

Wandsworth Local Plan



Consultation Report

Employment and Industry Review – preparation stage (policy options consultation)

March 2017

Local Plan: employment and industry consultation report

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1 Introduction

1.1 Wandsworth Council is producing a new Local Plan document covering employment premises and industrial land. The new document will form part of the Local Plan for Wandsworth, setting out relevant planning policies and allocating sites. It will replace the employment and industrial land policies in the existing Local Plan documents.

1.2 The production of the new Local Plan Employment and Industry document goes through a number of stages, set out below. The first part of stage 1 was a public consultation, carried out in December 2015/January 2016, for which a consultation report has already been published. The first consultation covered the reasons for the review, how the review was proposed to be carried out and the timetable for this work, the existing Local Plan policies that are intended to be replaced and the proposed areas for the review. It was carried out in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.3 This was followed by a Policy options consultation between 7 October and 4 November 2016. This second consultation set out a broad set of policy options and asked 67 specific questions about the policies and has been carried out in accordance with the council's adopted Statement of Community Involvement. This was a non-statutory consultation, to complement the earlier Regulation 18 consultation and explore the issues in further detail.

1.4 This consultation report summarises the 45 responses that were received. For each issue, a response to the matters raised is given, detailing how Wandsworth Council intend to pursue the issue in the proposed submission version of the Local Plan document.

1.5 The full text of each response is available online at www.wandsworth.gov.uk/employmentlandreview.

Stage	Exercise	Timeframe
Stage 1: Preparation	Regulation 18 preparation stage consultation	Dec 2015 - Jan 2016
	Employment Land Study (AECOM)	Apr 2016 - Jul 2016
	Call for sites	Jun 2016 - Sep 2016
	Policy options consultation	Oct 2016
Stage 2: Publication	Publish submission version	Mar 2017
	Regulation 19 submission version consultation	Mar - Apr 2017
Stage 3: Examination	Submission to Secretary of State	Oct 2017
	Examination	Dec 2017 - Apr 2018
Stage 4: Adoption	Adoption	Jul 2018/Dec 2018

2 Consultation statement

2.1 For both the preparation stage consultations - the initial Regulation 18 consultation in December 2015-January 2016 and the policy options consultation in October-November 2016 - invitations to make representations were sent to every person and organisation contained in the Council's local plan consultation database. This included:

- The relevant 'specific consultation bodies', such as the Mayor of London, neighbouring boroughs, the Environment Agency, Historic England, and more;
- The relevant 'general consultation bodies', such as business organisations, amenity societies and residents' groups;
- Individual residents and businesses in Wandsworth.

2.2 In addition, there are various land owners, developers and their agents contained in the consultation database. The full list of bodies and persons invited to make representations for both stages are available on the Council's website at www.wandsworth.gov.uk/employmentlandreview. All bodies and persons were invited to make representation either by email or letter.

3 Main Issues

3.1 The key themes raised in the initial Regulation 18 consultation carried out in December 2015-January 2016 are set out in the Preparation Stage Consultation Report, which is available on the Council's website at www.wandsworth.gov.uk/employmentlandreview. The responses to the Regulation 18 stage consultation informed the questions set out in the policy options consultation.

3.2 The responses to each of the 67 questions in the policy options consultation are summarised in the next section, with a response by the council to the detailed issues raised. The main issues raised in the policy options consultation were as follows:

Growth projections

3.3 The Employment Land and Premises Study (ELPS) 2016, commissioned from AECOM, identified three growth projections for the amount of land required for industrial uses and for office floorspace over the next 15 years. Different respondents supported different growth projections, although no respondents suggested that the growth projections were wholly incorrect. Some respondents suggested that there should be flexibility built in to the policies in the Local Plan Employment and Industry Document, to respond to changing economic circumstances. It was also recognised by some respondents that the decision to leave the European Union could create unpredictable outcomes for demand for economic uses.

3.4 To address these issues, the Local Plan Employment and Industry Document (LPEID) has used the growth projections as a broad indication of likely demand for economic uses for the lifetime of the plan, rather than identifying one particular growth projection as the most likely level of demand. This is discussed in full in section 1.4 of the LPEID and reflected in policy EI1 of the LPEID.

Re-designation of industrial land

3.5 Many responses discussed which areas of industrial land should continue to be protected for industrial uses and which areas were suitable for re-designation for a broader mix of uses. Some respondents were of the view that - given the projections in the ELPS, the London Plan benchmark for release of industrial land, or significant recent loss of industrial land - all or most of the land currently in industrial uses, or protected for industrial use in the adopted Local Plan, should be protected. Other respondents suggested that a more flexible approach should be taken.

3.6 Most respondents supported continued release of industrial land in the Nine Elms area (in line with its designation in the London Plan as an opportunity area) and the remaining industrial sites designated as Mixed Use Former Industrial Employment Areas (MUFIEAs) in the adopted Local Plan, although some concerns were raised that too much industrial land had been released and that insufficient replacement employment floorspace had been provided.

3.7 There was general support for the re-designation of parts of the Queenstown Road Strategic Industrial Location (SIL) as suitable for Industrial Business Park (IBP) uses.

3.8 To address these issues, the LPEID has taken a balanced approach to the re-designation of industrial land, seeking to:

- continue protecting a large proportion of the borough's remaining industrial land, particularly where it is well used by industrial businesses;
- continue the approach of releasing industrial land at Nine Elms and allocated as MUFIEAs in the adopted Local Plan, in order to meet the strategic objectives and wider regeneration benefits for these areas;
- re-designate the Central Wandsworth Locally Significant Industrial Area (LSIA) and part of the Bendon Valley LSIA, as these contain under-utilised sites that are not intensively used for industrial business, but ensure that the redevelopment of these sites provides an increase in industrial floorspace overall;
- re-designate the Havelock Terrace and Safestore, Ingate Place parts of the SIL as suitable for Industrial Business Park uses to encourage more intensive use and investment in these areas, while ensuring that redevelopment provides industrial floorspace;
- protect smaller industrial sites that are not protected in the adopted Local Plan, where they are well connected or form part of a cluster of economic uses (including railway arches).

