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GLA: London Plan Industrial Evidence Paper

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This version updates the PDF version published on 16 July 2026 as follows:

Location	Change																					
Table 2	The figures in the column ‘E(g)(iii) – ha land’ have been updated as follows to reflect corresponding error in Chapter 7 of the GLA Economic Uses Demand and Supply study. <table><tr><th>PMA</th><th>original</th><th>updated</th></tr><tr><td>CSA</td><td>3.71</td><td>4.20</td></tr><tr><td>Thames Gateway</td><td>1.55</td><td>1.76</td></tr><tr><td>Lea Valley</td><td>- 1.49</td><td>- 1.69</td></tr><tr><td>Park Royal / A40 / Heathr</td><td>- 1.23</td><td>- 1.39</td></tr><tr><td>Wandle Valley</td><td>- 0.34</td><td>- 0.38</td></tr><tr><td>London</td><td>2.20</td><td>2.50</td></tr></table>	PMA	original	updated	CSA	3.71	4.20	Thames Gateway	1.55	1.76	Lea Valley	- 1.49	- 1.69	Park Royal / A40 / Heathr	- 1.23	- 1.39	Wandle Valley	- 0.34	- 0.38	London	2.20	2.50
PMA	original	updated																				
CSA	3.71	4.20																				
Thames Gateway	1.55	1.76																				
Lea Valley	- 1.49	- 1.69																				
Park Royal / A40 / Heathr	- 1.23	- 1.39																				
Wandle Valley	- 0.34	- 0.38																				
London	2.20	2.50																				
Table 8	The figures in the column ‘Light Industrial E(g)(iii) demand’ have been updated as follows to reflect above changes and a calculation error: For the Lea Valley PMA the figure has been changed from -1 to -2 and for London from 2 to 3.																					

1 Introduction

- 1.1 This report sets out the process of strategic plan-making for industrial land. It takes the independent Economic Uses Demand and Supply study¹ as a core input and builds it into a process that looks beyond economic needs. This process is informed by the Draft London Plan's Good Growth objectives and other objectively assessed needs, notably housing, and a consideration of the spatial implications of various decisions relating to the quantum and distribution of growth and change.

¹ [London Plan Evidence | London City Hall](#)

2 Establishing a demand-based land need

Storage and distribution

- 2.1 The National Planning Policy Framework (NPPF) 2024² states planning policies should make provision for storage and distribution operations (paragraph 87(b)) and identify suitable locations for uses that support a modern economy including freight and logistics (paragraph 86 (c)). The draft NPPF 2025³ explicitly supports improvements in freight and logistics (Policy E2(1)a). The Economic Uses Demand and Supply study, projected the additional demand specifically for storage & distribution (S&D), which represents the majority of Use Class B8 but excludes outdoor storage, as not covered by the data sources, as well as self-storage, transport depots and data centres. Demand for S&D is considered to be influenced by growth in population spend and GVA. The specific methodology and key assumptions are set out in chapter 8 of the above-mentioned study.
- 2.2 This has resulted in indicative demand for each London borough, which is included in Appendix A. The borough figures have been rounded and aggregated to industrial Property Market Area (PMA) levels (see Table 1 below and Economy sub-key diagram for PMAs) to represent the S&D demand benchmarks that are set out in Table 4.1 of the draft London Plan supporting Policy GLE2 Supply of industrial land. The aggregation to PMA level figures ensures that capacity constraints within individual boroughs, including those resulting from industrial release, are recognised.

Table 1 Storage and distribution demand benchmarks by PMA in square metre (sqm) floorspace and hectare (ha) land (source: Arup: Economic Uses Demand and Supply Study 2026)

PMA	000 sqm floorspace 2024-36	000 sqm floorspace 2024-50	ha land 2024-36	ha land 2024-50
Central Services Area (CSA)	320	760	70	140
Thames Gateway	330	770	70	140
Lea Valley	110	200	20	40
Park Royal / A40 / Heathrow	350	750	80	140
Wandle Valley	150	330	30	60
Total	1,260	2,810	270	520

- 2.3 It is assumed that increasingly ambitious efficiency savings are realised, for example through operational improvements such as automation, layout optimisation and digital inventory management, through increasing floor heights as well as through industrial intensification in suitable locations. This means that proportionately less land will be required for storage and distribution over time.

² [National Planning Policy Framework - GOV.UK](#)

³ [National Planning Policy Framework: draft text for consultation](#)

- 2.4 The Economic Uses Demand and Supply study sets out the detailed floorspace and land efficiency saving assumptions and options (chapter 8). The assumptions for the longer time-period are more ambitious from the start. However, in the interim to 2036 more moderate efficiencies are assumed, giving developers the opportunity for transitioning to and making a step-change towards significant increases in efficiencies. But therefore, the longer-term benchmark will not only require higher efficiency rates from 2036 but also 'catching up' on those levels of efficiency not achieved until then, and this is around 70 ha.

