

Appendix 2

Evidence to support the making of an Article 4 Direction to remove the Class MA permitted development right in the Vale Royal/Brewery Road Locally Significant Industrial Site

Introduction and background

1. The London Borough of Islington intends to use an Article 4 Direction to remove permitted development rights for the change of use from Class E to residential use (Class MA) in the Vale Royal/ Brewery Road Locally Significant Industrial Site (LSIS).
2. The LSIS, with its dense concentration of employment uses makes a critical contribution to the prosperity of the Borough and supports the wider economy of the CAZ. The Class MA Permitted Development Right would allow changes of use without consideration of their economic impact on the Borough or the CAZ. Permitted development changes of use in the LSIS would cause significant harm to the Islington economy and the wider London economy.
3. A template setting out key factual points and evidence about the LSIS can be found at the end of this document. It provides a brief assessment of the area and covers a range of issues including employment characteristics, site allocations, heritage designations and social value considerations.
4. As the borough's only Locally Significant Industrial site, the LSIS is an important and long-established employment and industrial area. The area contains a wide range of business types including light industry, storage and distribution, research and development.
5. The consistency of this Direction with local, London-wide and national planning policy is also set out later in this appendix.

Employment Land Study

6. The Islington Employment Land Study 2016 (ELS) demonstrates that there have been large losses of industrial land in recent years - 436,000sqm (43.6 hectares) between 2000 and 2012, amounting to a 54% loss¹. Despite this loss, within the LSIS industrial land has remained relatively stable. The LSIS operates to near full capacity, with vacancy rates well below the frictional vacancy target rate of 5% (which allows for churn of occupiers). The London Industrial Land Supply & Economy Study 2015 identifies a vacancy rate of 0.9% in the LSIS and there is evidence of significant demand from potential occupiers to locate in the area. The ELS identifies that severely constrained supply and sustained take-up are combining to maintain rents at a relatively high level. The profile of occupier demand illustrates a broad range of business types.
7. Alongside more traditional industrial uses, the ELS encourages opportunities for the intensification of other business uses in the LSIS, particularly through the provision of 'hybrid' space. The ELS identifies hybrid workspace as space which combines features of office, light industrial, studio and production space and can often straddle traditional use class classifications.

¹ Islington Council, Employment Land Study, January 2016, paragraph 4.2.5.

8. The majority of the LSIS is made up of large footprint industrial buildings with the potential to be refurbished and re-used for hybrid uses, to offer a more flexible combination of business and light industrial floorspace. While the remaining industrial land should be maintained in accordance with policies C6, C13 and DM5.3 of the local plan and policies SP3, B1(e), B2(c) and B3(c) of the emerging plan, the nature of activities is likely to continue to evolve within the LSIS. The area will likely play an increasing role in providing or the emerging market of hybrid/flexible space and providing some of the lower threshold enterprise space which is needed for start-up companies.
9. The ELS notes that demand for hybrid space is growing as more traditional firms seek out 'less industrial' premises, to reflect their 'clean' processes, as well as from digital and creative firms looking for space with a 'less corporate' feel. Such firms are typically SMEs. Those seeking 'less industrial' premises are usually involved in 'service based' industrial activities, rather than traditional industrial uses. Usually, B2 and B8 uses which require an office element alongside their industrial space.
10. More recently, developer interest in the LSIS has shifted towards hybrid laboratory/office space for the health and life science sector. The fact that this trend was not identified in the ELS (published in 2016) reflects the fast-moving nature of this industry. Life sciences are a key component of the UK's rapidly growing knowledge economy, with the sector gaining significant traction following the COVID-19 pandemic². The UK's response to the pandemic, which involved playing a key role in understanding the virus and developing vaccines, demonstrated the country's research and innovation potential.
11. Hybrid space is also popular with occupier businesses working in the digital economy of software and graphics, through creative businesses operating in media, advertising and music, to more traditional businesses, offering professional services, including management consulting, recruitment and built environment. These occupiers are service-based organisations which usually require space for Class E(c) and Class E(g) uses.