3.9 Together, this approach will ensure that unproductive employment sites are not unduly protected, that investment is encouraged in industrial sites, that new industrial floorspace is created in appropriate locations and that industrial land that is well used and successful continues to be protected.

3.10 This issue is addressed in policy EI3 and EI6 of the LPEID and the relevant supporting text.

How re-designated land should be redeveloped

3.11 There were mixed responses to how industrial land should be redeveloped, with some respondents supporting a requirement for increased employment floorspace alongside other uses, and other respondents seeking more flexibility to allow for a wide mix of uses on these sites. There was general support for looking at sites individually, rather than taking a one-size-fits-all approach.

3.12 In addressing this, the Council has been mindful of the on-going demand for industrial uses in the borough and the increasing demand for office floorspace. The LPEID has identified sites in the former Central Wandsworth LSIA and Bendon Valley LSIA, and one site in Wandsworth town centre, as Economic Use Intensification Areas (EUIA). This designation allows residential use in these areas while requiring the industrial floorspace or land on the site to be replaced, increased or consolidated, depending on the site characteristics and potential. Taken together, the EUIA sites should provide a net increase the amount of industrial floorspace as well as having capacity for office floorspace, which will help to meet the demand

for economic uses in the borough. Most of these sites are outside town centres and none are in Focal Points; it is not therefore appropriate to seek a wide mix of uses on these sites. This is addressed in policy EI2 of the LPEID and the relevant supporting text.

Providing new office floorspace

3.13 Respondents generally recognised the need to provide additional office floorspace in the borough, in particular to replace floorspace lost in recent years through redevelopment and permitted development. Respondents generally supported the development of a substantial amount of new office floorspace at Nine Elms to meet the growing market for office floorspace in central London. Some respondents emphasised that the regeneration of Nine Elms would create knock-on demand for more business floorspace in the wider Nine Elms and Battersea areas. Respondents also generally supported providing new office floorspace in town centres and other well-connected locations. There were mixed views as to whether the LPEID should set out specific requirements relating to design, rent levels, leasing and management of new employment premises.

3.14 To address this, the LPEID continues to encourage new office floorspace in the part of Nine Elms identified as Central Activities Zone (CAZ), town centres, local centres, and specific sites (identified with site allocations) near to town centres. The designation of parts of the SIL as suitable for IBP uses will also provide the opportunity for this area to capitalise on the increased demand for business floorspace in the wider Nine Elms and Battersea area. Appropriate requirements for how new economic floorspace should be designed, leased and managed, and how mixed use sites should be developed, have been set out in the LPEID. These issues are addressed in policies EI2 and EI5 of the LPEID and the relevant supporting text, and site allocations have been included in the document to ensure that appropriate sites provide employment floorspace.

Protection of offices

3.15 There was broad support for protecting offices in town centres and the CAZ, and to put in place an Article 4 Direction to help resist the erosion of offices through permitted development. To address this, the LPEID will protect office floorspace in town centres, local centres, the CAZ and focal points. It also introduces 'employment protection areas', where office and industrial floorspace will be protected. These are generally smaller employment sites that are well located or form a cluster of economic uses. This is addressed in policy EI3 of the LPEID and the relevant supporting text.

3.16 There was a mixed response to how redundancy of employment premises should be established, with some respondents supporting specific and rigorous approaches to establishing redundancy and others supporting a more flexible approach. Given the on-going demand for employment premises in the borough, and to provide clarity for applicants, the LPEID sets out detailed requirements for establishing redundancy of employment premises. These are detailed in policy EI7 of the LPEID and the relevant supporting text.

Requirements for creative and affordable workspace

3.17 There was some support for ensuring that new development provides workspace that is affordable and/or aimed at the creative industries. A variety of creative organisations and industries responded to the consultation raising concerns about the loss of creative workspace and the costs of workspace more generally. Some respondents suggested that there should not be an overly prescriptive approach to providing affordable workspace, and generally there was support for the development of managed workspace.

3.18 To address this, the LPEID takes a flexible approach to providing affordable workspace, requiring large-scale employment use developments to provide either a proportion of the site as managed workspace that demonstrates various affordability and flexibility characteristics, or to require these developments to provide a specific amount of floorspace at a particular rate. This approach encourages managed workspace, a growing part of the workspace market popular with Small and Medium Enterprises (SMEs), which constitute the vast majority of businesses in the borough. The LPEID also encourages the provision of creative workspace and sets requirements for appropriate site allocations to include this. This is addressed in policy EI4 of the LPEID and the relevant supporting text.

Waste and wharves

3.19 There were mixed responses about whether the waste and safeguarded wharves policies should be revised and the relevant sites reviewed, with some suggesting that the policies and allocations in the adopted Local Plan should be continued and others suggesting they should be fully reviewed at this stage. In addressing this, the Council recognises that the evidence base relating to waste policies is in the process of being updated in conjunction with the other Western Riverside Waste Authority (WRWA) Waste Planning Authorities (WPA). However this is not programmed to be finalised in time to inform the partial review but will instead be produced for a proposed full review of the Local Plan. The borough's waste apportionment figure may also change in the review of the London Plan, as may the protection given to safeguarded wharves, however it is not yet apparent what this may be or what implications it may have. Overall it is considered that the adopted policies and allocations in the Local Plan relating to waste and safeguarded wharves remain up-to-date and sound; for clarity, however, the relevant policies will be transferred to the LPEID as they are included in the Core Strategy policies that relate to employment and industry and the chapter of the Development Management Policies Document (DMPD) for industry, employment and waste. This is addressed in policy EI8 and EI9 of the LPEID and the relevant supporting text.

