		<b>418.8000</b>	<b>18.5489</b>	<b>400.2512</b>

**Table 3: baseline position of designated secondary employment areas (LSIS) at 31 March 2020 (all figures gross area in hectares)**

Industrial area	UDP Proposals Map (with factual corrections)	approved release before 31 March 2020	Local Plan LSIS baseline
Bourne Industrial Park, Bourne Road, Crayford	3.2024		3.2024
British Bakeries, Belmont Road, Northumberland Heath	3.2236		3.2236



<b>Industrial area</b>	<b>UDP Proposals Map (with factual corrections)</b>	<b>approved release before 31 March 2020</b>	<b>Local Plan LSIS baseline</b>
Crayford West, Stadium Way/Maxim Road, Crayford	3.8655		3.8655
Northend Trading Estate, Northend Road, Erith	0.9574		0.9574
Old Bexley Business Park, Bourne Road/ Wier Road, Bexley	1.6362	1.1531	0.4831
Princes Street Employment Area, Bexleyheath	0.9718	0.5191	0.4527
Upland Road Employment Area, Bexleyheath	1.2568		1.2568
Upper Wickham Lane Employment Area, Welling	1.9972	0.2310	1.7662
<b>totals</b>	<b>17.1109</b>	<b>1.9032</b>	<b>15.2077</b>

**Table 4: Employment areas changes from UDP Proposals Map to local plan review industrial land baseline (all figures gross area in hectares)**

<b>Industrial category</b>	<b>UDP Proposals Map</b>	<b>UDP factual update</b>	<b>approved release at 31 March 2020</b>	<b>Local plan review industrial baseline</b>
Primary Employment Areas (SIL)	444.5302	418.8000	18.5489	400.2512
Secondary Employment Areas (LSIS)	16.9798	17.1109	1.9032	15.2077
<b>totals</b>	<b>461.5100</b>	<b>435.9109</b>	<b>20.4521</b>	<b>415.4588</b>

**Table 5: Proposed additions to SIL, changes from SIL to LSIS, and SIL or LSIS release to other land-use designations(all figures gross area in hectares)**

<b>Industrial area</b>	<b>site name</b>	<b>addition to SIL</b>	<b>change from SIL to LSIS</b>	<b>SIL/LSIS release</b>
<b>Belvedere Industrial Area</b>	Belvedere Gas Holders, Yarnton Way			3.4580
	Centurian Way		5.8488	
	Crabtree Manorway Industrial Estate (South) (Part)		10.0337	
	Crabtree Manorway Industrial Estate (South) (Part)			4.7311
	Monarch Works, Station Road North			0.6856

Industrial area	site name	addition to SIL	change from SIL to LSIS	SIL/LSIS release
Crossness Sewage Treatment Works	Crossness Sewage Treatment Works operational land (outside of the original Special Industrial Zone)	19.3399		
Erith Industrial Area/Estates and Slade Green Industrial Area	Europa Trading Estate		11.3877	
	Fraser Road and Birch Walk		3.1039	
	Slade Green Industrial Area (remaining area)		3.6713	
	Town Wharf, Manor Road (safeguarded wharf)	3.0124		
Foots Cray Business Area	Land between the A20 and Watery Lane	2.0968		
	Industrial units behind Lidl, Foots Cray High Street		0.6330	
Crayford West Secondary Employment Area	Former Electrobases/Wheatsheaf Works, Maxim Road			2.4260
<b>totals</b>		<b>24.4491</b>	<b>34.6784</b>	<b>11.3007</b>

**Table 6: Draft Local Plan Table 5 (revised post-Reg 19) showing proposed changes to designated industrial land (all figures gross area in hectares)**

Industrial land: baseline, additions and release	Area in hectares
Industrial land baseline (SIL and LSIS) at 31 March 2020	415.46
Baseline industrial sites recategorised from SIL to LSIS (subset of baseline figure)	34.68
New designations of SIL (figure added to baseline sub-total)	24.45
SIL/LSIS released for other uses (figure removed from running total)	11.30
<b>Total designated industrial land (SIL/LSIS) shown on local plan submission policies map</b>	<b>428.61</b>

