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**Via Email and Post**

31 October 2016

Dear Sir/Madam,

**AMEC STAFF PENSIONS TRUSTEE LIMITED (C/O LASALLE INVESTMENT MANAGEMENT) | EMPLOYMENT AND INDUSTRY LOCAL PLAN (EILP) REVIEW**

We are writing on behalf of our client, Amec Staff Pensions Trustee Limited (c/o LaSalle Investment Management), to submit representations on the Employment and Industry Local Plan (EILP) Review.

Whilst Amec Staff Pensions Trustee Limited welcomes the principle of the Employment and Industry Local Plan (EILP) Review, we comment specifically in relation to 37 Lombard Road, Wandsworth, London SW11 3RW (herein referred to as 'the site'). We will firstly set out the context of the site before commenting specifically on it in relation to the EILP. A site location plan has been included at **Appendix 1** of this letter for reference.

**Description of the Site**

The Site is located within the administrative boundary of the London Borough of Wandsworth ('LBW').

The site is currently occupied by a Travis Perkins store (builder's merchant) with associated offices and warehouses. There are three low rise buildings (1 to 2 storeys) on the site plus ancillary yard space, one retail warehouse and two industrial units. The site has associated car parking for approximately 37 vehicles.

On the basis that all three units are in use by Travis Perkins, the current land use is likely to be B8 (and / or A1 use where there are retail sales on the premises).

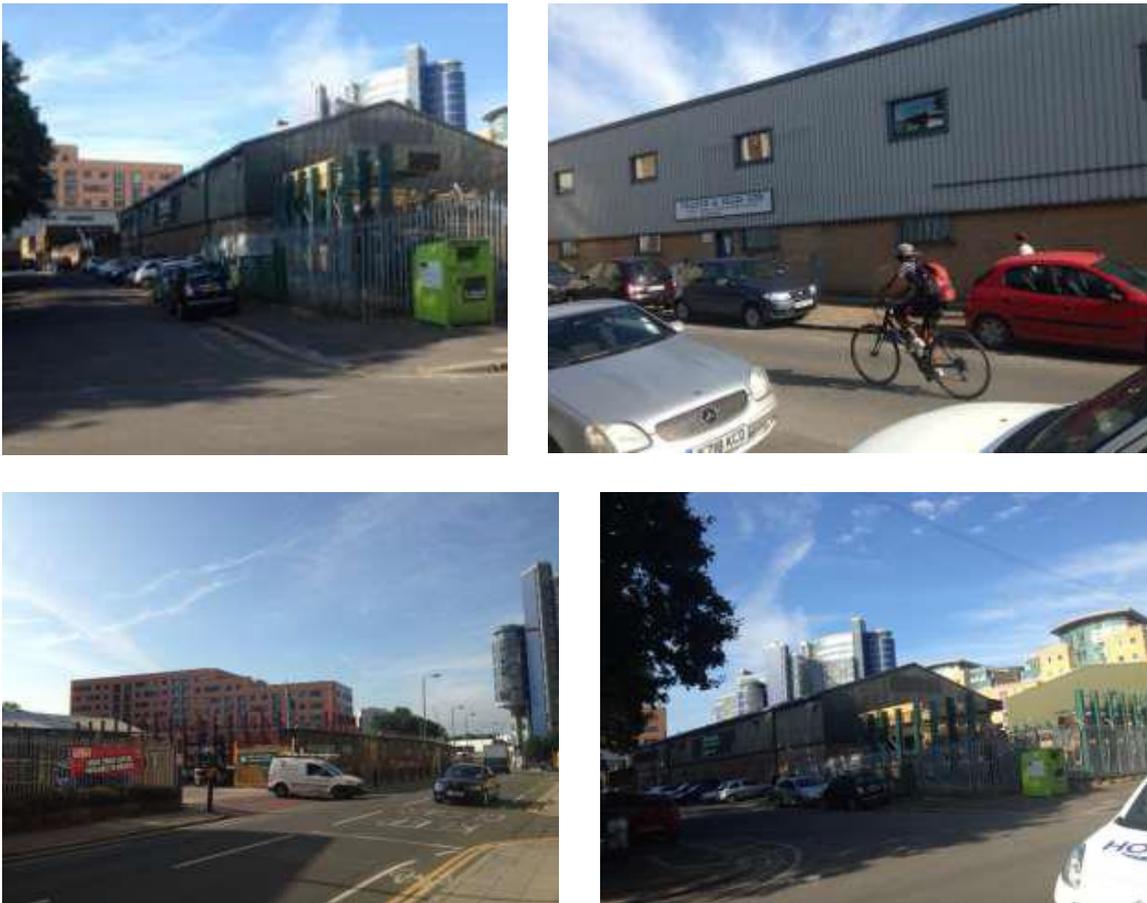
The existing buildings were permitted in 1983. The Planning Permission (Application Reference: Unknown) is as follows:

*“Erection of one-storey non-food retail warehouse (1,125sqm), part one / part two storey industrial unit (2,217sqm) and one storey industrial unit (322sqm); provision of 37 parking spaces with vehicular access from Lombard Road.”*

Planning Permission (Application Reference: 23/05/1988) was approved for *“Use as a builder’s merchants, including store/office on Harroway Road frontage, open store and lean-to-stores. Condition 2 of this application states that “the storage accommodation hereby approved shall be used only as a builders merchants and for no other purpose within Class A1 or Class B8 of the Town and Country Planning Use Classes Order 1987.”*

The site is bounded by Gwynne Road, Lombard Road and Harroway Road and can be accessed from the latter two roads. To the east of the site lies Harroway Gardens an area of local and publically accessible open space.

The overall site ownership, for the land and buildings, extends to 0.6 hectares in footprint. Please find a site location plan at **Appendix 1**. Photographs of the site are provided below (**Figure 1**).



**Figure 1** – Images of the Site

## Description of Surroundings

The site is located on the eastern side of Lombard Road. The site lies approximately 100 metres to the east of the River Thames, along which there are a number of modern, high density residential developments of between 5-24 storeys.

The surrounding area is characterised by a mix of uses. These include a Big Yellow Self Storage, Halfords and Pets at Home to the south of the site. Harroway Gardens is located east of the site, providing a focal point for Battersea's growing population. A self-storage warehouse and retail area are located to the north of the site on Gwynne Road. Oyster Wharf, a 9 storey residential development is located to the west.

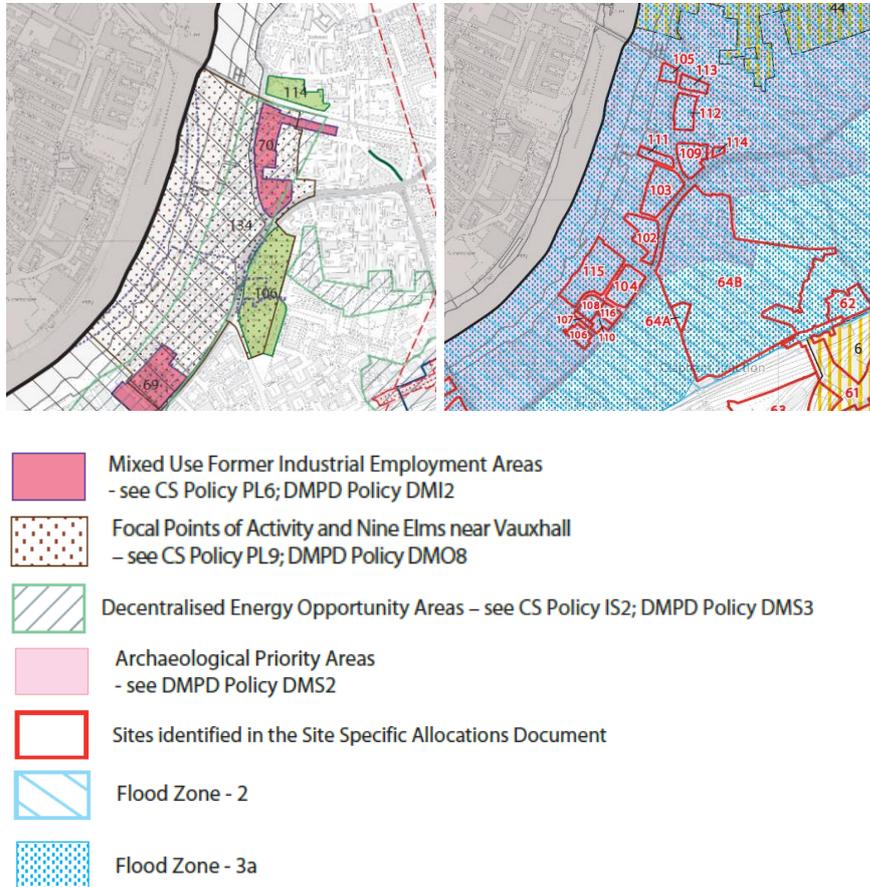
The site has good transport connections; the Public Transport Accessibility Level (PTAL) for the site varies between 2 and 3. Clapham Junction Station, which provides services to the south-east and south-west of England, is a 12 minute walk from the site. The site is also served by a number of bus routes (319, 345, 44, 344, 49, 170, 295 and C3). However, the PTAL rating for the site should improve when the proposed pedestrian footbridge to Imperial Wharf Station is open and Crossrail 2 arrives in the area from 2030.