4 Responses to the policy options

4.1 EI1 - Strategic Approach - encouraging sustainable economic growth

4.1 The consultation document asked:

Question 1

Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

4.2 There were a range of responses to the question of the most appropriate growth scenario to plan for, with the highest number of respondents supporting the central growth scenario. Schroders Real Estate Investment Management (Schroders) considered the high growth scenario was appropriate for office floorspace while the central growth scenario was appropriate for industrial land. The Putney Labour Party (Councillor Peter Carpenter) also supported planning for central to high growth. Mr Alan Pates, South Western Estates Ltd, Charterhouse Property Group, Workspace Group PLC, TR Property Investment Trust PLC, and Ipsus Developments Ltd supported the low growth scenario. The Greater London Authority (GLA) supported planning for the central scenario. They also queried whether the latest GLA Economics forecast had been used in the ELPS and highlighted discrepancies between the projected additional jobs figures for the borough in the ELPS and those set out in the GLA's projections. The GLA also highlighted that they now expect stronger growth in London as a whole than is currently set out in published projections.

4.3 The London Borough of Richmond commented on the continued demand for office and industrial land and supported the protection of existing premises to meet that demand. The Environment Agency also made a general comment on the predicted growth in demand for office and industrial jobs.

Council Response

4.4 There are some uncertainties for the economy of London and Wandsworth over the plan period. The implications for businesses and the economy of the decision to leave the European Union remain unclear at this stage. More locally, the impact of the substantial regeneration of Nine Elms on the demand for business premises in the wider borough has yet to be borne out; this may lead to greater demand for new business floorspace than is reflected in the forecasts in the ELPS, which use projections at sector level and do not account for the impact of the transformational change at Nine Elms. Overall it is therefore considered most appropriate to use the whole range of growth scenarios to indicate the level of demand for additional employment floorspace in the borough, rather than specifying one of the three growth scenarios.

4.5 The comments of the GLA regarding employment projections and forecasts are noted. It has been confirmed with AECOM, the consultancy that produced the ELPS, that the most recent GLA Economics forecast from June 2016 were used in the study; the June forecast was published while the ELPS was being prepared and the reference to the previous GLA Economics forecast in paragraph 6.3.1 of the ELPS is a drafting error. Table 6.4 of the ELPS sets out employment forecasts at borough level and these figures were repeated in paragraph 8.6 of the Policy Options Consultation document. AECOM have confirmed that these absolute figures are potentially misleading; they are the result of an exercise to establish the rate of change of jobs (the Compound Average Growth Rate, CAGR), which is based on a combination of the sector and borough level projections produced by GLA Economics. Because of the complex process by which the CAGR is generated, the absolute figures may well differ from the GLA Economics forecasts for job increases, as was the case here. These absolute figures should not have been included in the ELPS as they are potentially misleading; however the CAGR is accurate and has produced floorspace projections for the borough that are broadly in line with the GLA's estimate of 44,000 additional sqm for 2011-2036. The proposed floorspace demand, particularly when considered alongside the additional potential identified at Nine Elms, would exceed the current GLA estimates and align with the GLA's statement that there is expected to be stronger growth in London as a whole.

Question 2

What impact would the decision to leave the EU have on the preferred growth scenario?

4.6 Several respondents (Workspace Group PLC, TR Investment Trust, Ipsus Developments Ltd, Schrodgers) indicated that they anticipate a degree of uncertainty, at least in the short-term, in regard to levels of growth following the decision to leave the EU. The Putney Labour Party (Councillor Peter Carpenter) did not predict significant long-term impacts on growth as a result of the decision to leave the EU. Mr Alan Pates considered that leaving the EU would lead to a need for reasonably-priced start-up units.

4.7 Ipsus Developments Ltd and Schrodgers suggested that the Local Plan should incorporate flexibility to accommodate the potential impacts of leaving the EU.

Council Response

4.8 It is agreed that the decision to leave the EU may lead to considerable uncertainty, both for the development industry and for individual businesses. It is therefore considered appropriate to treat the forecast figures as a broad target rather than choosing one particular growth scenario to aim for.

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?

4.9 The Putney Labour Party (Councillor Peter Carpenter) indicated that they do not believe the evidence undermines the strategic objectives. Workspace Group PLC and TR Property Investment Trust PLC suggested that the objectives in section 6 fail to acknowledge the importance of intensification on existing industrial sites as recommended in R5 of the ELPS and proposed that this be incorporated into the Spatial Vision and Strategic Objectives.

Council Response

4.10 The recommendations of the ELPS would result in a policy shift and a change in approach on specific sites; however, these changes would have a fairly narrow focus effecting only the Central Wandsworth and Bendon Valley LSIA's. Overall the evidence set out in the ELPS does not indicate that a comprehensive review of the strategic objectives or spatial vision for Wandsworth needs to be undertaken at this stage, and the wording of the strategic objectives and spatial vision incorporates a degree of flexibility that would allow for the recommendations of the ELPS to be implemented.

4.11 In their response, Ipsus Developments Ltd indicated that they do not consider the remaining parts of the Bendon Valley LSIA could successfully continue in industrial use following re-designation of the former bingo hall site for mixed use, due to the impact of the introduction of non-industrial uses. They proposed that the wider area be designated for mixed use including SME workspace and residential.

4.2 E12 - Protecting and Re-designating Industrial Land

Broad Approach to Protecting Industrial Land as SIL or LSIA

4.12 The consultation document asked:

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?

4.13 The London Borough of Richmond, Mr Alan Pates, the Putney Labour Party (Councillor Peter Carpenter), the Environment Agency and the GLA were all generally supportive of continuing to protect the identified industrial locations.