Other industrial uses

- 2.5 Additional demand projections for Use Classes B2 General Industrial, E(g)(ii) Research and Development (R&D) and E(g)(iii) Light Industrial informed the overall industrial land supply and demand balance in section 4 below. The projections are based on translating employment-by-sector projections into floorspace. The specific methodology and key assumptions are set out in chapter 7 of the Economic Uses Demand and Supply study.
- 2.6 This has resulted in the following indicative demand for each PMA to 2036 (Table 2) and to 2050 (Table 3). Individual borough level figures are in the above-mentioned study.

Table 2 Indicative floorspace and land demand for General Industrial B2, Light Industrial E(g)(iii) and Research and Development E(g)(ii) 2024 to 2036 (Source: Arup: Economic Uses Demand and Supply Study 2026)

PMA	B2 - sqm floor-space	E(g)(iii) - sqm floor-space	E(g)(ii) - sqm floor-space	B2 - ha land	E(g)(iii) - ha land	E(g)(ii) - ha land
CSA	-137,500	31,500	147,600	-22.92	4.20	19.68
Thames Gateway	-35,300	13,200	3,000	-5.89	1.76	0.41
Lea Valley	-36,400	-12,700	600	-6.07	-1.69	0.09
Park Royal / A40 / Heathr	-150,200	-10,400	66,100	-25.04	-1.39	8.81
Wandle Valley	-19,900	-2,900	8,200	-3.31	-0.38	1.10
London	-379,300	18,700	225,500	-63.23	2.50	30.09

Table 3: Indicative floorspace and land demand for General Industrial B2, Light Industrial E(g)(iii) and Research and Development E(g)(ii) 2024 to 2050 (Source Arup: Economic Uses Demand and Supply Study 2026)

PMA	B2 - sqm floor-space	E(g)(iii) - sqm floor-space	E(g)(ii) - sqm floor-space	B2 - ha land	E(g)(ii) i) - ha land	E(g)(ii) - ha land
CSA	-295,700	-34,300	323,100	-42.24	-3.26	30.77
Thames Gateway	-137,600	10,400	6,800	-19.65	0.99	0.64
Lea Valley	-88,300	-31,400	1,600	-12.61	-2.99	0.15
Park Royal / A40 / Heathr	-342,300	-31,900	139,200	-48.89	-3.04	13.25
Wandle Valley	-61,300	-15,800	20,200	-8.76	-1.51	1.93
London	-925,200	-103,000	490,900	-132.15	-9.81	46.74

Relevant infrastructure uses

- 2.7 Demand for sui generis infrastructure uses that depend on industrial land cannot be quantified reliably and varies based on local circumstances. The approach in draft London Plan policies MBUL4 and MBUL5, GLE10 and GLE12 is focused around the protection of existing sites in local plans, acknowledging most utilities, waste management and transport infrastructure tend to prioritise upgrades and optimisation on those existing sites, where there is sufficient capacity. The situation is different for data centres, however, they are not defined as industrial uses in the draft London Plan. Further detail for a wide range of infrastructure uses is set out in chapter 11 of the Economic Uses Demand and Supply study.

3 Release of industrial land to support housing delivery

Rationale

- 3.1 Despite the additional land needed for industrial uses, the significant need for housing has to be recognised. Some industrial land is in well-connected locations, and to make best use of existing resources, it is necessary to explore release for housing. This is consistent with the overall spatial strategy approach to making best use of land, and associated existing infrastructure investment, minimising release by focusing it in areas where higher densities can be sustained. However, this must be done in a way that minimises impacts on industrial requirements and operations, including their infrastructure requirements, and therefore overall economic functionality of each PMA and London overall.

Methodology for plan-led industrial release

- 3.2 The following sets out the methodology used to identify potential areas for release. Associated geospatial resources will be made available to plan-making authorities in due course.

Step 1 – filtering out land not suitable for release

- 3.3 The starting point was all land that is Sustainable Access Measure (SAM) level 4 or above in the London Industrial Land Supply (LILS) study data on the London Datastore (see further details in the baseline supply part of section 4). This was then filtered to **exclude** all:
- Non-designated industrial land below the small site threshold (0.25ha), or where the aggregate area of suitable land after other exclusions on a Strategic Industrial Location (SIL), Locally Significant Industrial Site (LSIS) or non-designated site is less than the small site threshold – an equivalent process, ensuring managed release of small sites in industrial use is applied as part of the small sites methodology detailed in the Strategic Housing Land Availability Assessment⁴ (SHLAA). This ensures that such small sites are not pushed to deliver more than has been historically absorbed
 - Land covered by residential permissions in the Planning London Datahub (PLD)
 - Strategic infrastructure locations that depend on industrial land – covering (broadly based on the LILS, Table 2.2):
 - Waste/recycling/secondary materials and aggregates – includes refuse disposal facilities (tips, landfill sites and disposal plants), recycling facilities and amenities, as well as handling of secondary materials and aggregates
 - Utilities – includes energy production and distribution, water/wastewater supply and treatment and telecommunications

⁴ [London Plan Evidence | London City Hall](#)

- Rail – includes land for tracks, depots, railheads/terminals, but only if on designated land currently or in 2010
- Buses – includes land for garages and depot facilities
- Airport related activities and freight – includes storage of planes, aero parts, repair and other areas for cargo
- Docks – land in use for marine infrastructure such as piers and jetties
- Safeguarded wharves
- Primary freight access clusters – SIL/LSIS with very good freight access (see Appendix B)
- Land safeguarded for future transport investment or where future safeguarding may be necessary
- Land within the Central Activity Zone (CAZ) and Northern Isle of Dogs plus a 3km buffer around these.