## Planning Context

The site is allocated within LBW's Local Plan – Site Specific Allocations Document (adopted March 2016) and the Lombard Road/York Road Riverside Focal Point Supplementary Planning Document (adopted December 2015) for “*mixed use development incorporating replacement employment floorspace and residential use*” (Policies Map Reference Number: 112 and 12).

The Policies Map (adopted March 2016) also designates the site as **(Figure 2)**:

- A Focal Point of Activity (Core Strategy Policy PL9 and DMPD Policy DMO8).
- A Mixed Use Former Industrial Employment Area (MUFIEA) (Core Strategy Policy PL6 and DMPD Policy DMI2a). In MUFIEA's, mixed use redevelopment including residential is promoted and replacement of existing employment floorspace is required (DMDP Policy DMI2).
- An Archaeological Priority Zone (DMPD Policy DMS2).
- Flood Zone 3a (greater than 1 in 100 probability of river flooding (>1%) and greater than 1 in 200 (>0.5%) probability of flooding from the sea in any year) and Flood Zone 2 (between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1%-0.1%), or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5-0.1%) in any year).
- A Decentralised Energy Opportunity Area (CS Policy IS2; DMPD Policy DMS3).
- There are no nationally or locally listed buildings on the site and it is not located within a Conservation Area. Battersea Square Conservation Area lies to the north.



**Figure 2 – Policies Map (adopted March 2016)**

### **Local Plan: Employment and Industry Review**

The Employment Land and Premises Study (2016) projects that the balance between supply and demand for industrial land in the borough up to 2030 could reduce for industrial land by 9.5 hectares (in a low growth scenario) or increase demand for industrial land by 8.2 in a high growth scenarios. In the adopted Local Plan there is 141.9 hectares of protected industrial land.

The Study also identifies that the Lombard Road “*cluster has areas of poor and very poor environmental and build quality, predominantly in locations with older industrial premises, warehouses, or workshops. Redevelopment of the remaining industrial premises within the cluster would allow for intensification of activities, possibly to provide additional purpose built SME workspace or office premises (near the existing SME estates within the cluster).*”

The Employment and Industry Review Policy Options Document (October 2016) identifies that Mixed Use Former Industrial Employment Areas (MUFIEAs) were initially designated with the adoption of the original Core Strategy in 2010 and the DMPD in 2012, at which time the Employment and Premises Study by DTZ (2010) identified an adequate supply of employment premises in the



borough to meet demand. Whilst some MUFIEAs have been redeveloped, others still contain substantial quantities of industrial/distribution floorspace that have not been developed since the MUFIEA was introduced or have identified redevelopment projects in the pipeline. Moreover, the document goes on to state that in March 2016 the Lombard Road/York Road Riverside Focal point was designated, as a result all existing MUFIEAs are designated within or partially within a focal point or town centre. The wider aim for town centres, focal points and MUFIEAs is for continued priority release for non-industrial uses.

