

The Battersea Society



reply to: planning@batterseasociety.org.uk

14 November 2016

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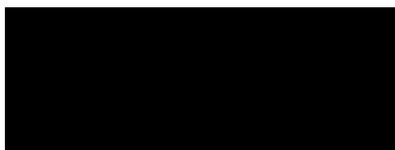
Dear Adam

Local Plan: Employment and Industry review - policy options consultation (Oct 2016)

At the Planning Forum you kindly said you would accept late comments on the Employment and Industry Review from the Battersea Society, although we had passed official deadline.

We found it an interesting and extensive document. We have therefore focussed very much on the questions that bear directly on Battersea. These are attached as a separate document. We look forward to hearing about the wider response you received and how this will feed into the local plan review.

Best wishes



Liz Walton

Chair Battersea Society Planning Committee

cc: Planning Policy

Battersea Society response to Wandsworth Local Plan: employment and industry review – policy options consultation (Oct 2016)

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

The Battersea Society considers that this area should continue to retain its strategic status as an employment area. Its mix of small and larger firms offers significant employment opportunities and a mix of services to the immediate locality and more widely to central and south west London. It is relatively self contained, accessible and its uses do not generate significant nuisance to local residents. As smaller businesses in Nine Elms and elsewhere in Battersea, for example the Lombard Road area, are squeezed out by new development, this area will gain further significance.

Question 11

Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

We support the wider regeneration of the area with industrial and distribution sites focussed on the SIL. However we consider that the protection of existing employment and potential for new jobs, including in the industrial and distribution sectors, should be a critical part of examining applications for development across the whole of the opportunity area (as has happened for example with the redevelopment of the CGMA site). In addition, care should be taken to ensure that where new development results in the displacement of small firms and existing employment bases (e.g. Sleaford Street, Palmerston Court) alternative viable premises are offered, preferably locally. The Society welcomes the inclusion of incubator units within some of the new developments. Significant revision of existing planning permissions to reduce employment opportunities by replacing approved commercial space with additional residential units should be resisted on larger development sites.

Question 13

Should the clusters and sites identified above be protected for industrial and distribution uses?

The Battersea Society consider that C21: 99-109 Lavender Hill (Battersea Business Centre) should continue to be protected as it provides a high density cluster of small business units for a wide range of businesses and services from start up to long term established companies in the buildings. These provide a wide range of units for local entrepreneurs at accessible levels of rent

Question 14

Should this include specific protection for such uses located in railway arches?

The potential of the extensive space in railway arches available across the Borough should continue to be protected and realised. Consideration should be given to freeing up unused arch space as potential relocation for SMEs displaced, for example, from MUFIEAs where industrial uses are no longer being protected. Efforts should be made to ensure that displaced businesses are offered alternative accommodation at rents affordable relative to those they have had to move from.

Question 15

If so, should the Local Plan allow change or redevelopment to non-industrial uses provided that there is no demand for the industrial or distribution use? Should redevelopment of these sites prioritise alternative employment uses?

The main protection should be to resist pressure to redevelop these sites for non-employment use or

conversion to purely residential.

Question 17

Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

Traditionally Battersea has sustained a mix of housing types and tenures alongside light industrial and office uses and we would hope this social mix and balance can be retained as far as possible. In order to maintain a range of local employment we would support redevelopment of units to a higher density on existing sites rather than relocating business to areas outside the Borough. There needs to be protection, however, against consequent increases in noise, traffic generation outside normal working hours and near to existing residential areas.

Question 18

**Should the Local Plan seek to protect offices in the following locations:
Town Centres;
The part of the Central Activities Zone that is in Nine Elms;
Focal Points;
Smaller office clusters near transport interchanges or on the edge of town centres?**

Yes

Question 21

Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

Yes but see response to Q 11 above

Question 36

On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor? Are there other design and management issues that should be taken into account for large-scale mixed use schemes?