The LSIS and the CAZ

12. The London Plan emphasises the importance of last mile distribution and essential 'just-in-time' servicing for the CAZ. The LSIS is located in close proximity to the CAZ and has an important function in supporting essential services in Central London and borough-wide. The ELS provides a detailed analysis of the type of industrial activities present in the LSIS which range from warehousing and distribution of supplies to creative production businesses.
13. Islington's Draft Local Plan recognises the capacity that the LSIS has for the intensification of industrial employment uses and allows the provision of hybrid workspace suitable for SMEs. As the CAZ faces further pressure from other land uses and employment uses intensify in the vicinity, there is an opportunity to re-use some of the stock in the LSIS for hybrid uses.
14. Many industrial areas, including the LSIS accommodate 'clean' activities that provide for the expanding Central London business market³. Such activities which support the Central London economy may also exist alongside more traditional forms of industrial uses. These are considered to be essential to the functioning of the economy and for servicing the

²HM Government, Build Back Better: Our Plan for Growth - Life Sciences Vision, July 2021 sets out the Government's ambition for the UK to become a global centre for innovation in life sciences.

³ Examples of such activities include building services, catering, cleaning, courier services, hospitality services, maintenance, media production, office supplies, and technology support services.

needs of its growing population, as well as contributing towards employment opportunities for Londoners.

Specialist Clusters in the LSIS

Creative Industries

15. The Creative Supply Chains Study was carried out by the GLA (2019) as part of the Mayor's Cultural Infrastructure Plan. It provides supportive evidence about the important role that creative production businesses play through their wider supply chain, both within London and across the UK. It estimates that the overall value of the supply chain is £127bn, much of which is centred on London area as a key centre of production and consumption of creative output⁴.
16. The term "creative industries" is widely used and means very different things to different audiences. Broadly speaking it involves
 - Production – places where creative work is made, usually by artists, performers, makers, manufacturers or digital processes;
 - Consumption - where culture is experienced, participated in, showcased, exhibited or sold;
 - Wider economy - businesses that provide goods, services and skills to support production and consumption activities (e.g. technical products and operators or services such as catering or translation).
17. Office based occupiers can locate anywhere where there is office space available. In Islington there has been a rapid growth of office-based "creative industries" over the last decades, e.g. Tech City in the wider Old Street area, where a large concentration of tech and digital companies have clustered.
18. However, creative production businesses need industrial spaces, which are usually only found in designated sites/clusters of industrial land. Designated industrial sites are designated precisely for the purpose of accommodating businesses which have different requirements to offices, for instance in terms of deliveries and servicing including use of large vehicles, the need for 24-hour access to sites etc. Some of the creative production businesses produce their own product or services, whilst others, within the wider economy, are part of the supply chain. As evidenced in the Creative Supply Chains Study, creative supply chain activity happens in a range of workspaces, including studio spaces and industrial units. The study acknowledges that industrial land is under unprecedented pressure in London and that this has a direct impact on production and employment capacity of creative supply chains.
19. The list below includes some examples of the type of creative production businesses located in the LSIS:
 - Matt Snowball and John Henry, both suppliers of logistics and sound equipment for live events. John Henry also has retail and rehearsal space;
 - Bandicoot Recording Studios;
 - Backgrounds, a props hire company;
 - Big Sky Studios, a photographic studio;
 - Sensible Music, a sound recording studio; and
 - Electro-Tech Colour Ltd, a graphics company who design and manufacture hoardings.

⁴ GLA, Creative Supply Chains Study, October 2019, page 15.

20. The Council recognises the importance of creative production industries which contribute not only to the local economy but also to the wider attractiveness of London and the UK. Our policies (C6, C13 and DM5.3 of the local plan and policies SP3, B1(e), B2(c) and B3(c) of the emerging plan) and this Direction support in this key sector within the LSIS.

