

PD10208
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04 November 2016

Planning Policy
Housing & Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir or Madam,

LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS CONSULTATION (OCTOBER 2016)

We write on behalf of our client, S G Capital Group Limited. Our client has an interest in the land at 150A - 170 Penwith Road & 2 - 8 Thornsett Road, Earlsfield, SW18 ('the site'). A location plan is appended to this letter.

This site is the subject of a current application for mixed-use development, reference 2016/5444. The site was promoted for redevelopment in the Council's 'call for sites' in June 2016.

The site extends to 0.24 hectares, which is equivalent to 0.006 per cent of the Borough's supply of designated Locally Significant Industrial Areas ('LSIA') land, and less than five per cent of the total land within the Thornsett Road LSIA. It is currently occupied by a linear building along Thornsett Road with frontage hardstanding. This is sub-divided into 4 x B Class units, providing 577 sq m of floorspace. To the Penwith Road frontage is a large area of hardstanding and single-storey garage and a single storey reception building (210 sq m), all of which are associated with a car repair / MOT centre use (B2 / *sui generis*).

The purpose of LSIA's, as set out in current local plan policy, is to resist the loss of B-class uses and to restrict the introduction of other uses. At a national and regional level, however, there is a clear imperative to optimise the potential of sites to accommodate development and maximise economic, social and environmental benefits. Strategic policy thus seeks to ensure that best use is made of previously-developed land, with growth directed towards higher order centres, notably District Centres such as Earlsfield.

Given that the Council's consultants are recommending that a proportion of the borough's SLIA land be released selectively from its current restrictive industrial designation, we consider that there are strong grounds for removing the subject site of this representation from the Thornsett Road LSIA as part of this review.

Locational factors - such as the site's proximity to existing residential dwellings - mean that it is entirely unsuitable for activity that will give rise to amenity issues (eg uses in Class B2) and therefore it is at odds with

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the purpose of LSIA designation. Moreover, the site's spatial position within the District Centre means that it is appropriately positioned to accommodate a more intensive mix of town centre uses. This can include Class B1 uses which the Use Class Order 1987 specifically notes as uses that "*can be carried out in any residential area without detriment to the amenity of that area*". Accordingly, the client has put forward a specific option for redevelopment which proposes the like-for-like re-provision of commercial floorspace within a larger mixed-use scheme. That accommodation would be built to a modern standard and capable of meeting many occupier requirements.

In these circumstances, we do not consider that a single use designation of this site is appropriate. The alternative approach, which requires the release of a *de minimis* component of LSIA in a manner that would not compromise the general purpose of the wider Thornsett Road LSIA, would yield greater benefits than maintaining *status quo*, and it would address multiple planning policy imperatives.

In addition to proposals for changes to the designation, we consider that the Council's policies relating to LSIA's should be recast to allow greater flexibility for other uses on these sites. We note that the adopted Core Strategy's strategic objective is to maximise the employment potential of land in the Borough. The absolute protection of LSIA sites for industrial / storage uses only is not the most effective way to ensure future development helps to meet this objective.

We note, as does the consultation study, that the Borough has experienced a significant loss of B1a floorspace as a consequence of national changes to permitted development rights. This review therefore provides a timely opportunity to redress the current imbalance through allowing greater flexibility within LSIA's; a change that would also encourage significant investment and regeneration in these areas.

We would be pleased to engage with officers to discuss the Council's emerging Employment and Industrial policies in more detail. If you have any queries regarding the content of this representation, please contact Jeremy Evershed or Tim Chilvers at this office.

Yours faithfully,



Montagu Evans LLP

Site Location Plan

150A - 170 Penwith Road and 2 - 8 Thornsett Road
London, SW18

