

Full Name	Company / Organisation	Doc section	Question	ID	Comment
Mr Peter Carpenter	Putney Labour Party	Question 1	Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?	EILP31	Wandsworth should base its policy on a growth scenario between the Central and High growth scenarios. i.e. a requirement for industrial land of around 3.5 hectares and a supply of office premises of around 57,000 sq ms.
Mr Peter Carpenter	Putney Labour Party	Question 2	What impact would the decision to leave the EU have on the preferred growth scenario?	EILP32	The decision to leave the EU is unlikely to have any significant impact in the long term 15 year timescale covered by the plan, although it may have an adverse impact on growth in the short term 1-5 years.
Mr Peter Carpenter	Putney Labour Party	Question 3	Do the findings of the ELPS and other recent evidence in any way undermine the strategic objectives set out in section 6 above?	EILP33	No.
Mr Peter Carpenter	Putney Labour Party	Question 4	Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?	EILP34	Yes, these are required to maintain a pool of land for the future expansion of industrial land that is forecast in the high growth scenario.
Mr Peter Carpenter	Putney Labour Party	Question 5	Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?	EILP35	No, the existing areas should be sufficient to accommodate forecast growth into the future.
Mr Peter Carpenter	Putney Labour Party	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?	EILP36	This area which is hemmed in by the railway is appropriate to maintain its existing designation as a Strategic Industrial Location.
Mr Peter Carpenter	Putney Labour Party	Question 7	Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?	EILP37	The Wandsworth Gasholder site should be prioritised for re-designation. I would be more cautious about re-designating the bingo hall because of the potential knock on effects on adjacent sites.
Mr Peter Carpenter	Putney Labour Party	Question 8	Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?	EILP91	No. Further redesignation would impact on the ability to deliver the land required for potential industrial expansion under the plan growth scenarios.
Mr Peter Carpenter	Putney Labour Party	Question 9	Are there any other sites or areas within other LSIA's that should be prioritised?	EILP93	No further redesignations at this stage would prejudice the ability to make available sufficient industrial space

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					to meet the potentially forecast requirement over the 15 year plan period.
Mr Peter Carpenter	Putney Labour Party	Question 10	Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?	EILP92	Yes, but subject to my comments on Questions 48-53.
Mr Peter Carpenter	Putney Labour Party	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?	EILP38	Yes, subject to the continued protection of the New Covent Garden Market.
Mr Peter Carpenter	Putney Labour Party	Question 12	Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?	EILP39	Yes, but release should be gradual and achieve over a longer period than the 15 year planning horizon.
Mr Peter Carpenter	Putney Labour Party	Question 13	Should the clusters and sites identified above be protected for industrial and distribution uses?	EILP40	The Warriner Gardens site has the potential for de-designation. I would be cautious about de-designating other sites.
Mr Peter Carpenter	Putney Labour Party	Question 14	Should this include specific protection for such uses located in railway arches?	EILP41	Yes. These are a valuable asset.
Mr Peter Carpenter	Putney Labour Party	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?	EILP42	Yes, but redevelopment should be for other commercial uses which protect employment. The sites are not suitable for residential use.
Mr Peter Carpenter	Putney Labour Party	Question 16	Are there reasonable justifications for exceeding the low growth demand forecast, either for individual sites or cumulatively? Should any of the sites recommended for re-designation in the Employment Land and Premises Study be retained for industrial and distribution use?	EILP43	Yes. The likelihood is that the extensive regeneration occurring in Wandsworth over the plan period will draw in additional industrial and commercial requirements to support the expansion, so any plan should embrace the medium to high growth scenarios. There is no justification for reducing the overall amount of land reserved for industrial and distribution use. Any de-designations should therefore be complemented by new designations to maintain the overall amount of land available for industrial and distribution use.
Mr Peter Carpenter	Putney Labour Party	Question 17	Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further	EILP44	Yes, there are opportunities for intensification on some sites and some distribution functions could be moved outside the borough given the integrated nature of the