Catering and Food-related businesses

21. The Council's mapping exercise has shown that there is a significant cluster of food-related businesses in the LSIS. The uses include commercial processers and distributors. These fall within Use Class B2. There is general industry in the form of commercial food production (Carnevale, Pasta and Pasta), a number of catering butchers (Hensons, Billfields, TSJ Woodhouse), as well as a craft brewery (Two Tribes Brewery). Whilst these catering and food-related businesses do not fall within Use Class E, they are important to the local area, and have accommodation that could potentially be at risk of conversion under Class MA.
22. Such businesses provide a supporting function to the agglomerations of nationally and internationally significant businesses within the CAZ. Due to high land values, there is very limited industrial and logistical capacity to deliver essential supporting services within the CAZ, including food processing, storage and distribution. Businesses within the CAZ instead rely on 'just-in-time' servicing provided by suppliers located on industrial sites in close proximity to the CAZ boundaries. The services provided by the catering and food-production businesses located in the LSIS are essential for the successful function of the CAZ, and the wider London and UK economy. It is therefore critical that they are located geographically close to the main area they serve, which is the CAZ.
23. While catering and food businesses do not fall within Class E, it is likely that most will include some Class E(g)(i) ancillary office elements which may be threatened under Class MA. Such businesses tend to operate out of large industrial warehouses. The office space is usually annexed and accessed via a separate entrance, leading to a potential risk of subdivision and conversion under Class MA. Any prior approval application would be subject to public consultation and full assessment against Class MA conditions.

Life sciences

24. The life science sector currently makes up a significant portion of the UK's rapidly expanding knowledge economy. The Life Sciences Industrial Strategy (2017) sets out the significance of life sciences within the UK economy and provides recommendations to the Government on the long-term success of the industry. It considers how the UK can further develop and strengthen the sector, in line with the Government's ambition to become a leading global hub for life sciences⁵. This ambition is reflected in Government spend on health research and development which stood at \$3.4bn in 2019⁶.
25. The Mayor's Economic Development Strategy for London (2018) encourages the growth of new life science developments, with an ambition to promote London and the wider South East as a pioneer of life science innovation internationally. The Strategy recognises and supports the need to develop supporting physical infrastructure. For the LSIS, this involves delivering hybrid laboratory/ office space.

⁵ HM Government, Life Sciences Vision, July 2021, page 3.

⁶ Office for Life Sciences, Life Science Competitiveness Indicator Report, July 2021, page 11.

26. The location of life science firms is a key component of the UK's mission to maintain and grow its position as a global leader in health and life science. Clustering life science uses together helps to support innovation by facilitating collaboration, driving growth, and attracting global talent and investment. The co-location of life science uses, to bring together industry, investors, academia, the NHS and research institutions, should therefore be encouraged⁷.
27. There is currently a significant level of developer interest in the LSIS for hybrid laboratory/ office space to serve the life science sector. As a result, uses of a more industrial nature are becoming less and less common. The LSIS is an attractive location for life sciences uses for a number of reasons. The area is in close proximity to the Knowledge Quarter. The LSIS also contains a concentration of large footprint industrial buildings that are particularly suitable for housing flexible office-based/ hybrid units for research and development.
28. The emerging life science cluster includes the recent development at 188 York Way (formerly the Fitzpatrick Building, now known as Rolling Stock Yard) a nine-story building providing a mix of office and light industrial/ laboratory space (6,716sqm). The development was purchased by Life Science REIT (an investment trust for UK properties leased, or intended to be leased, to the life science sector) in December 2021. It is currently occupied on a number of floors by two major medical research companies - Gyroscope Therapeutics (specialising in gene therapies related to blindness) and Forcefield Therapeutics (developing cardio-protective proteins to address heart disease). The Kadans block at 5-10 Brandon Road, with manufacturing, laboratory and office space, is also currently at site preparation stage (10,500sqm). This development will further boost the supply of flexible floorspace for laboratories and office space in the LSIS.
29. Alongside the completed and ongoing developments, the Council have received a number of pre-applications for the development of hybrid laboratory/office space to accommodate the life sciences sector. Confidential pre-application discussion have taken place about a site in the Vale Royal/ Tileyard Road area of the LSIS, demonstrating the continued and expanding developer interest in the LSIS for such uses.
30. Of the 10 emerging LSIS site allocations, 4 sites are specifically allocated for the co-location of office and/or research and development use, where there is an intensification of industrial use on the site, and it can be demonstrated that the continued industrial function of the LSIS would remain.
31. The 4 sites are as follows:
- 230-238 York Way, currently in B8 use (VR2);
 - 20 Tileyard Road, currently in B2 use (VR4);
 - 4 Brandon Road, currently in business use (VR6);
 - 34 Brandon Road, currently in light industrial and residential use (VR10).
32. Additionally, 22-23 Tileyard Road and part of 226-228 York Way, which is currently in B2, B8 and Sui Generis use, has planning permission (P2019/3300/FUL) for light industrial, flexible business use and an ancillary café. It is noted that the site may be subject to further amendments which may include the co-location of office and/or research and development use (VR5).