3.4 These exclusion criteria are reflected in Part A of draft London Plan Policy PV5.

3.5 In addition, **SHLAA-aligned exclusion and discount criteria** relating to flood risk⁵, viability⁶ and airport, road and railway noise⁷ contours were applied. These are covered by the NPPF and other draft London Plan policies that would also affect residential suitability and deliverable capacity.

Step 2 – sustainable release benchmark and ranking the industrial land in scope for release

3.6 The remaining industrial land was in scope for release. It was divided by PMAs (see second column in Table 5 below).

3.7 For each PMA a sustainable **benchmark of floorspace loss** was calculated using 9% of the existing industrial floorspace which has been derived from analysis of 5-year averages for 2011 to 2020 by PMA and accounts for concerns over high levels of loss as set out in the LILS. 9% is a 7-year aggregation of an annual loss of 1.3%, allowing for a 3-year lead-in for it to be plan-led. Gross losses were used, i.e. no adjustment was made for floorspace gains, as the measure was designed to capture the impacts of loss on local businesses, services and jobs rather than the overall balance of meeting industrial needs. This floorspace rate was translated into a land-based rate by applying the average plot ratio in each PMA, ranging from 42.6% in the Lea Valley PMA up to 97.4% in the CSA, based on the LILS.

3.8 The land in scope (suitable candidate supply) per PMA was then ranked as follows:

⁵ If more than 25% of a land parcel was at high flood risk it was excluded. This threshold was chosen, as it fitted with wider assumptions around net versus gross site areas used in the optimisation framework as applied in the SHLAA, which assumes a certain amount of any site is not in residential use but used for other infrastructure, which could include green infrastructure.

⁶ Excluding land if it fell within a value band modelled to be unviable in all scenarios, and discounting land by 50%, if it was marginally viable by virtue of its value band location and expected development typology.

⁷ Excluding land if affected by 'high' noise levels and discounting it by 10% if affected by 'medium' levels of noise (Sourced from strategic noise mapping round 4 (2022) and based on day-evening-night level (Lden). Available at: <https://www.gov.uk/government/publications/strategic-noise-mapping-2022>)

- Severity of flood risk first, ensuring land with lowest flood risk in any category was prioritised
- In line with the plan objective of making best use of land, the next ranking criterion prioritised land in (residential-oriented) Brownfield First Opportunity Areas (BFOAs). This was because these have already benefited from or are planned to have significant transport investment and other interventions, and additional residential capacity would strengthen the business case for doing so, making best use of the transport connectivity and bringing improved potential for place-making benefits, which in turn can help improve viability.
- The next preference started with sites outside of secondary freight access clusters (see Appendix B) and then within that pool, land with the highest SAM down to level 4 (the mean SAM score for each fragment of industrial land was used).
- Sites were then ranked by industrial designation, starting with non-designated land, and using SIL in any ranked category last.

3.9 Land was selected for release by working through the ranking process (from left to right in Table 4 for all land in primary ranking category 1, and then down to land in primary ranking category 2, and so on) until the sustainable release benchmark was reached. In two PMAs, (Thames Gateway and Park Royal) the suitable candidate supply was exhausted before that benchmark was reached, reflecting the previous exclusion criteria set out in Step 1.

Table 4: Summary of ranking process

Ranking	Flood risk	BFOA	Outside secondary freight access clusters	SAM level	Industrial designation
1	From none to highest acceptable	Yes	Yes	From highest down to 4	From non-designated up to SIL
2	From none to highest acceptable	Yes	No	From highest down to 4	From non-designated up to SIL
3	From none to highest acceptable	No	Yes	From highest down to 4	From non-designated up to SIL
4	From none to highest acceptable	No	No	From highest down to 4	From non-designated up to SIL

3.10 An **alternative designation-led approach** was also tested and is described in Appendix C. This was rejected, as it yielded less overall housing potential.

- 3.11 Where suitable based on the Step 1 filtering, additional land in **non-industrial use or vacant was added** to the release quantum even when it would take total release to above the sustainable release benchmark. This was considered acceptable given a large proportion of vacant industrial (99%) and non-industrial (93%) land would remain available to the market and given the plan objective to make best use of land (the methodology focused on highly accessible land and filtered out land not suitable for release – see Step 1).
- 3.12 In addition, where Land4London sites that were allocations or draft allocations fell within the release pool, their capacities were sense-checked and uplifted where co-location policy expectations had previously limited assessed residential capacity, unless they were in recently adopted plans or those that had reached Reg 19 stage.
- 3.13 The industrial release potential resulting from the above process, which was conducted iteratively and subject to sense-checking⁸ throughout, is set out in Table 5 below.