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			intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?		London economy. But any such policy will need to be integrated with the Local Plans of other Boroughs and the London Plan to avoid attempting to rob Peter to pay Paul.
Mr Peter Carpenter	Putney Labour Party	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?	EILP99	Yes, these are all areas where office employment will benefit the local community.
Mr Peter Carpenter	Putney Labour Party	Question 19	Are there other parts of the borough where existing offices should be protected?	EILP45	There should be a general presumption of protection of office space except in areas where former residential space has been converted into offices.
Mr Peter Carpenter	Putney Labour Party	Question 20	Should the Local Plan seek to protect B1a and A2 uses located above shops and outside protected shopping frontages? If so, which locations would be most appropriate to protect?	EILP46	Yes, these uses should continue to be protected in Town Centres and local shopping parades.
Mr Peter Carpenter	Putney Labour Party	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?	EILP47	Yes, but it should be considered as a contribution to the London requirement, not to the specific office requirements for local employment in Wandsworth.
Mr Peter Carpenter	Putney Labour Party	Question 22	Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?	EILP48	No. Pressure from property developers to maximise profits has resulted in office space being squeezed out of developments. Wandsworth planning policies should ensure that redeveloped spaces reprovide existing office space and provide for the additional office space requirement forecast.
Mr Peter Carpenter	Putney Labour Party	Question 23	Are there specific sites in or on the edge of the borough's town centres, or in the other areas listed above, that have the potential to contribute to the demand for local and sub-regional office floorspace[1]?	EILP51	Planning policies should ensure that developments in Town Centre sites retain at least their existing office floorspace. Expansion of office floorspace should be focussed on edge of centre sites and sites located close to existing and forthcoming transport centres. Crossrail 2 will provide significant opportunities for the expansion of office space, but this is unlikely to be delivered until

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					towards the end of the pain period, so reliance on it should not be factored into the office space expansion plans.
Mr Peter Carpenter	Putney Labour Party	Question 24	Are the areas listed above the most appropriate for new office development?	EILP52	Most of the industrial sites will continue to be required to meet forecast demand, so we should be cautious about redesignating industrial sites for office use, though there may be scope for dual use in some locations where the office use supports the industrial use.
Mr Peter Carpenter	Putney Labour Party	Question 25	Are there other areas or sites that the Local Plan should seek to designate for new office development?	EILP53	The Bus Garage off Putney High Street. This could be replaced by intensification of the use of the Wandsworth bus garage site.
Mr Peter Carpenter	Putney Labour Party	Question 26	Should the Wandsworth gas holder site and the former bingo hall site in Bendon Valley be re-designated as Employment Intensification Areas, seeking increased quantities of employment floorspace alongside other uses?	EILP54	Yes. The Wandsworth Gas Holder site is particularly well located for such intensification.
Mr Peter Carpenter	Putney Labour Party	Question 27	Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?	EILP55	The surrounding areas of the Wandsworth Gasholder site and the former Bingo Hall in Brendan Valley are already well used, so probably would not benefit from re-designation.
Mr Peter Carpenter	Putney Labour Party	Question 28	Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?	EILP56	The MUFIEA designation seems to have resulted in a considerable amount of residential rather than office building on these sites. Redesignation as an Employment Intensification Area would encourage office, rather than residential development.
Mr Peter Carpenter	Putney Labour Party	Question 29	What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?	EILP57	There would be no advantage in redesignation of the areas if housing provision were to be allowed.
Mr Peter Carpenter	Putney Labour Party	Question 30	Should the reviewed Area Spatial Strategy and site allocations address all or some of the following issues: Pedestrian and cycle access to the Thames from Wandsworth Town Centre; Access to the Wandle; The creation of new public spaces and routes	EILP58	Yes. All of these are relevant.