Wider Strategic Role of the LSIS

⁷ NHSA, MedCity and HIRA-NI, Life sciences: Super Clusters for Global Britain and Northern Ireland, February 2022, page 2.

33. The GLA's strategic evidence to support commercial to residential Article 4 Directions (July 2021) highlights that the CAZ and its agglomerations of national and international importance rely on the supply of essential supporting functions which include 'just-in-time' servicing such as food service activities, printing, administrative and support services, office supplies, repair and maintenance and sustainable distribution and logistics. Given the land values in the CAZ, it is acknowledged that there is very limited industrial and logistics capacity, with many of the essential support functions typically being provided by businesses in industrial land in close proximity to the CAZ, commonly in LSIS and non-designated sites⁸. The LSIS is a perfect example of this.
34. The Islington Local Plan Employment Topic Paper 2020 outlines an increasing demand for storage and distribution operations within the LSIS for a range of reasons, including growth in e-commerce. The LSIS hosts a number of storage and distribution operations which serve a variety of sectors including catering and food processing/distribution (Carnevale, Pasta and Pasta, Hensons, Billfields, and TSJ Woodhouse); vehicle repairs, hire and storage (Kings X Motors, R. Proeitti, Sixt Car Hire); and tool and equipment hire (BSS Kings Cross, Speedy Services, Brandon). All provide essential supporting functions to the CAZ.

Consistency with local, London and national planning policy

35. The introduction of an Article 4 Direction to remove Class MA permitted development rights in the LSIS is consistent with, and necessary to achieve the objectives of local, London-wide and national planning policy.

National Policy

36. Paragraph 83 of the NPPF requires planning policies and decisions to address and recognise the specific locational requirements of different sectors, including creative or high technology industries and storage and distribution operations. The LSIS is safeguarded through London Plan and Local Plan policies in order to meet the locational requirements not only of the businesses types and clusters who use it (and broader demand for these uses in such locations), but also in recognition of the wider role it plays in supporting other businesses in the borough and the CAZ.

London Plan Policy

37. London Plan policy E4 seeks to protect land for industry, logistics and services to support London's economic function:
- Part A, requires there to be a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions and that these should be provided and maintained taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.
 - Part B considers the retention, enhancement and provision of industrial capacity should be managed in relation to the three categories of industrial land/sites.
 - Part C continues to require boroughs to plan, monitor and manage the retention, enhancement and provision of industrial capacity.

⁸ GLA Strategic evidence to support commercial to residential Article 4 Directions, July 2021, paragraphs 6.2.18 – 6.2.19.

- Part D highlights that the retention, enhancement and provision of industrial capacity should be prioritised in locations that are accessible to the strategic road network, provide services that support London's economy and population, they help to provide space for SMEs and support access to supply chains and local employment. [The LSIS considered to meet these criteria].
 - Part G requires boroughs to ensure the need to retain sufficient industrial capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.
38. London Plan Policy E6 Locally Significant Industrial Sites requires boroughs to designate and define detailed boundaries and policies for LSIS justified by evidence in employment land reviews and make it clear the range of industrial and related uses that are acceptable. Policy E7 requires development plans to be proactive in encouraging intensification of businesses uses in industrial land.