Table 5: Industrial candidate release pool for housing per PMA to 2036/37 in hectares (rounded to nearest integer)

PMA	Area of candidate sites for industrial release for housing (after Step 1)	Effective release area after applying sustainable release benchmark and adding suitable vacant and non-industrial uses (i.e. after Step 2)
CSA	37	35
Thames Gateway	59	13
Lea Valley	120	60
Park Royal / A40 / Heathrow	70	120
Wandle Valley	53	50
London	339	278

- 3.14 **Additional release** may be identified through further plans within a longer timeframe which will be able to account for additional land brought into scope by SAM uplift through transport investment such as the Bakerloo line extension, West London Orbital or other transport interventions. This has not been explored at this stage, as such interventions are not sufficiently committed to be relevant to the 10-year targets.

Development-management led release

- 3.15 The above sets out the process for plan-led release. The focus of release through development management, as set out in draft London Plan policy PV5, is from non-designated industrial land, but as this tends to be smaller in size and/or fragmented, a limited number of the most accessible designated industrial sites are to be released

⁸ Note however that additional local sense-checking may be appropriate when establishing the boundaries of release areas, taking local detail into account such as specific existing operations/businesses that are economically significant and cannot be relocated.

through development proposals to speed up the delivery of housing and to address the time lag of plan-led release.

- 3.16 The development-management led release is a sub-set of the plan-led release with locations being at least partly within SAM 5. The table in Appendix D identifies the five largest parcels of land that lie at least partly within SAM 5. Given the substantial amount of land arising from this initial list, the three largest parcels in each PMA were identified for further assessment. Using the most up-to-date available aerial and street-level imagery these sites were reviewed by building age and typology and the extent to which the uses align with the planning uses supported on designated industrial land. However no clear distinction could be made between the potential release parcels.
- 3.17 Consideration of their spatial distribution indicated that including all of the sites could result in a concentration of releases within relatively limited areas potentially resulting in significant localised employment losses. The removal of SIL sites from the shortlist ensured a focus on LSIS locations only, reflecting the strategic policy protections afforded to SIL. The approach was refined to identify two sites per PMA, as set out in Table 6.2 of the draft London Plan (also included below as Table 6) ensuring a more balanced and proportionate spatial distribution of potential release locations while reducing the risk of concentrated job losses.

Table 6 Development-management led industrial release locations as in Table 6.2 in the draft London Plan

LSIS name	Parcel name	Local Planning Authority	Property Market Area
Blackhorse Lane	Land East of Blackhorse Lane and North of Hooker's Road	Waltham Forest	Lea Valley
South Tottenham	Whole of South Tottenham	Haringey	Lea Valley
The Vale	Whole of The Vale	Ealing	Park Royal/A40/Heathrow
Palmerston/Oxford Road	Land adjacent to Palmerston Road, Oxford Road and Byron Road	Harrow	Park Royal/A40/Heathrow
Nursery Lane	Whole of Nursery Lane	Newham	Thames Gateway
Oakfield Road	Whole of Oakfield Road	Bromley	Thames Gateway
Union Road	Land South East of Windmill Road and North West of Union Road	Croydon	Wandle Valley
Dundonald Road Industrial Area	Whole of Dundonald Road Industrial Area	Merton	Wandle Valley

4 Balancing industrial land need and supply

Baseline supply

- 4.1 The Economic Uses Demand and Supply study has provided supply data for industrial floorspace 2011- 2025 based on Valuation Office Agency (VOA) data (see Table 7 below for PMA aggregation and individual borough data in chapter 4 of the above-mentioned study). It gives an overview of the scale of supply and loss over 14 years, most prominent in the CSA. It is not broken down into different industrial uses.

Table 7 Industrial floorspace by PMA (000 square metres) (source: Arup: Economic Uses Demand and Supply Study 2026)

PMA	Industrial floorspace, 2025	Average annual rate of change, 2011-2025
CSA	3,480	-135
Thames Gateway	6,155	-53
Lea Valley	2,557	-32
Park Royal / A40 / Heathr	7,615	-59
Wandle Valley	2,113	-26
London	21,923	-305

- 4.2 The [London Industrial Land Supply \(LILS\) study on the London Datastore](#), which was published in 2023 with land data from 2001 to 2020, is broken down into individual industrial uses and provides context for the industrial land supply and is the spatial starting point for the industrial release model set out in section 3. The LILS is also used as the land data source for vacancy and 'other' uses data (see supply and demand balance below). The data related to land in Table 2.5 has been complemented collecting completions (losses and gains of industrial uses) on PLD since 2020. A list of those very limited land use changes recorded from this data source since the original report has been added to the LILS page on the Datastore.