## Appendix B: Detailed site information

Table 7: Primary employment areas (London Plan strategic industrial land (SIL) equivalent) and white land – detailed area and site information (all figures gross area in hectares)

Industrial Area or Site Name and address (figures for sites within areas are broken down across the row for the site)	Current local plan designation* (see note below table)	GLA 2017 GIS Layer for SIL (prior to agreement of local plan review baseline)	UDP Proposals Map digitised GIS layer (scale 1:10,000)	Updated figures due to factual correction to UDP Proposals Map layer** (see note below the table)	land use change at 31 March 2020	industrial land baseline at 31 March 2020	draft local plan proposed addition of SIL	draft local plan proposed change from SIL to LSIS	draft local plan proposed release of SIL	draft local plan proposed land use designation	justification for designation
<b>Belvedere</b>											
Belvedere Industrial Area		186.2294									
Belvedere Industrial Area, North of Bronze Age Way (A2016)	Primary Employment Land (UDP policies E3, TS1, TS2, TS6)		158.3942	147.3524		147.3524				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Crabtree Manorway Industrial Estate (South), Belvedere	Primary Employment Land (UDP policies E3, TS1, TS6)		17.0728	15.4505		15.4505		10.0337		Locally Significant Industrial Site	Remaining industrial land is being changed from its SIL designation to LSIS as it is no longer functioning as a strategic site
Crabtree Manorway South (west side)								1.2833		Primarily Residential Area	Industrial site is proposed for release for residential redevelopment
Crabtree Manorway South (east side)								3.4479		Primarily Residential Area	Industrial site is proposed for release for residential redevelopment
Monarch Works, Station Road North								0.6856		Primarily Residential Area	Industrial site is proposed for release for residential redevelopment
Eastern Industrial Estate Extension, Waldrist Way, Belvedere	Primary Employment Land	25.0512	23.8927	22.2859		22.2859				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Hailey Road Business Park, Belvedere	Primary Employment Land	14.4063	15.3050	13.2538		13.2538				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Norman Park, Norman Road and Picardy Manorway, Belvedere	05/02780/OUTM (Change of use to residential granted 30 Jan 2007)		4.8966	4.8223	4.8223					Primarily Residential Area	Site removed from industrial use before baseline set
Centurian Way, Belvedere	Primary Employment Land		9.3060	9.3067		9.3067		5.8488		Locally Significant Industrial Site	Change from SIL designation to LSIS as it does not function as a strategic site
SGN Gas Holders site, Yarnton Way, Belvedere								3.4580		Primarily Residential Area	Industrial site is proposed for release for residential redevelopment
<b>Belvedere totals</b>		<b>225.6869</b>	<b>228.8672</b>	<b>212.4716</b>	<b>4.8223</b>	<b>207.6493</b>	<b>0.0000</b>	<b>15.8825</b>	<b>8.8747</b>		