Local Policy

39. Core Strategy policies CS6 and CS13 identify the Vale Royal/Brewery Road area as a Locally Significant Industrial Site (LSIS), to be retained for industrial/warehousing/employment use. Although a considerable shift in the nature of employment uses have already occurred within the LSIS, the aim is not to shore up dying industries (as this would lead to economic inefficiencies), but to protect an increasing variety of employment spaces.
40. Development Management Policy DM5.3 seeks to retain and enhance appropriate uses – including B1(c) – in the LSIS and sets out criteria which needs to be met where loss of such uses is proposed. Introduction of any non-business uses (except for supporting/ancillary services and facilities such as small cafes) will be refused. This approach is integral to maintaining amenity and wellbeing of businesses in the LSIS, as well as those businesses in the rest of the borough who rely on services provided within the LSIS.
41. The Draft Local Plan policies, which protect existing industrial land, are based on local evidence base which reinforces the need to safeguard the small amount of industrial land that remains in the borough, most of which is concentrated in the LSIS.
42. Draft Local Plan policy B3(C) safeguards the existing industrial land and floorspace, and policies B1(E) and B2(C) state that Industrial Sites should be the focus for provision of new industrial uses, namely B1(c), B2 and B8 uses.
43. Draft Local Plan policy SP3 seeks to retain and strengthen industrial uses in the LSIS, by retaining industrial land and intensifying B1(c), B2 and B8 uses, including Sui Generis uses akin to those industrial uses. The provision of hybrid workspace that accommodates a range of industrial uses is also particularly supported. Policy SP3 seeks to support the wide range of operators accommodated in the LSIS, including some existing office use, as well as a number of businesses related to the music and entertainment industry. Development proposals should, as a minimum, not result in a net loss of industrial floorspace. Office and research and development floorspace will be considered if it is included as part of a scheme where it can be clearly demonstrated that there would be an intensification of industrial floorspace and the continued industrial function of the LSIS would remain.

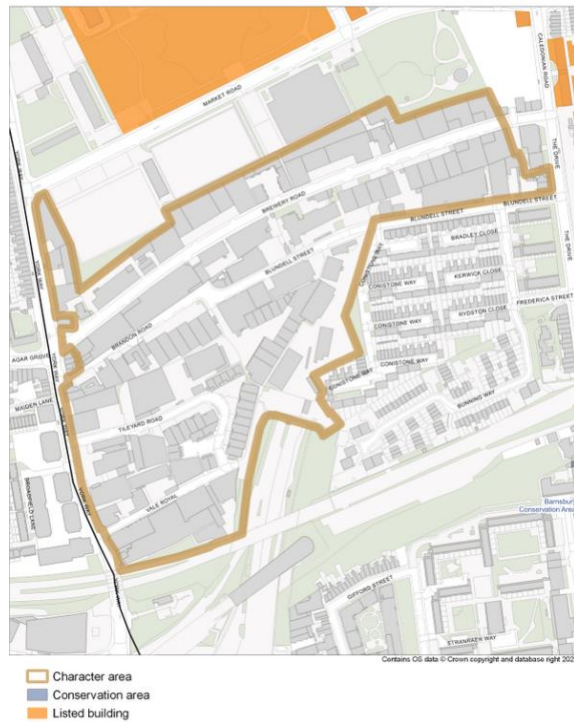
Vale Royal/ Brewery Road Locally Significant Industrial Site



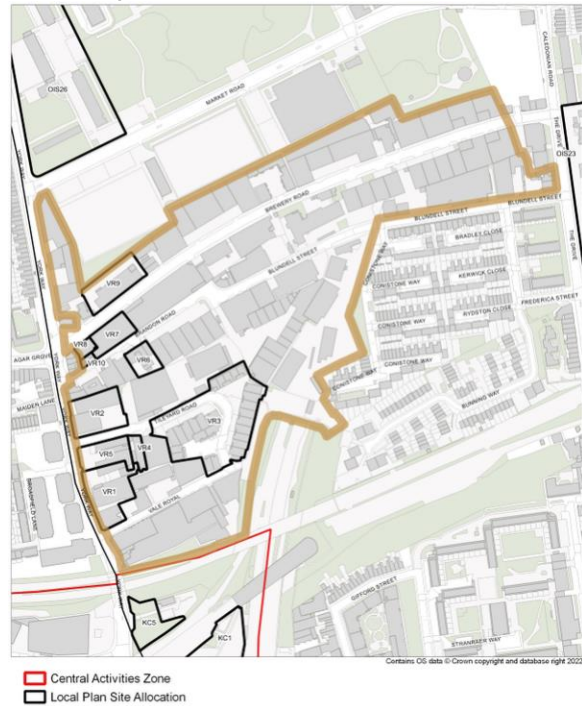
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-  Central Activities Zone
-  Article 4 Direction Class MA