Supply and demand (land need) balance

- 4.3 Tables 8 and 9 below show for the time periods to 2036 and 2050 respectively the significant additional demand for S&D (see section 2) alongside the varying and adjusted land demand projections for other industrial uses (also based on section 2). The potential supply from vacant land is adjusted to account in particular for potential infrastructure requirements (for more detail see paragraph 4.5 below). There is also more detail about the components of the supply demand balance in the Economic Uses Supply and Demand Study (chapter 14). The identified land for industrial release to 2036 (see section 3) is then added to the resulting shortfall, and this represents the starting point for the consideration of Green Belt release for industrial (for more detail see the section on Green Belt release below).

Table 8 Additional industrial land demand and supply balance (excluding Green Belt release) 2024 to 2036 in hectares (ha)

Geo-graphy	S&D demand	General industrial B2 demand*	Light Industrial E(g)(iii) demand**	R&D E(g)(ii) demand ***	Vacancy surplus ****	Industrial release for housing	Total supply shortfall
CSA	71	-23	4	20	-6	35	100
Thames Gateway	71	-6	2	0	-109	13	-29
Lea Valley	23	-6	-2	0	-11	60	64
Park Royal/A40 Heathrow	76	-25	-1	9	-17	120	162
Wandle Valley	32	-3	0	1	-3	50	76
London	273	-63	3	30	-147	278	373

* Assumed that surplus can be repurposed to accommodate demand for S&D or is released.

** Assumed that small surplus is re-purposed by Light Industrial demand within the same PMA or is released.

*** Assumed some R&D can be accommodated on non-industrial land, for example in town centres, but its proportion has not been specified.

**** Adjusted total from LILS taking account of the current industrial land occupation by 'other' uses (largely infrastructure).

Table 9 Additional industrial land demand and supply balance (excluding Green Belt release) 2024 to 2050 in hectares

Geo-graphy	S&D demand	General industrial B2 demand*	Light Industrial E(g)(iii) demand**	R&D E(g)(ii) demand ***	Vacancy surplus ****	Industrial release for housing*****	Total supply shortfall
CSA	139	-42	-3	31	-6	35	143
Thames Gateway	139	-20	1	1	-109	13	25
Lea Valley	37	-13	-3	0	-11	60	70
Park Royal/A40 Heathrow	137	-49	-3	13	-17	120	202
Wandle Valley	60	-9	-2	2	-3	50	98
London	512	-132	-10	47	-147	278	548

- * Assumed that surplus can be repurposed to accommodate demand for S&D or is released.
- ** Assumed that small surplus is re-purposed by Light Industrial demand within the same PMA or is released.
- *** Assumed some R&D can be accommodated on non-industrial land, for example in town centres but its proportion has not been specified.
- **** Adjusted total from LILS taking account of the current industrial land occupation by 'other' uses (largely infrastructure).
- ***** Note this is only the 10-year planned release, and additional release may be identified through further plans which will be able to account for additional land brought into scope by transport investment.

4.4 Sources of additional supply to help meet future need for industrial land include:

Vacant industrial land

- 4.5 The vacant land identified in the LILS provides some source of supply. However, 43% of this vacant land is projected to continue to be allocated to 'other' uses. Based on the LILS distribution 70% of these 'other' uses are infrastructure uses and 10% are open storage. The full list of 'other' uses is included in Appendix E and also chapter 13 of the Economic Uses Demand and Supply study, although it has to be recognised that some infrastructure uses may need more additional land than those proportions indicate, for example to support London's growth.

Surplus industrial land

- 4.6 The employment-based trend for Use Class B2 is declining considerably, but it is assumed that the majority of this B2 supply surplus can be repurposed to accommodate S&D uses, for which there is significant demand. There is no specific evidence on the exact scale of the repurposing potential, and the low level of observed repurposing from B2 to B8 in PLD does not represent the suitability of repurposing accurately, and in reality, the share for repurposing could vary significantly.
- 4.7 The repurposing potential of all industrial uses in the LILS is also recognised in the industrial release modelling where land with suitable industrial characteristics has been excluded from release (see section 3). However, it is assumed that land which is not repurposed for S&D is in well-connected locations within the pool of release for housing.
- 4.8 The future employment-based demand trend for Light Industrial (E(g)(iii)) is also in decline, but marginally. It is assumed that this can broadly be repurposed by additional need for Light Industrial within the same PMA. Some of its demand, alongside some of the demand for R&D, can potentially be accommodated outside industrial land, in particular in town centres, given their characteristics and requirements. As their locational requirements are quite different, the repurposing of Light Industrial for R&D is unlikely, although in reality within Class E uses can largely change without planning permission.

Industrial intensification

- 4.9 Some industrial re-provision commitments are included in Local Plans. However, some may include theoretical assumptions and a scale of intensification that is currently neither viable nor deliverable. There is limited evidence about successful intensification in terms

of floorspace or land supply and therefore no specific figure has been put on the scale of the contribution this can make to industrial supply.