Industrial Area or Site Name and address (figures for sites within areas are broken down across the row for the site)	Current local plan designation* (see note below table)	GLA 2017 GIS Layer for SIL (prior to agreement of local plan review baseline)	UDP Proposals Map digitised GIS layer (scale 1:10,000)	Updated figures due to factual correction to UDP Proposals Map layer** (see note below the table)	land use change at 31 March 2020	industrial land baseline at 31 March 2020	draft local plan proposed addition of SIL	draft local plan proposed change from SIL to LSIS	draft local plan proposed release of SIL	draft local plan proposed land use designation	justification for designation
<b>Crossness STW</b>											
Crossness Sewage Treatment Works (CSTW), Thamesmead	Metropolitan Open Land (MOL)/White Land (expired SIZ)/Metropolitan SINC/Conservation Area	64.5915									CSTW is UDP Thames-side special policy area Site B (Crossness Sewage Treatment Works - Policy TS16).
Special Industrial Zone (SIZ) within Site B, CSTW	White Land. UDP Policy SIZ (special industrial zone) expired Sep 2007 as per 2004 PCPA		29.6557	28.0300		28.0300				Strategic Industrial Land/safeguarded waste facility	direct land use designation change from white land (expired SIZ) to SIL
Operational land excluding SIZ designation	Utilities Operational Land (UDP policy TS17)/ Metropolitan Open Land (MOL)						19.3399			Strategic Industrial Land/safeguarded waste facility	Some operational land not part of the expired SIZ designation will be an addition to SIL and removed from MOL. Note: some MOL will remain within the operational area
<b>CSTW totals</b>		<b>64.5915</b>	<b>29.6557</b>	<b>28.0300</b>	<b>0.0000</b>	<b>28.0300</b>	<b>19.3399</b>	<b>0.0000</b>	<b>0.0000</b>		
<b>Erith/Slade Green</b>											
Europa Trading Estate	Primary Employment Land (UDP policies E3, TS7)		12.1544	11.3877		11.3877		11.3877		Locally Significant Industrial Site	Change from SIL designation to LSIS as it does not function as a strategic site
Fraser Road/ Birch Walk	Primary Employment Land (UDP policies E3, TS7)		5.5750	3.1039		1.6741		1.6741		Locally Significant Industrial Site	Change from SIL designation to LSIS as it does not function as a strategic site
Former Atlas and GEC Works	98/00234/FUL (Change of use to non-food retail warehouse granted 18 May 2000)					1.4298		1.4298		Locally Significant Industrial Site	Planning consent is conditional in that the non-food retail warehouse reverts to industrial use if the consented use ceases
Manor Road Industrial Area	Primary Employment Land (UDP policies TS8)	41.7975	26.7717	26.9170		26.9170				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Town Wharf, Manor Road (safeguarded wharf)	White Land (UDP policy TS5)						3.0124			Strategic Industrial Land/safeguarded wharf	direct land use designation change from white land to SIL as well as the safeguarded wharf designation
Slade Green Industrial Area	Primary Employment Land (UDP policies E3 and TS12)		9.2076	9.2077		3.6713		3.6713		Locally Significant Industrial Site	Change from SIL designation to LSIS as it does not function as a strategic site
Former Linpac Site and adjoining warehouse, Richmer Road	15/00370/OUTM (Change of use to residential granted 13 Oct 2016).					5.5363				Primarily Residential Area	Site removed from industrial use before baseline set
<b>Erith/Slade Green totals</b>		<b>41.7975</b>	<b>53.7087</b>	<b>50.6162</b>	<b>5.5363</b>	<b>45.0799</b>	<b>3.0124</b>	<b>18.1629</b>	<b>0.0000</b>		