Area map 1: Heritage



Area Map 2: Allocations



Description: the LSIS is located in the west of the borough near the boundary with the London Borough of Camden, in close proximity to Kings Cross, Central London and the CAZ.

The buildings range in height from two to four storeys. Almost all are in industrial or other type of employment use, many with large footprints and servicing yards behind high walls. The surrounded area is mixed use in nature, with residential streets, sports facilities and the former Pentonville Prison. At the southern boundary is the wide London Overground cutting.

Employment Characteristics

- The Borough's only Locally Significant Industrial Site;
- Long-established employment/ industrial area;
- Local Plan says site is an important industrial location to be retained and strengthened – it is subject to an Area Spatial Strategy to guide development;
- Employment Land Study (2016); a vacancy rate of 0.9%; evidence of significant demand from potential occupiers to locate in the area from a broad range of business types; ELS identifies that severely constrained supply and sustained take-up are combining to maintain rents at a high level.
- Wide range of businesses present: film/ TV production, catering, building, plumbing, heating trade suppliers, self-storage, photographic studios, prop hire, car rental and repair and charity/ social enterprises;
- Specialist clusters:
 - Services to the music and entertainment industries including Tileyard Studios which comprises ca. 10,000sqm of writing and

	<p>office space dedicated to the music industry, also Bandicoot Recording Studios, John Henry Retail and Rehearsal venues, and the Music Business School; and</p> <ul style="list-style-type: none"> ○ Catering operations and food-related businesses including Catering Butchers (Hensons, Billfields, TSJ Woodhouse), Food Production and Warehouse (Carnevale, Pasta and Pasta, Two Tribes Brewers). ○ Emerging life-science cluster benefitting from proximity to Knowledge Quarter. Includes Kadans block on Brandon Road, with manufacturing, laboratory and office, under construction (10,500sqm). <p>Types of class E in LSIS: E(a) Sale of Goods: Warehouses with sale of building supplies, tiles, janitorial equipment and tool hire to members of public and trade; E(g)(i): Offices; E(g)(ii): Research and development; and E(g)(iii): Industrial processes.</p> <p>Other uses in LSIS: B2 (General Industry) and B8 (Storage and Distribution); F1 (Primary School).</p> <p>Main building types:</p> <ul style="list-style-type: none"> • Contemporary office space and music studios; • Warehouse conversions – used as offices, artist; studios, showrooms etc.; • Warehouses with office element; • Multi-storey warehouses; • Warehouses.
Retail and other town centre uses	<ul style="list-style-type: none"> • Limited amount: a couple of local shops, sandwich shops and cafes on York Way and Caledonian Road.
Key sites and Allocations	<p>Location is close to Central London and CAZ.</p> <p>Ten sites in emerging Allocations. Key sites:</p> <ul style="list-style-type: none"> • Fayers Site, 202-228 York Way: prominent corner site with B2, B8, Sui Generis use identified for retention and intensification. Office space only acceptable as part of hybrid workspace scheme. Permission granted Jan 2021 (ref. P2019/3410/FUL) for 3-5 storey building comprising self-storage floorspace and flexible office (Use Classes: B8 and E(687sqm)). Scheme Under construction (VR1).