- 4.10 Research by Turley [Multi-level industrial in London: Up in-the-air](#) (2026) found 24 referable multi-level industrial schemes since 2021, but only a quarter has progressed to construction. Overall, they delivered a floorspace uplift, but more specifically a gain of E(g)(iii) and a loss of B2 and B8. The majority are two-storey schemes.
- 4.11 However, looking ahead, the ambitious land efficiency savings set out in chapter 8 of the Economic Uses Demand and Supply study assume an acceleration of intensification over time to support making best use of land.

Surplus non-industrial land

- 4.12 This could for example include retail or office that is not suitable for housing, noting that where it is suitable, as detailed in section 3, it is assumed to be released for this purpose. However, there is no evidence for putting figures on the scale of conversion of non-industrial use to industrial. Viability testing considered this to currently not be viable, however there are some individual examples of site allocations and planning applications for change of use from out-of-town retail to industrial.

Green Belt release to address land-need shortfall

- 4.13 Green Belt release clusters had to be identified to help meet the projected industrial land shortfall (including industrial land to be released). Additional provision and re-provision in the Green Belt can provide efficient new industrial stock, better meeting modern S&D requirements and industrial uses driven by technology and innovation.
- 4.14 The methodology for identifying industrial Broad Locations for Growth, which are effectively areas of search to be refined through the Local Plan process, is described in more detail in the Green Belt Strategic Approach paper⁹. This sets out the use of a boundary-blind, London-wide approach to identifying locations that meet key S&D needs while minimising highways infrastructure and air quality impacts. The approach focuses on areas well-related to junctions with growth capacity on freight-suitable roads.
- 4.15 It should be noted that this is a separate approach to that for data centres, which are not defined as industrial use but may also need Green Belt locations once it has been established that all suitable brownfield sites are exhausted (see draft London Plan Policy GLE3). As set out in paragraph 4.5 above, such sites may include vacant industrial land or industrial land occupied by non-industrial uses which is not suitable for release or storage and distribution use.

⁹ [London Plan Evidence | London City Hall](#)

Appendix A Indicative storage and distribution demand by London borough

Table 10 Indicative storage and distribution demand by London borough

London borough	sqm floorspace 2024-36	sqm floorspace 2024-50	ha land 2024-36	ha land 2024-50
Barking and Dagenham	35,000	75,000	8	14
Barnet	79,000	167,000	17	30
Bexley	79,000	167,000	17	30
Brent	31,000	56,000	7	10
Bromley	44,000	139,000	10	25
Camden	30,000	72,000	7	13
City of London	3,000	7,000	1	1
Croydon	55,000	133,000	12	24
Ealing	41,000	80,000	9	15
Enfield	31,000	63,000	7	11
Greenwich	43,000	79,000	9	14
Hackney	19,000	59,000	4	11
Hammersmith and Fulham	27,000	70,000	6	13
Haringey	47,000	86,000	10	16
Harrow	40,000	80,000	9	15
Havering	82,000	217,000	18	39
Hillingdon	78,000	182,000	17	33
Hounslow	34,000	70,000	7	13
Islington	21,000	59,000	5	11
Kensington and Chelsea	23,000	58,000	5	11
Kingston upon Thames	36,000	70,000	8	13
Lambeth	38,000	90,000	8	16
Lewisham	24,000	67,000	5	12
Merton	26,000	60,000	6	11
Newham	6,000	9,000	1	2
Redbridge	36,000	82,000	8	15
Richmond upon Thames	18,000	49,000	4	9
Southwark	53,000	105,000	12	19
Sutton	31,000	70,000	7	13
Tower Hamlets	38,000	71,000	8	13
Waltham Forest	27,000	53,000	6	10
Wandsworth	35,000	86,000	8	16
Westminster	39,000	89,000	9	16

Source: Arup: Economic Uses Demand and Supply study (2026)

Appendix B Freight access clusters

The clusters shown in Figure 1 below were identified based on the suitability of the highway network for heavy goods vehicles, the directions of those connections (for example, to Central London only versus in multiple directions) and availability of multimodal freight access. The freight characteristics of each cluster are included in the table below the map. The green clusters are considered to be irreplicable reflecting fixed infrastructure such as wharves and railheads as well as particular highways connections, whereas the purple are strong but replicable. As such, these are categorised as 'primary' and 'secondary' freight access clusters respectively.