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			through the area; Enhancement of the Wandle and its banks as a resource for wildlife; Biodiversity and environmental issues; Layout of development; Mix and arrangement of uses across the area; Use allocations for individual sites; Analysis of the historic environment and character of the area; Place-making initiatives such as cultural uses and activities.		
Mr Peter Carpenter	Putney Labour Party	Question 31	Are there any additional issues that should be addressed through the Area Spatial Strategy and site allocations?	EILP59	Density of development. Both height and spacing of buildings.
Mr Peter Carpenter	Putney Labour Party	Question 32	Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?	EILP94	None that immediately come to mind.
Mr Peter Carpenter	Putney Labour Party	Question 33	Do the proposed routes and spaces set out in the adopted Area Spatial Strategy give the optimal arrangement for the area? Are there alternative approaches that should be explored?	EILP60	The Wandle Delta strategy fails to provide a continuous Thameside path, and should be amended to do so.
Mr Peter Carpenter	Putney Labour Party	Question 34	Should a similar area spatial strategy and/or site allocation be set out for the former bingo hall site in Bendon Valley? If so, are there issues specific to this site that these should address?	EILP61	If the site is to be redesignated, then a spatial strategy and site allocation needs to be developed for the former Bingo Hall site.
Mr Peter Carpenter	Putney Labour Party	Question 35	Should the Local Plan continue to specify requirements relating to design, rent levels, leasing and management of new employment premises? If so, are there any requirements that should be set in addition or instead of those given above?	EILP62	Yes. There should be some guidance about what is meant by 'realistic rents'.
Mr Peter Carpenter	Putney Labour Party	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	EILP63	Yes. There has been pressure to convert ground floor employment uses to residential in some sites with a significant loss of their employment potential. Segregating office and residential in separate buildings could help mitigate this.

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			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?		
Mr Peter Carpenter	Putney Labour Party	Question 37	Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?	EILP64	Yes. Otherwise we will create dormitory areas. Particular attention should be paid to providing incubator space for new and growing companies.
Mr Peter Carpenter	Putney Labour Party	Question 38	If so, should this floorspace be of a particular type or size?	EILP65	As indicated above as well as retail and office space, some incubator space should be provided. Units should be large enough to generate a viable employment environment, say 1,000 sq m.
Mr Peter Carpenter	Putney Labour Party	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?	EILP66	Yes. Creative employment is likely to form an increasing proportion of employment going forward. Given that 5.7% of the workforce is currently employed in this area and they are a relatively intensive user of space, 10% might be an appropriate allocation. This could be secured by S106 agreements.
Mr Peter Carpenter	Putney Labour Party	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?	EILP67	Yes. There is the opportunity to return former cultural assets such as the Gym on Wandsworth High Street and the Bingo Hall in Mitcham Road and possibly the former Bingo Hall in Bendon Valley to Theatre and cultural use. This could be encouraged by restrictions on the type of development allowed on these sites and the use of S106 agreements on related developments to fund bringing them back into use.
Mr Peter Carpenter	Putney Labour Party	Question 41	Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?	EILP68	Yes. Otherwise local employers will be driven out of the area with adverse knock on effects on retail.
Mr Peter Carpenter	Putney Labour Party	Question 42	If so, should this be on developments of a particular type or size, and in particular parts of the borough?	EILP69	We should continue to ensure that Town Centre space is reserved for local businesses, but to ensure affordability this might be on secondary frontages. The continued