4.14 A number of developers and site owners indicated some support for continued protection of industrial areas but with caveats. Schroders advocated for an extension of the Industrial Business Park (IBP) designation for part of the Queenstown Road SIL with the remainder retaining its industrial designation. Panorama Antennas Ltd indicated support for the protection of existing industrial areas but requested the ability to permit other uses, such as commercial and residential uses, provided that the primary use remains employment. 38 Havelock Terrace Ltd requested that the policies be more flexible to accommodate the expected growth in demand for office floorspace. Workspace Group PLC and TR Property Investment Trust suggested that there should be a distinction between policies for SILs and LSIA, advocating for the re-designation of the Riverside Business Centre alongside the bingo hall in Bendon Valley and Ferrier Street. Ipsus Developments Ltd consider that it would be inappropriate to retain the remaining area of Bendon Valley as a LSIA following release of the former bingo hall site. Safestore Ltd noted that they do not consider that the current evidence base is sufficiently robust to justify the SIL and LSIA allocations and request further engagement with landowners. South Western Estates Ltd requested that the boundary of the Kimber Road LSIA be amended to remove their site at the corner of Merton Road and Burr Road from the LSIA designation. Charterhouse Property Group also made a request for the boundary of the Central Wandsworth LSIA to be amended to exclude their site at the corner of Putney Bridge Road and Point Pleasant from the LSIA designation.

Council Response

4.15 It is important to continue to provide established and thriving industrial areas with protection for industrial uses. The London Plan identifies Wandsworth as a restricted transfer borough - the highest level of protection for industrial land - as reiterated by the GLA. The SIL and most parts of the existing LSIA are in use for industrial purposes and have low vacancy rates, reflecting the demand for industrial premises in the borough. It is therefore considered appropriate to continue to protect much of this land for purely industrial uses. Where these areas are protected, it would not be appropriate to allow a wider mix of uses, as advocated in some of the consultation responses. A broader mix of uses, particularly residential, would risk eroding the industrial floorspace in these areas and lead to potential conflicts between sensitive uses and the needs of industrial businesses.

4.16 Some parts of the Central Wandsworth and Bendon Valley LSIA are not intensively used for industrial purposes and provide limited industrial business floorspace, as reflected in some of the consultation responses. By redesignating these sites for a broader mix of uses there is the potential to increase the overall amount of industrial floorspace that they provide and to encourage investment in the sort of modern industrial floorspace that businesses require. Not all sites will be appropriate for redesignation; some are too small to accommodate a mix of industrial and residential uses without compromising the operational needs of

industrial businesses, and would not have the capacity to increase industrial floorspace on site. In addition, a critical mass of purely industrial land needs to be retained in the retained LSIA's to ensure that each industrial area has the capacity to continue to function successfully.

Question 5

Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?

4.17 Mr Alan Pates suggested that other areas of small industrial and office use in the borough should also be protected, while the Putney Labour Party (Councillor Peter Carpenter) indicated they are of the view that the identified areas for protection are sufficient to meet the needs of future growth.

4.18 The GLA suggested that any industrial areas considered to merit designation as SIL should meet criteria set out in the Land for Industry and Transport SPG, and that new areas of SIL would first need to be designated in the London Plan.

Council Response

4.19 In assessing the industrial areas identified in the ELPS, it is apparent that there are no existing industrial areas outside of the established SIL and LSIA's of the equivalent size and functionality to warrant the same level of protection. There are, however, various industrial premises and smaller areas across the borough that make an important contribution to the supply of industrial floorspace in the borough and that would benefit from some protection in planning policy, given the on-going demand for industrial floorspace in Wandsworth.

4.20 The Summerstown LSIA merits consideration for designation as SIL; this will be promoted through the forthcoming London Plan as advised by the GLA.

Strategic Industrial Location

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?

4.21 The majority of respondents agreed with the Queenstown Road area remaining as SIL with Mr Alan Pates, the Putney Labour Party (Councillor Peter Carpenter), Battersea Society, the GLA, and Ipsus Developments Ltd all expressing support.

4.22 Safestore PLC questioned the evidence supporting the proposed designations and requested that these considerations be applied consistently to all areas under the Local Plan review. Safestore indicated that they do not consider that the presence of their facility at Ingate Place supports continued industrial designation and consider that this could be successfully incorporated with more mixed use in the area. Schroders considered that the current Industrial Business Park (IBP) designation should be extended along the SIL boundary to encompass Ingate Place and Havelock Terrace, thereby acting as a buffer between the remaining SIL and neighbouring residential uses. Workspace Group PLC also considered that the Havelock Terrace area of the Queenstown Road SIL should be granted flexibility to allow other employment uses in this area.

4.23 Historic England requested that an audit/characterisation of the heritage assets in this area be conducted to inform plans for the SIL and wider area. Transport for London (TfL) also raised the importance of improving pedestrian and cycle connectivity in the area.

Locally Significant Industrial Areas

4.24 The GLA requested that the map showing the location and boundary of LSIA's in the borough be labelled to help identify the individual areas.

4.25 Historic England commented that heritage assets in LSIA's should be retained and enhanced as part of any redevelopment.

4.26 TfL commented on the proposals for the reconfiguration of the Wandsworth Town Centre Gyratory and indicated that at this stage, they are satisfied that the related land-take and road re-alignments would not be impacted by the proposals for re-designation of the gas holder site. They requested that the gyratory removal scheme and potential for improved links be reflected in designations for the central Wandsworth LSIA sites.

Council Response

4.27 The SIL plays a crucial role in providing industrial land for Wandsworth, and is recognised in the London Plan as being of strategic importance for London, reflecting its location close to the Central Activities Zone and the range of uses located in the SIL. As well as industrial business premises it also contains important waste and transport sites. The loss of industrial land from the SIL would put significant pressure on the remaining industrial sites in the borough and would result in the displacement of industrial businesses and wider industrial uses. Businesses may be forced to relocate out of the borough, disrupting established supply chains, bringing increased traffic onto roads, and undermining the local economy.

4.28 The extension of the IBP to cover the Havelock Terrace and Safestore (Ingate Place) areas would both better reflect the existing mix of uses in these areas and promote investment in modern business floorspace, while retaining substantial industrial uses in these parts of the SIL.

4.29 Opportunities to improve pedestrian and cycling connectivity, and to preserve and enhance heritage assets in the borough's industrial areas, will be taken as applications come forward. The relevant site allocations will reflect the planned removal of the gyratory system around Wandsworth and the potential for improved links on individual sites and across wider areas.