Figure 1 Freight access clusters in London

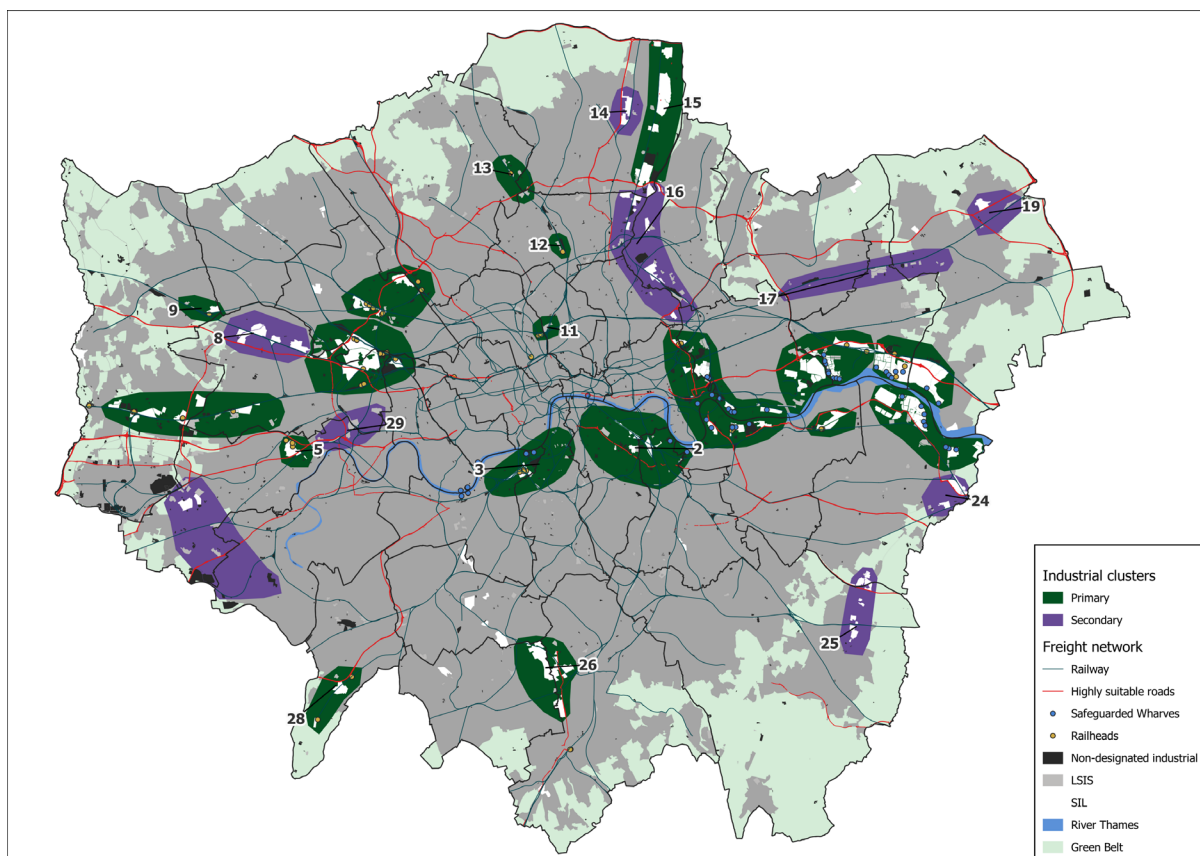


Table 11 Freight cluster access ratings

No.	Cluster name	Freight access rating	Justification for rating
1	Lower Lea/Royal Docks	Primary	Access to Silvertown, Blackwall tunnels and A13. Numerous safeguarded wharves.

No.	Cluster name	Freight access rating	Justification for rating
2	Old Kent Road	Primary	Proximity to CAZ and access to Old Kent Road in spite of otherwise weaker freight links
3	VNEB	Primary	Proximity to CAZ and A3, as well as two safeguarded wharves.
4	Old Oak Park Royal	Primary	Access to North Circular and A40 as well as rail network.
5	Great West Road	Primary	Direct access to A4 and M4 with North Circular in close proximity.
6	GWML	Primary	M4 in close proximity and multiple railheads for access to Great Western Mainline. International air freight via Heathrow Airport.
7	SE of Heathrow	Secondary	More distant access to M4, no rail access or safeguarded wharves. Does still benefit from proximity to Heathrow.
8	A40 / Greenford	Secondary	Access to A40 only.
9	South Ruislip	Primary	Access to A40 and railhead on Chiltern Mainline.
10	North Circular/M1	Primary	Access to both the North Circular and M1, although direct access to the CAZ is longer than other clusters on the North Circular. Also has access to several railheads.
11	Camden	Primary	Close proximity to CAZ and access to a railhead on the North London Line. Road access is generally poor.
12	Harringay	Primary	Small cluster with access to a railhead on East Coast Mainline.
13	New Southgate	Primary	Access to North Circular and railheads on East Coast Mainline.
14	Edmonton	Secondary	Immediate access to A10 and relative proximity to M25.
15	Upper Lea Valley	Primary	While not having immediate access to the A10, proximity to the A10 via connecting