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Mr Peter Carpenter	Putney Labour Party	Question 43	How should affordable workspace be secured – for example through s106 agreements?	EILP70	S106 agreements will have a role in securing affordable workspace in new developments. In existing developments continued use can be secured through the designation process.
Mr Peter Carpenter	Putney Labour Party	Question 44	Should managed workspace (see below) be considered to be affordable, or are there other criteria that should be set – for example setting a maximum percentage of market rent?	EILP71	Managed workspace is not always affordable as management charges can be high. It would be better to secure it by setting a maximum percentage of market rent as is done with 'Affordable Homes'.
Mr Peter Carpenter	Putney Labour Party	Question 45	Should the Local Plan require managed workspace to be provided on new developments in the borough?	EILP72	Yes, but it is probably not appropriate to provide it on all new developments, only on the larger ones. Managed workspace is probably better located at edge of Town Centre locations.
Mr Peter Carpenter	Putney Labour Party	Question 46	If so, should this be on developments of a particular type or size, and in particular parts of the borough?	EILP95	It should be on the larger developments which can support a viable level of managed workspace. These are likely to be located at the edge of Town Centres to ensure affordability.
Mr Peter Carpenter	Putney Labour Party	Question 47	How should managed workspace be secured – for example through s106 agreements?	EILP73	Managed workspace should be specified as a % of the employment space mix, say 10% in the planning guidance for specific sites. It's continued use as such could be secured through S106 agreements.
Mr Peter Carpenter	Putney Labour Party	Question 48	Should the Havelock Terrace area be designated as Industrial Business Park?	EILP74	There is merit in designating Havelock Terrace as an Industrial Business Park as recommended by ELPS.
Mr Peter Carpenter	Putney Labour Party	Question 49	Are there other designations that would be more appropriate for the Havelock Terrace area?	EILP96	No, but it could retain its existing designation.
Mr Peter Carpenter	Putney Labour Party	Question 50	Should any other parts of the SIL be redesignated as Industrial Business Park?	EILP75	The Industrial Business Park designation could be extended to other parts of the SIL where appropriate.
Mr Peter Carpenter	Putney Labour Party	Question 51	Should the Local Plan allow residential uses in any part of the SIL?	EILP76	No. It is best to avoid mixing industrial and residential uses as it can lead to considerable friction between the two types of users. The development of flats close to the Western Riverside Waste disposal facility in Smugglers Way has caused friction with the new residential tenants.

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Mr Peter Carpenter	Putney Labour Party	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?	EILP78	REdesignating part of the Stewarts Road area as Industrial Business Park might facilitate the redevelopment which has not yet come to fruition.
Mr Peter Carpenter	Putney Labour Party	Question 53	Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?	EILP77	Yes. The forecasts show a continuing requirement for these uses.
Mr Peter Carpenter	Putney Labour Party	Question 54	Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within Locally Significant Industrial Areas?	EILP97	Given the potential shortfall of industrial space over the plan period it is appropriate to retain this provision, though replacement could be provided on an adjacent site.
Mr Peter Carpenter	Putney Labour Party	Question 55	Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in Locally Significant Industrial Areas?	EILP98	Yes, given the potential shortfall in industrial land over the plan period.
Mr Peter Carpenter	Putney Labour Party	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)?	EILP79	Yes. This is an important site for wholesale distribution and should continue to be protected.
Mr Peter Carpenter	Putney Labour Party	Question 57	Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?	EILP80	Yes, but the marketing requirement could be extended to 2 years and the owner should need to demonstrate he has taken all reasonable efforts to market it.
Mr Peter Carpenter	Putney Labour Party	Question 58	Should any additional criteria be included, for example demonstrating that the premises are vacant, or marketing the premises for redevelopment including an employment element?	EILP81	There should be an 'all reasonable efforts' requirement to market it.
Mr Peter Carpenter	Putney Labour Party	Question 59	Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?	EILP82	To demonstrate 'all reasonable efforts' the owner would have to provide details of marketing spend and when and where it was made.

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Mr Peter Carpenter	Putney Labour Party	Question 60	Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?	EILP83	Yes in Town Centres employment space should continue to be protected.
Mr Peter Carpenter	Putney Labour Party	Question 61	Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?	EILP84	Yes, but there may be areas where more flexibility is required. An alternative use is preferable to a peerperpetually empty building.
Mr Peter Carpenter	Putney Labour Party	Question 62	Are there other places or situations in which alternative uses for redundant employment premises should be restricted?	EILP85	Where the proposed alternative use would conflict with adjacent uses.
Mr Peter Carpenter	Putney Labour Party	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?	EILP86	Yes, it is sensible to await the London Plan review before reviewing these.
Mr Peter Carpenter	Putney Labour Party	Question 64	Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?	EILP87	Yes, it is sensible to await the review of the London Plan before reviewing these.
Mr Peter Carpenter	Putney Labour Party	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?	EILP88	Yes, it is sensible to await the review of the London Plan before reviewing these.
Mr Peter Carpenter	Putney Labour Party	Question 66	Do the policy options set out in the sections above accurately reflect the evidence base?	EILP89	Yes, subject to the comments I have made.
Mr Peter Carpenter	Putney Labour Party	Question 67	Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?	EILP90	I have no further suggestions at this stage.