As set out above, our client's site is designated as a MUFIEA and is located within the Lombard Road/York Road Riverside Focal Point, where current planning policy (Policy DMI2) encourages mixed use development (including a residential component) providing that:

- *“Net employment floorspace equivalent to at least existing employment space is provided (and in particular flexible floorspace catering for small and medium sized enterprises;*
- *New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment land; and*
- *Existing surrounding uses will not have an adverse impact on the amenity of new residential space.”*

In accordance with the adopted policy framework for the site, the client has appointed a project team and begun to work up a mixed use scheme. This has included a series of Pre-application meetings with LBW Planning and Highways Officers, Officers at the GLA and two presentations to Councillor Ravi Govindia.

In light of the above and our client's intention to redevelopment the site, we consider that the Local Plan should continue to allow the loss of industrial and distribution uses in the MUFIEA areas for the following reasons:

- The NPPF sets out a presumption in favour of sustainable development and supports economic growth, as well as housing. The redevelopment of brownfield employment land is considered to represent sustainable development in accordance with the NPPF.
- The London Plan seeks to ensure that sufficient industrial and related uses are retained, where compatible, the London Plan indicates that the managed release of surplus industrial land is acceptable, especially where it will lead to the provision of more housing in appropriate locations.
- At the local level, the Employment Land and Premises Study (2016) sets out that in both a low growth and central growth scenario the existing supply of industrial land will outstrip the future demand in the borough up to 2030.
- The site is allocated within the Lombard Road/York Road Riverside Focal Point SPD and is designated as a MUFIEA, both of these designations prioritise the release of non-industrial uses. The designation of the site as a focal point of activity is based on clearly defined



benefits of regeneration, townscape and public realm that will result as a direct consequence of the co-ordination of development across a number of sites. Whilst some of the sites in the Lombard Road/York Road Riverside Focal Point have already been developed, further sites such as the redevelopment of 37 Lombard Road will complete the regeneration and continue transformation of this area.

- The MUFIEA designation encourages rather than restrains new development. It provides an opportunity to diversify the uses on a site, whilst re-providing modern fit for purpose employment floorspace and utilising the land more efficiently. However, the mixed use schemes being promoted on sites designated as MUFIEA are more compatible with SME space as opposed to the re-provision of industrial/distribution uses, and this should be given more prominence within planning policy wording.
- The environmental quality of the site and surrounding area has been identified as poor quality. The existing use of the site as a builder's merchant with its low level shed-like structures, associated open storage and utilitarian security fencing detract from the character of the surrounding public realm. Redevelopment of the site would provide an opportunity to make significant improvements to the townscape quality of Lombard Road, Gwynne Road and Harroway Gardens open space. This includes the opportunity to provide active frontages, public realm improvements and pedestrian routes through the site which would significantly enhance the area.
- Redevelopment of the site would allow for additional purpose built SME workspace or office premises at ground floor level, in close proximity to existing SME clusters, which would contribute towards identified office premises demand (low growth scenario – 31,700 sqm, central growth – 48,400 sqm and 65,800 sqm). Therefore, it is likely that some employment floorspace will be retained on the site once redeveloped but at a much higher standard to meet modern day requirements. However, it is considered the re-provision of employment uses should be based on an equivalent number of jobs and not an equivalent quantum of floorspace, as SME workspace/office premises would have a higher employment density than the existing industrial/distribution use.
- Given the relatively low density of the current built form, redevelopment of the site would make a significant contribution to housing targets and wider regeneration objectives of designated focal points, including making more efficient use of brownfield land in conformity with sustainable planning principles but also to achieve a better relationship with the surrounding land uses. In terms of proposed residential provision, the redevelopment of the site would deliver much needed affordable housing, family sized units and wheelchair accessible homes.

## **Conclusion**

In summary, we request that the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas, in particular for the site at 37 Lombard Road, as this will enable the site



to be redeveloped for a mixed use scheme which will deliver a number of benefits to the Lombard Road/York Road Riverside Focal Point.

If you require any additional information please do not hesitate to contact Guy Bransby on 020 7399 5409 or Jennifer Watson 020 7399 5346 of these offices. We look forward to receiving acknowledgement of our submission.

Yours faithfully,

**JLL**

Enclosures

- Appendix 1 – Site Location Plan

## Appendix 1 – Site Location Plan