No.	Cluster name	Freight access rating	Justification for rating
			roads and connections to the North Circular and M25 are quite strong.
16	Middle Lea/ Meridian Water	Secondary	Access to the North Circular at the northern end or the A12/East Cross Route at the southern end, however no link between the two of sufficient quality.
17	Ilford-Romford	Secondary	Located to the south of the A12 and no access to railheads despite being on the Great Eastern Mainline.
19	Harold Wood	Secondary	Access to the A12 and M25, but no rail access and distant from the CAZ.
20	Beckton & Barking Riverside	Primary	Access to the A13 and North Circular. A number of safeguarded wharves on the River Roding.
21	Dagenham Dock	Primary	Significant multi-modal freight connectivity with access to the A13 and multiple railheads and safeguarded wharves.
22	Bexley Riverside	Primary	Multi-modal freight connectivity provided by several safeguarded wharves and road access via the A2016 Eastern Way.
23	Plumstead	Primary	Access via the A2016 Eastern Way and rail connectivity.
24	Slade Green	Secondary	Limited road freight connectivity through the A206 Thames Road.
25	St. Mary Cray	Secondary	Access via the A20; no multi-modal connectivity.
26	Purley Way	Primary	Access via the A23 Purley Way and indirect multi-modal access via a railhead on the Brighton Mainline to the south.
28	Chessington	Primary	Access to the A3 and a railhead on the Chessington branch line.
29	Gunnersbury	Secondary	Limited quantity of industrial land in spite of otherwise strong freight connectivity. Access

No.	Cluster name	Freight access rating	Justification for rating
			via M4 and North Circular. No multi-modal access.

Appendix C Alternative designation-led ranking approach for release

The land in scope per PMA was ranked and confirmed as potential release as follows until the sustainable release benchmark was reached.

1. Flood risk from lowest to highest acceptable
2. Land not designated as SIL/LSIS (although most non-designated is below small-sites threshold), starting with sites outside of secondary freight access clusters and then within them the highest SAM band down to score 4 (the highest SAM band intersecting with the industrial area is used)
3. LSIS, starting with sites outside of secondary freight access clusters and then within them the highest SAM band down to score 4
4. SIL, starting with sites outside of the secondary freight access clusters and then within them the highest SAM band down to score 4.

Table 112 Ranking for designation led option

Ranking	Flood risk	Designation	Outside secondary freight access clusters	SAM band
1	From none to highest acceptable	Non-designated	No	From highest down to 4
2	From none to highest acceptable	Non-designated	Yes	From highest down to 4
3	From none to highest acceptable	LSIS	No	From highest down to 4
4	From none to highest acceptable	LSIS	Yes	From highest down to 4
5	From none to highest acceptable	SIL	No	From highest down to 4
6	From none to highest acceptable	SIL	Yes	From highest down to 4

Appendix D Five largest designated industrial land sites per PMA

The identified release locations are set out in Table 6.

Table 123 Five largest designated industrial land sites per PMA

Industrial land designation name	Local Planning Authority	PMA
Central Leaside Business Area (SIL)	Haringey	Lea Valley
Sherrin Road (LSIS)	Waltham Forest	Lea Valley
Tottenham Hale (SIL)	Haringey	Lea Valley
South Tottenham (LSIS)	Haringey	Lea Valley
Auckland Road (LSIS)	Waltham Forest	Lea Valley
South Acton (LSIS)	Ealing	Park Royal/A40/Heathrow
The Vale (LSIS)	Ealing	Park Royal/A40/Heathrow
Wealdstone Industrial Area (SIL)	Harrow	Park Royal/A40/Heathrow
N/A (LSIS)	Harrow	Park Royal/A40/Heathrow
N/A (LSIS)	Harrow	Park Royal/A40/Heathrow
Oakfield Road (LSIS)	Bromley	Thames Gateway
Blackhorse Lane (LSIS)	Waltham Forest	Thames Gateway
N/A (LSIS)	Havering	Thames Gateway
Nursery Lane (LSIS)	Newham	Thames Gateway
Connaught Road West (LSIS)	Redbridge	Thames Gateway
Morden Road Factory Estate and Prince George's Road (SIL)	Merton	Wandle Valley
North Wimbledon (SIL)	Merton	Wandle Valley
Gap Road Industrial Area (LSIS)	Merton	Wandle Valley
Dundonald Road Industrial Area (LSIS)	Wimbledon	Wandle Valley
Union Road (LSIS)	Croydon	Wandle Valley

Appendix E Land by 'other' uses

Table 14 Land by 'other' uses which are not covered specifically in the industrial land requirement assessment

'Other' use	Existing land in ha	% of 'other' uses	% of total industrial land
Utilities	1,071	35%	15%
Land for rail	387	13%	5%
Waste management and recycling	378	12%	5%
Open storage	306	10%	4%
Airport related land and freight	169	6%	2%
Retail	133	4%	2%
Office	101	3%	1%
Land for buses	80	3%	1%
Self-storage	62	2%	1%
Wholesale markets	43	1%	1%
Other non-industrial	40	1%	1%
Residential	39	1%	1%
Film and TV Studios	37	1%	1%
Data Centre	33	1%	0%
Mixed-use (non-industrial only)	31	1%	0%
Mixed-use (including industrial)	29	1%	0%
Recreation and leisure	24	1%	0%
Docks	23	1%	0%
Community services	18	1%	0%
Land with vacant buildings	18	1%	0%
Other industrial	7	0%	0%
Dark Kitchens	4	0%	0%
Total	3,041	100%	43%

Source: Arup: Economic Uses Demand and Supply study (2026)