Industrial Area or Site Name and address (figures for sites within areas are broken down across the row for the site)	Current local plan designation* (see note below table)	GLA 2017 GIS Layer for SIL (prior to agreement of local plan review baseline)	UDP Proposals Map digitised GIS layer (scale 1:10,000)	Updated figures due to factual correction to UDP Proposals Map layer** (see note below the table)	land use change at 31 March 2020	industrial land baseline at 31 March 2020	draft local plan proposed addition of SIL	draft local plan proposed change from SIL to LSIS	draft local plan proposed release of SIL	draft local plan proposed land use designation	justification for designation
<b>Crayford</b>											
Darent Industrial Estate	Primary Employment Land UDP policies TS9, TS10	29.0392	28.0354	26.1149		26.1149				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Thames Road Industrial Area	Primary Employment Land (UDP policies TS11)	53.7412	48.2888	46.9183		46.9183				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Crayford Industrial Area	Primary Employment Land	23.3997	23.1954	22.3274		14.4033				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Former Samas Roneo	09/00334/OUTM (Change of use to residential granted 4 Jun 2010)				4.6515					Primarily Residential Area/Urban Open Space	Site removed from industrial use before baseline set
Tower Retail Park and Tower Park Road Industrial Estate	97/01701/OUT (Change of use to retail granted 11 Aug 1998)				3.2727					Town Centre (District Centre)	Site removed from industrial use before baseline set
<b>Crayford totals</b>		<b>106.1801</b>	<b>99.5196</b>	<b>95.3606</b>	<b>7.9242</b>	<b>87.4365</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		
<b>Foots Cray</b>											
Foots Cray Business Area	Foots Cray Business Area (UDP policies E3, E5, E6)	35.1918	22.6891	22.7371		22.4710				Strategic Industrial Land	direct land use designation change from primary employment land to SIL
Progressive House	Foots Cray Business Area (UDP policies E3, E5, E6)				0.2661					Primarily Residential Area	Site removed from industrial use before baseline set
Five Arches Business Centre	Foots Cray Business Area (UDP policies E3, E5, E6)		10.0898	9.5845		9.5845		0.6330		Strategic Industrial Land/Locally Significant Industrial Site	An element of the Five Arches Business Centre is being designated as LSIS (this site is adjacent but is not accessible from the estate)
Foots Cray Business Area (B&Q/DFS Sidcup)	White land (previously part of the Foots Cray Business Area)						2.0968			Strategic Industrial Land	Note: this is not designated employment land and will be an addition to SIL
<b>Foots Cray totals</b>		<b>35.1918</b>	<b>32.7789</b>	<b>32.3216</b>	<b>0.2661</b>	<b>32.0555</b>	<b>2.0968</b>	<b>0.6330</b>	<b>0.0000</b>		
<b>Totals for all SIL</b>		<b>473.4479</b>	<b>444.5302</b>	<b>418.8000</b>	<b>18.5489</b>	<b>400.2512</b>	<b>24.4491</b>	<b>34.6784</b>	<b>8.8747</b>		

## NOTES

\*Current land use as designated in the 2004 UDP policies and proposals map, amended by the 2007 Secretary of State Direction that retained only certain UDP policies, and the policies of the 2012 Bexley Core Strategy, which allow for a managed release of designated industrial land up to 50 hectares over the local plan period (2011 – 2026)

\*\*Updated figures are factual corrections to the UDP Proposals Map, which was originally drawn by hand at a scale of 1:10,000 and then digitised afterwards. The corrections have been obtained by the act of redrawing the original UDP GIS shape files with greater accuracy (e.g. to be read at a larger scale), to align with an up-to-date base map. In addition, the industrial area has been reduced (or increased) once rationalisation with designated Green Belt, Urban Open Space and Locally Important Geological Sites have been taken into account, as removing these areas does not affect useable industrial land.

**Table 8: Secondary employment areas (London Plan locally significant industrial site (LSIS) equivalent) – detailed area and site information (all figures gross area in hectares)**