4.30 The policies map will reflect and identify the precise location and boundaries of the LSIAs and SIL.

Question 7

Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

4.31 There was general support for the re-designation of the former bingo hall site in Bendon Valley (Workspace Group PLC, Ipsus Developments Ltd and Safestore Ltd), however a number of respondents cautioned against the impact of its re-designation on the integrity of the wider LSIA and neighbouring sites (Putney Labour Party (Councillor Peter Carpenter), Ipsus Developments Ltd and Safestore Ltd).

4.32 There was general support for the re-designation of the Wandsworth gas holder site (Putney Labour Party (Councillor Peter Carpenter), St William Homes LLP, Safestore Ltd, Scotia Gas Networks and National Grid), with most respondents supporting provision for mixed use regeneration of the site.

4.33 Panorama Antennas Ltd commented that their site has the potential to be brought forward faster than both the Bendon Valley and the Wandsworth gas holder sites. Their initial work has considered mixed use, employment and residential uses.

Council Response

4.34 Having analysed the responses, and in particular that of Workspace Group PLC, it is clear that the former bingo hall site, in conjunction with the Riverside Business Centre, have the capacity to provide a substantially increased quantity of business floorspace, including substantial amounts of industrial floorspace. The site is also large enough to allow for a mix of uses including residential use without compromising industrial uses on the site or in the remainder of the Bendon Valley LSIA.

4.35 The Wandsworth gasholder site includes substantial amounts of land that are under-utilised or used temporarily. Re-designation of this site is therefore considered appropriate as it could bring forward both increased quantities of industrial and business floorspace as well as a wider mix of uses including residential use. It would also assist in

securing the removal of the Health and Safety Executive hazard zones that emanate from the gas holder and the Calor Gas facilities on the site, and which prevent occupation of high-density development in the surrounding area.

4.36 It is agreed that the Panorama Antennas site could be developed quickly, and that the redevelopment of this site could act as a catalyst for investment in modern business floorspace in the area.

Question 8

Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIAs? If so, which areas and why?

4.37 The Putney Labour Party (Councillor Peter Carpenter) objected to any further re-designation of sites within the Central Wandsworth or Bendon Valley LSIAs, commenting that this would impact on the ability to deliver the land required for potential industrial expansion under the plan growth scenarios.

4.38 Callington Estates Ltd and the Callington Trust commented that they neither agree nor disagree with the re-designation of the former bingo hall site in Bendon Valley and the Wandsworth gas holder site, noting rather that in the case the former bingo hall is prioritised for re-designation, it would also be reasonable to consider their own site (53 Lydden Grove) on the periphery of the Bendon Valley LSIA for re-designation.

4.39 BAF Graphics supported the re-designation of their site at 25 Lydden Road, as well as the wider Bendon Valley LSIA generally, to provide for residential and/or mixed use redevelopment.

4.40 Ipsus Developments Ltd were of the view that the remainder of the Bendon Valley LSIA should be re-designation to provide for mixed use redevelopment alongside the former bingo hall site.

4.41 Workspace Group PLC cited the Riverside Business Centre and the entire estate as a possible site for potential re-designation and redevelopment.

4.42 TR Property Investment Trust PLC proposed that their site at Ferrier Street, part of the central Wandsworth LSIA, be considered for re-designation. They consider the site suitable for a MUFIEA-type designation, providing enhanced employment provision as well as commercial and residential uses.

4.43 Panorama Antennas Ltd supported their site at Frogmore in the Central Wandsworth LSIA retaining a principally employment/industrial designation but also requested flexibility to include commercial and residential uses.

Council Response

4.44 As discussed above, it is considered appropriate to include the riverside business centre in the re-designation of the former bingo hall site in Bendon Valley. This will allow for the site to be developed holistically, ensuring that residential uses can be separated from industrial uses, improving access to and along the Wandle, and giving business uses a more prominent street presence from Garratt Lane. Through appropriate policy and site allocation it would be possible to ensure that this would result in an increase of industrial floorspace as well as other business floorspace on the site.

4.45 Representations supporting re-designation of other sites in the Bendon Valley LSIA are noted, however there are concerns that other sites in Bendon Valley LSIA do not have the capacity to substantially increase the amount of industrial floorspace as well as provide the residential uses that respondents are promoting. Introducing substantial amounts of residential use to these smaller sites could also give rise to conflicts between the residential premises and remaining industrial sites, which could curtail the operation of industrial businesses in the area. Given the strong demand for industrial premises, as evidenced in the ELPS, allowing re-designation of parts or all of the remainder of Bendon Valley LSIA could result in a significant erosion of the capacity of the borough to meet its on-going demand for industrial premises.

4.46 It is agreed that the Ferrier Street and Panorama Antennas sites in the Central Wandsworth LSIA should also be re-designated for a wider mix of uses. The responses relating to both of these sites have demonstrated that they have the capacity to increase and invest in the industrial floorspace as well as provide residential uses, without this compromising the industrial use on the site. These are also edge-of-centre sites that could contribute to SME workspace in an appropriate location, and re-development of both sites could contribute to the wider strategic aims for spatial and public realm improvements in the Wandle Delta area.

Question 9

Are there any other sites or areas within other LSIAs that should be prioritised?

4.47 A number of respondents suggested that additional sites and areas to be prioritised for re-designation. These include: the Riverside Business Centre (immediately west of the former bingo hall) (Workspace Group PLC) in order to provide for comprehensive redevelopment across the two sites; the Ferrier Street Industrial Estate (TR Property Investment Trust PLC), on the basis that it is physically and characteristically separated from other sites covered by the generic LSIA policy designation and that mixed-use redevelopment would improve the relationship between the site and surrounding area; Point Pleasant Works Site (Charterhouse Property Group), on the basis that the use of the site currently comprises a tool hire shop (sui generis use) and that surrounding land uses would be adversely impacted by heavy industrial/warehousing uses; the Safestore site on Garrett Lane (adjacent to the

former bingo site) (Safestore Ltd) to enable the comprehensive redevelopment of the entire block and meet adopted design policies; the site at 1a Burr Road (South Western Estates Ltd) which is currently in use as a storage facility but is considered to offer an opportunity for residential/mixed use residential redevelopment use on this site as this would be more compatible to neighbouring uses; and 53 Lydden Grove (Callington Estates Ltd and the Callington Trust), on the basis that the site does not lend itself favourably to the locational requirements of such employment areas as set out in Policy DMI1.