Care is needed to ensure that potential nuisance from long and anti-social hours of working, operations noise, traffic movements etc is recognised in the physical design of buildings (i.e. commercial access points not sited immediately below bedroom units on residential floors etc). Commercial /private areas need to be physically and securely separate including for example discrete visitor parking, drop off, delivery and service areas for residents and for businesses. A criticism of many of the new large scale mixed developments, for example in Nine Elms and Lombard road area, is that these elements of plans are not well understood and too frequently actually absent from proposals put forward.

Question 37

Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

Question 38

If so, should this floorspace be of a particular type or size?

Our particular interest is the regeneration of the Winstanley Estate. A word search of the preferred option includes no reference to employment as such and the only reference to 'work' is in relation to the library providing potential space in which to work - perhaps this should read 'study'? A major regeneration project such as the Winstanley should not be as narrowly conceived as the current proposal which focusses almost totally on housing and open space, There is little integration with

complementary employment and business support opportunities for Winstanley residents, either within the designated regeneration area or in locally accessible employment areas. Some small workshop spaces should be provided within the total scheme and greater opportunity made of the potential of the railway arches in Grant Road, not merely for retail but for use by incubator business and local start ups. Likewise there should be a strong strategic location based employment policy to assist residents access nearby employment and business areas. This could include opportunities arising from the business space proposed on developments within Plantation Wharf and elsewhere in the Lombard Road SPD area. The economic development department has such policies but they do not appear to be adequately reflected in the regeneration documents so far presented.

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

Yes. A primary objective should be to provide creative workspace suited to local residents, both those already in professional and creative industries and those seeking to set up in these sectors. There has been significant success in attracting such uses in the new developments in Nine Elms, around Battersea Bridge Road/ Parkgate Road and York Road. Such space may also offer the benefit of related employment opportunities in support services such as again may be well suited for those living locally.

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

Every effort should be made to encourage developers to include such space within developments. Battersea is deficient in both cinema space and in small halls for use by local performance groups. S106 /CIL should be used to support such provision where applicable.

Question 41 (and 42 - 44)

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

Yes. Provision of different types and size of workspace combined with business models which build in cross subsidy to allow initial rent free or highly subsidised rent structures for start -ups should be a condition of new business developments. Retention of clusters such as the Battersea Business centre also helps retain lower rent units.

Question 45 (and 46 -7)

Should the Local Plan require managed workspace to be provided on new developments in the borough?

Certainly on major regeneration schemes and mixed use development

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

Question 49

Are there other designations that would be more appropriate for the Havelock Terrace area?

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

Question 51**Should the Local Plan allow residential uses in any part of the SIL?**

If the Palmerston Court development is approved and built then these questions are too late as there will be a large element of residential injected locally. Although that site is just outside the SIL it effectively is part of the totality of employment in this part of Battersea. In principle designation of this and possible areas further south within the SIL as an Industrial Business park makes sense given the coming of Apple and other potential secondary business services generated by the Power Station, CGMA etc. We would generally oppose any replacement of existing non-residential uses with new housing within the SIL on grounds that the mix of uses could generate poor quality environment for residential development and loss of employment potential in this part of the Borough.

Question 52**Are there opportunities for further consolidation of industrial and other uses in the SIL? If so, how can this be realistically achieved and how would it contribute to intensification of employment uses, improvements to access and upgrading the quality of the public realm in and around the SIL?****Question 53****Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?**

Generally we would support greater intensification of uses in the area where this does not cause major knock on effects in terms of significant increases in heavy traffic, deterioration in air quality and noise pollution and offers greater opportunities for small local service companies.

Question 56**Should the Local Plan continue to protect the function of New Covent Garden Market (following the implementation of the consolidation project recently granted planning permission)?**

Yes it is strategically important both locally and for London as a whole. It also moderates the impact of the dense housing developments in Nine Elms.

Question 63**Should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review?****Question 64****Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?****Question 65****Should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review?**

We agree these safeguarding policies should be retained and given fuller consideration as part of the Local Plan review.

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