Site name and address	Current local plan designation* (see note below table)	UDP Proposals Map digitised GIS layer (scale 1:10,000)	updated figures due to factual correction to UDP Proposals Map layer** (see note below the table)	land use change at 31 March 2020	industrial land baseline at 31 March 2020	proposed release of LSIS	draft local plan proposed land use designation	justification for designation
Bourne Industrial Park, Bourne Road, Crayford	Secondary Employment Area	3.0627	3.2024		3.2024		Locally Significant Industrial Site	direct land use designation change from secondary employment area to LSIS
British Bakeries, Belmont Road, Northumberland Heath	Secondary Employment Area	3.2161	3.2236		3.2236		Locally Significant Industrial Site	direct land use designation change from secondary employment area to LSIS
Crayford West, Stadium Way/Maxim Road, Crayford	Secondary Employment Area	3.7908	3.8655		1.4395	2.4260	Locally Significant Industrial Site/ Primarily Residential Area/ Urban Open Space	Part of this industrial area (former Electrobase/Wheatsheaf Works) is proposed for release for residential redevelopment, with remainder designated as LSIS
Northend Trading Estate, Northend Road, Erith	Secondary Employment Area	0.9900	0.9574		0.9574		Locally Significant Industrial Site	direct land use designation change from secondary employment area to LSIS
Old Bexley Business Park, Bourne Road/Wier Road, Bexley	Secondary Employment Area/ 11/00406/FULM and 07/11658/OUTM (Change of use to residential granted 22 Sep 2011 and 25 Jun 2009)	1.6362	1.6362	1.1531	0.4831		Locally Significant Industrial Site/ Primarily Residential Area	Part of site removed from industrial use before baseline set, with remainder designated as LSIS
Princes Street Employment Area, Bexleyheath	Secondary Employment Area/ 95/02021/FUL (Change of use to residential care home granted 16 Feb 1996)	0.9538	0.9718	0.5191	0.4527		Locally Significant Industrial Site/ Primarily Residential Area	Part of site removed from industrial use before baseline set, with remainder designated as LSIS
Upland Road Employment Area, Bexleyheath	Secondary Employment Area	1.2800	1.2568		1.2568		Locally Significant Industrial Site	direct land use designation change from secondary employment area to LSIS
Upper Wickham Lane Employment Area, Welling	Secondary Employment Area/ 03/05495/FULM (Change of use to residential granted 22 Apr 2005)	2.0502	1.9972	0.2310	1.7662		Locally Significant Industrial Site/ Primarily Residential Area	Part of site removed from industrial use before baseline set, with remainder designated as LSIS
<b>totals for all LSIS</b>		<b>16.9798</b>	<b>17.1109</b>	<b>1.9032</b>	<b>15.2077</b>	<b>2.4260</b>		

#### NOTES

\*Current land use as designated in the 2004 UDP policies and proposals map, amended by the 2007 Secretary of State Direction that retained only certain UDP policies, and the policies of the 2012 Bexley Core Strategy, which allow for a managed release of designated industrial land up to 50 hectares over the local plan period (2011 – 2026)

\*\*Updated figures are factual corrections to the UDP Proposals Map, which was originally drawn by hand at a scale of 1:10,000 and then digitised afterwards. The corrections have been obtained by the act of redrawing the original UDP GIS shape files with greater accuracy (e.g. to be read at a larger scale), to align with an up-to-date base map. In addition, the industrial area has been reduced (or increased) once rationalisation with designated Green Belt, Urban Open Space and Locally Important Geological Sites have been taken into account, as removing these areas does not affect useable industrial land.

Table 9: Draft Local Plan – UDP proposals map to baseline and proposed designated industrial land (SIL and LSIS) totals (all figures gross area in hectares)

<b>Editable GLA 2017 GIS SIL Layer (.SHP)</b>	<b>UDP Proposals Map digitised GIS layer (scale 1:10,000)</b>	<b>Updated figures due to factual correction to UDP Proposals Map layer*</b>	<b>land use change at 31 March 2020</b>	<b>designated industrial land baseline at 31 March 2020</b>	<b>draft local plan proposed addition of SIL</b>	<b>draft local plan proposed change from SIL to LSIS</b>	<b>draft local plan proposed release of SIL/LSIS</b>	<b>draft local plan total SIL/LSIS</b>
473.4479	461.5100	435.9109	20.4521	415.4588	24.4491	34.6784	11.3007	428.6073

\*\*Updated figures are factual corrections to the UDP Proposals Map, which was originally drawn by hand at a scale of 1:10,000 and then digitised afterwards. The corrections have been obtained by the act of redrawing the original UDP GIS shape files with greater accuracy (e.g. to be read at a larger scale), to align with an up-to-date base map. In addition, the industrial area has been reduced (or increased) once rationalisation with designated Green Belt, Urban Open Space and Locally Important Geological Sites have been taken into account, as removing these areas does not affect useable industrial land.