4.48 Conversely, Mr Alan Pates noted that a large area in East Putney and Osiers Road has already been lost to employment uses and considered that any remaining space should be protected. Additionally, Mr Alan Pates considered that other space, such as that in Plantation Wharf, should also be protected before it is lost. The Putney Labour Party (Councillor Peter Carpenter) indicated that they are of the view that no further re-designations are required this stage, so as not to compromise the ability to make sufficient industrial space available to meet the forecast requirement over the 15 year plan lifetime.

4.49 S G Capital Group Limited considered that there are strong grounds for removing the site at 2-8 Thornsett Road from the Thornsett Road LSIA as part of this review, on the basis of its proximity to existing residential dwellings and its spatial position within the District Centre lending the site toward accommodating a more intensive mix of town centre uses.

4.50 The GLA directed the Council to be mindful of the Land for Industry and Transport SPG benchmark for industrial land release, noting that any further LSIA land release should be considered for mixed use where viable while exploring the potential for intensification and/or co-location of industrial activities with other uses.

Council Response

4.51 The Safestore site on Garratt Lane is a new purpose-built storage building; whilst its re-designation could allow for a more comprehensive development of the urban block that contains the former bingo hall site, it is considered unlikely that re-designating this site would allow for an increase in the amount of industrial floorspace on the site, given the current density of development.

4.52 It is agreed that the Point Pleasant Works site has limited suitability for a wide range of industrial uses, given the proximity of both residential and office buildings to the site. As a small site in a sui generis use, not surrounded by other industrial uses, the re-designation of this site is considered appropriate; however it is important that it continues to make a contribution to employment floorspace.

4.53 The site at 1a Burr Road does neighbour residential uses, however it also forms part of the group of broadly industrial uses in the Kimber Road LSIA. Re-designating this site would result in a domino effect, with residential use encroaching further into the LSIA and resulting in the loss of industrial floorspace and potential conflicts between industrial businesses and the amenity of residents.

4.54 The Thornsett Road LSIA is the smallest of the borough's protected industrial areas. The re-designation of 2-8 Thornsett Road and the introduction of residential use in this location could lead to the operation of this LSIA becoming unviable due to its reduced size and the encroachment of residential uses. The site lies outside of the Earlsfield Local Centre boundary and does not have a frontage onto Garratt Lane, which forms the main frontage for the Local Centre; a wider mix of uses would not therefore be appropriate.

4.55 The responses raising concerns about the amount of floorspace that has been lost in previous years, and identifying the demand for industrial premises and the Land for Industry and Transport SPG benchmark, are noted. It is agreed that there are opportunities to put in place further protection for smaller employment sites. Emerging policies will need to ensure that re-designated sites work hard to meet the demand for industrial floorspace as well as providing residential uses.

Question 10

Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?

4.56 Mr Alan Pates and the Putney Labour Party (Councillor Peter Carpenter) agreed that the Council should continue to protect other LSIA's in their entirety for industrial-type uses.

4.57 Conversely, and referencing the recommendations set out in the ELPS, Workspace Group PLC and TR Property Investment Trust PLC were of the view that consolidating both the SIL and LSIA designations strengthens the designation as a whole, and that de-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land. The Environment Agency and the GLA also reiterated that policy directives with respect to LSIA's should be justified by the evidence base provided in the ELPS.

4.58 Both S G Capital Group Limited and South Western Estates Ltd were of the view that there is scope to adopt a more flexible approach to development proposals within LSIA's and did not consider it necessary to protect them for industrial-type uses in their entirety. South Western Estates Ltd noted that the adoption of a more flexible approach would align with the overarching presumption in favour of sustainable development, as set out in the National Planning Policy Framework (NPPF).

4.59 Ipsus Developments Ltd were of the view that the Kimber Road and Old Sargent Road LSIA's work well as traditional industrial areas and should be protected.

Council Response

4.60 Due to the prevailing industrial character of most of the existing LSIA's, and the strong demand for industrial uses identified in the ELPS, it is considered appropriate to continue to protect LSIA's (other than the areas discussed as appropriate for re-designation above). Whilst it is appropriate to consider the existing use of industrial areas when reviewing policy, it is inevitable - due to historic uses, previous plan policies and permitted development - that not every site in each industrial area will necessarily have an industrial use. A more flexible approach, particularly allowing residential use into industrial areas, would undermine the function of those areas and restrict the range and operational flexibility of industrial businesses that could operate from these areas. The borough is also identified as a restricted transfer borough in the London Plan and allowing residential uses into protected industrial areas would run counter to the aims of this designation. The continued protection of LSIA's in the borough would not be contrary to the presumption in favour of sustainable development; rather this approach supports sustainable growth by meeting the economic needs of the borough, in particular the requirements for suitable premises for businesses in industrial sectors. Developing sites in LSIA's for a mix of uses including residential use would not be sustainable development.

Nine Elms

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?

4.61 The majority of respondents (Mr Alan Pates, the Putney Labour Party (Councillor Peter Carpenter), Battersea Project Land Company Limited (BPLCL), the Battersea Society, the GLA) indicated their general support for the ongoing support of wider regeneration objectives for Nine Elms, subject to caveats.

4.62 The Battersea Society and the Environment Agency drew attention to the possible displacement of businesses and possible relocation opportunities as redevelopment occurs. The Environment Agency raised potential issues in relation to the intensification of development and flood excavation, noting that defences may need to be raised in accordance with the TE2100 plan.