	<ul style="list-style-type: none"> • York Way: large prominent site in use as food and beverage warehouse with light industrial and office space occupied by Kitopi Ltd and Como Ltd. Allocated for intensification including hybrid space (VR2); • Tileyard Studios: large site in centre of LSIS used by music industry with offices, event space and co-working space, earmarked for intensification (Allocation being considered by Inspector) (VR3). <p>Key aim across LSIS Allocations is intensification of employment space with priority the delivery of hybrid space featuring light industrial features and hybrid space rather than E(g)(i) offices.</p>
Heritage Designations	<ul style="list-style-type: none"> • None
Social Value Considerations	<ul style="list-style-type: none"> • Light industrial companies provide increasingly rare technical and manual employment opportunities in proximity to Central London. • Loss of light industrial space would harm clusters, reduce agglomeration potential and business opportunities.
Class MA Considerations	<ul style="list-style-type: none"> • The cumulative floorspace of many buildings exceeds 1,500 square metres, however in most office/ light industrial sites the office element could be separated off and converted via Class MA. Examples of where this could be done are: <ul style="list-style-type: none"> ○ 10, 12, 14 and 14a Brewery Road, all of which have a shallow floorplan first floor office element as part of a mix of Class E and Class B uses. This Class E element could be separated off and could be at risk of conversion to residential under Class MA; ○ 30-40, 42-50 and 52-60 Brewery Road: mix of Class E and Class B uses. This shallow floorplate Class E element could be separated off and could be at risk of conversion to residential under Class MA; ○ 8-50 Blundell Street, a warehouse with a mix of Class E(g)(i), B2, B8. There is a three-storey office element onto Blundell Street which could be separated off and could be at risk of conversion to residential under Class MA; ○ 260-276 York Way, mix of office (Class E) fronting York Way, and Class B elements. The office element could be separated off and could be at risk of PD change of use to residential; ○ 1 and 3 Brewery Road, both sites have a first floor office as part of a mix of Class E

	<p>and Class B uses. The Class E element has a shallow floorplan with large windows and could be at risk of PD change of use to residential.</p> <ul style="list-style-type: none"> • External alterations would be needed to light industrial spaces to provide daylight for change to residential use - such as at the above sites - but in most cases the office element is separate, with large windows and would not need alterations to be at risk of PD change of use to residential; • There is no heavy industry in the LSIS there are no buildings where noise would represent a constraint on Class MA. <p>Conclusion – some of potential impacts on future occupiers can be considered under the Prior Approval process, however the Class MA criteria represent a limited constraint on the PDR.</p>
NPPF Considerations:	<p>How is this the smallest geographical area possible?</p> <p>All buildings outside Class E have been identified and excluded. The Council's mapping and survey work has helped identify buildings that are not in class E use. There are a number of premises that are offices (e.g. 6 Blundell St Quarto Group Publishing or 1 Brandon Road Survation survey organisation) or are in light industrial use in full/part which have been assessed for the potential risk of conversion (listed above under Class MA Considerations). This fine grain analysis means that only a relatively small proportion of the LSIS is proposed to be included.</p> <p>In addition, numerous building in Class E have been excluded from the Direction. These include:</p> <ul style="list-style-type: none"> • 419, 419a, 421 Caledonian Road x3 Class E (café, retail, dry cleaners) ground floor units on busy street, change to residential would not result in unacceptable harm to employment cluster. • 244 York Way, Class E(b) restaurant, loss would not result in unacceptable harm to employment cluster. <p>The Direction Area has been reduced to the smallest geographical area possible in accordance with NPPF paragraph 53.</p>
How is it necessary to avoid wholly unacceptable adverse impacts?	Lack of employment space or higher cost of space is likely to force companies to leave the area. New

	<p>companies may be unable to afford to locate there or to find suitable accommodation.</p> <p>This would have a wholly unacceptable impact on the employment clusters in the LSIS as key companies may have to close, relocate or scale down. This includes the emerging life science cluster and the cluster of uses supporting music/entertainment in the LSIS which contributes to the attractiveness of London and the UK.</p> <p>If change to residential was allowed at the identified sites an amenity expectation would be established which would hinder efficient use of land. This would undermine the Local Plan objective to retain and strengthen the LSIS due to its strategic importance.</p>
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