4.63 TfL indicated that they would support any effort to improve cross-connectivity, noting that an element of transport assessment may be required dependent on the scale of de-designation to update the transport study undertaken as part of the Opportunity Area Planning Framework.

Council Response

4.64 It is agreed that the regeneration of the Nine Elms area should continue to be supported. This area - together with the Vauxhall area in the neighbouring borough of Lambeth - has the potential to provide a substantial amount of new jobs and homes, a new town centre at Battersea Power Station and create a new part of central London, as set out in the OAPF. Much of the area has already been developed or consists of cleared sites, and there remain a limited number of premises in industrial use; continued support of the regeneration of Nine Elms may result in the displacement of remaining businesses, however the wider benefits for the area and the strategic benefits for London are considered to outweigh this loss.

4.65 Sites in the area have been assessed using the borough Strategic Flood Risk Assessment. The SFRA, as well as the existing flood risk policies of the adopted Local Plan 2016 (Policies DMS 5, 6, 7 and PL2) will continue to be used for flood risk assessment. These Policies include support for the implementation of the TE2100 Plan. The Policies associated with flood risk will be reviewed as part of the full review of the Local Plan.

4.66 Given that no significant shift in approach for the Nine Elms (outside of the SIL) is proposed, it is not considered necessary to undertake further transport assessment for the area. Individual transport assessments for sites will continue to be required as appropriate.

Question 12

Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

4.67 There were mixed responses to the above question. The Putney Labour Party (Councillor Peter Carpenter) and the Environment Agency indicated that they are supportive of the Local Plan continuing to allow the loss of industrial and distribution uses in the MUFIEA areas, however the Putney Labour Party suggested that the release should be gradual and achieved over a longer period than the 15 year planning horizon. Amec Staff Pensions Trustee Limited commented that the Local Plan should 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.

4.68 The GLA noted that the Borough should be mindful of the industrial release benchmark and consider opportunities for re-providing more modern industrial floorspace compatible with residential uses where viable.

4.69 Safestore Ltd commented that the existing policy provides the suitable conditions to meet the objectives of the Local Plan insofar as providing flexibility on sites to provide employment and other uses, such as residential. They were of the view that the Local Plan should continue to seek replacement industrial and distribution uses in the MUFIEA areas, where it can be demonstrated that these uses are compatible.

4.70 Big Yellow Self Storage Company Ltd commented that the boundary of the existing MUFIEA designations, including the Gwynne Road MUFIEA within which their York Road Business Centre store is located, should not be altered. They considered that given the site falls within a MUFIEA, the principle of additional residential development as part of a mixed use scheme is acceptable, where it can be demonstrated that wider regeneration benefits can result from the proposals, and noted that this is confirmed in the site specific allocation.

4.71 Mr Alan Pates commented that while there has been some employment space provided in redevelopments, it appears that either rents are too high or the space is not fit-for-purpose as this floorspace subsequently gets lost to residential conversion.

4.72 Historic England advocated for the existing heritage assets to benefit from redevelopment and new built form to be sympathetic to the historic surroundings.

Council Response

4.73 It is considered appropriate to continue to support redevelopment of former industrial sites in the MUFIEA areas. These areas are either located in Wandsworth town centre, where redevelopment of the sites is already underway, or within Focal Points near the Thames, where the remaining industrial sites have the potential to a broader mix of uses to support the regeneration aspirations for the focal points. Existing site allocations for relevant sites in focal points require replacement employment floorspace and, on appropriate sites, allow for industrial uses to be replaced where these are compatible with the relevant area spatial strategy. Whilst this approach may result in the loss of some industrial units, it is considered appropriate to continue the established approach to regenerating these areas in order to make the most of the riverside location and make better use of low density sites to contribute to the housing and employment needs of the borough.

4.74 It is agreed that rental costs for new employment floorspace can be expensive, and that the local plan review should seek affordable workspace as part of appropriate developments.

4.75 The council will continue to seek development that protects and enhances the borough's heritage assets and to secure the highest quality of design in new developments.

Question 13

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

4.76 A key theme across the respondents was the need to conduct a site by site analysis as there was mixed views among respondents regarding opportunities for protection. Mr Alan Pates, the Putney Labour Party (Councillor Peter Carpenter) and the Battersea Society noted that attractive rent levels assist new and emerging business however they cautioned that a case-by-case approach was required. The Putney Labour Party (Councillor Peter Carpenter) noted that the Warrior Gardens site has the potential for de-designation and the Battersea Society requested that the protection of Lavender Hill (C21) be continued as it provides a cluster of diverse business.

4.77 TfL consider that railway arches are outside the criteria in the Mayor of London's Land for Industry and Transport SPG (2012) and therefore do not require long term or strategic protection. Rockspring Property Investment Managers were of the view that the un-designated sites should not be protected and quoted the ELPS, which they noted suggests existing employment areas are the most suitable locations for accommodating industrial growth. Both Rockspring and TfL indicated an interest in redeveloping their sites, being C24 and C28 respectively.

4.78 London Square objected to the re-designation of the B&Q site on Swandon Way, which falls within the C23 (Map 10.15 Smugglers Way, Marl Road and Jews Row employment area, on the basis that the description and analysis for this site, and the wider C23 area, is incorrect and misleading.

Council Response

4.79 The responses advocating careful, site-by-site analysis of areas that could be protected for economic uses are noted, and it is agreed that the local plan review should not take a blanket approach to all sites. The review will look at the individual quality of sites, their location and the contribution that sites make as a cluster of economic uses.

4.80 The comments of TfL are noted, however it is not agreed that railway arches fall outside of the scope of industrial sites that should be considered for protection in Local Plan policy. The Land for Industry and Transport SPG states that a range of workspaces of different types, sizes and costs to meet the requirements of different sectors of the economy will need to be provided, and that adequate provision of a range of types of space - including railway arches, amongst other typologies - is particularly important for the entry, survival and expansion of SMEs. Railway arches in the borough provide a substantial amount of industrial and other commercial floorspace and it is considered appropriate to ensure these continue to provide industrial and business floorspace. In the CAZ and town centres, a wider mix of uses for railway arches may be appropriate.

4.81 The comments of Rockspring Property Investment Managers are noted, however it is considered appropriate to seek to protect smaller industrial areas and sites in the borough given the on-going demand for industrial premises. Whilst it is agreed that larger industrial areas are the most suitable areas to accommodate intensification of industrial uses, the smaller industrial sites in the borough make an important contribution to industrial premises.

The Jaggard Way site, which the respondent represents, provides purpose-built industrial premises that are in use and for which there is demand, and it is therefore considered appropriate to seek to protect it in the Local Plan for industrial use.

4.82 It is agreed that the C23 area contains some sites that do not currently contain economic uses and that these sites should be excluded from protection for industrial use.

Question 14

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

4.83 The majority of respondents generally agreed that provision should be made for specific protection for uses located in railway arches (Mr Alan Pates, the Putney Labour Party (Councillor Peter Carpenter), Councillor Rosemary Torrington and the Battersea Society). Specifically, Councillor Rosemary Torrington commented that protection for employment purposes was important at the Winthorpe Road arches but not necessarily for an industrial nature. The Battersea Society also commented that consideration should be given to freeing up unused arch space as a potential relocation area for displaced small and medium enterprises.

4.84 TfL objected to policy protection of railway arch sites, citing the ELPS which they note states that policy protection is unnecessary given that these sites are likely to remain in commercial uses given that there is typically an inability to convert railway arch premises to residential uses. TfL considered that sufficient flexibility is required to enable adaptation to differing types of uses and ensure conformity with the NPPF (paragraph 14).

Council Response

4.85 See the response to question 13.

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?**

4.86 All respondents agreed that the Local Plan should protect the railway arches for employment uses (Mr Alan Pates, Councillor Rosemary Torrington, the Putney Labour Party (Councillor Peter Carpenter), and the Battersea Society).

4.87 The Port of London Authority noted that the Smugglers Way small industrial cluster includes the safeguarded Pier Wharf and Smugglers Way, commenting that it would be contrary to planning policy to allow these wharves to be redeveloped.

Council Response

4.88 See the response to question 13.

Re-designation of industrial land and demand forecast

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?

4.89 Ipsus Developments Ltd, Workspace Group PLC and TR Property Investment indicated that they are supportive of planning for the low growth scenario, with Workspace Group PLC further commenting that the sites put forward for re-designation should not be retained for industrial and distribution uses. Ipsus Developments Ltd also commented that the difference between the scenarios for office space is less dramatic and, therefore, is more difficult to accurately predict the exact figure required in the future, noting that this may depend on Council aspirations for economic development in the Borough. They considered that a flexible policy that is regularly monitored could be appropriate which enables floorspace figures to be increased if there is particular market demand, given that sectors requiring office floorspace are growing.

4.90 The Putney Labour Party (Councillor Peter Carpenter) and Safestore Ltd were of the view that the medium to high growth forecast scenarios would be appropriate to plan for. However, Safestore commented that this may not necessitate additional floorspace but rather, will necessitate a more considered approach to the type of activity that will be accommodated, and therefore the designation the site is given. Safestore were of the view that in locations with appropriate characteristics, this may require greater flexibility in industrial locations to accommodate the key demand that will come from central London servicing activity, thereby enabling those that offer good accessibility to the CAZ to be flexible and change in response to demands over time. The Putney Labour Party (Councillor Peter Carpenter) noted that there is no justification for reducing the overall amount of land reserved for industrial and distribution use and, therefore, any de-designations should be complemented by new designations to maintain the overall amount of land available for these uses.

Council Response

4.91 It is considered that the growth forecasts for industrial land give a clear indication of on-going (although - in a low growth scenario - reducing) demand for industrial floorspace. Some industrial sites do offer opportunities for a broader mix of employment uses which could support the demand for office floorspace in particular as well as opportunities for more intensive industrial use, particularly on the sites that contain uses categorised as 'wider' industrial uses (such as the gas holder), which are not included in the demand projections. Overall the sites are re-designated for non-industrial uses should cumulatively be able to provide an increase in industrial floorspace that is purpose-built and better suited to modern industrial needs, which will help to mitigate the loss of land that is purely industrial in use.

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?

4.92 Schrodgers, the GLA and the Putney Labour Party (Councillor Peter Carpenter) all generally agreed that the intensification of industrial uses could be considered. Additionally, the GLA and the Putney Labour Party (Councillor Peter Carpenter) were of the view that the potential for relocations should be considered with neighbouring authorities in the relevant property market areas, in light of the relevant planning policy guidance. Workspace Group PLC and TR Property Investment Trust PLC also considered that increased flexibility and promotion of higher density developments within existing designated industrial sites would be prudent.

4.93 The Battersea Society indicated that they support the redevelopment of units to a higher density on existing sites rather than relocating business to areas outside the Borough, in order to maintain a range of local employment opportunities. They noted however, that appropriate protection needs to be in place to manage adverse environmental effects on surrounding residential areas.

4.94 Schrodgers and Ipsus Developments Ltd were supportive of exploring opportunities for the co-location of housing and industrial uses, in accordance with the Mayor's '*A City for all Londoners*' document. The GLA also indicated that they were supportive of considering co-location with other uses as part of mixed use development where appropriate.

4.95 The Environment Agency raised potential flooding issues related to intensification, highlighting that flood management measures regarding flood defences may be required.

Council Response

4.96 It is agreed that some sites have the potential to intensify industrial uses; these should be identified in the local plan review. The Council will continue to work with the business community, the GLA and neighbouring authorities to identify opportunities for relocation of those businesses that can sustainably locate in other boroughs. It is recognised, however, that many established businesses will want to remain in the borough, and the local plan should seek to encourage this, particularly on sites that are being redeveloped.

4.97 Opportunities for co-location of housing and industrial uses should be supported on appropriate sites. It is agreed that such schemes, and development in and near industrial areas should carefully consider the impact on residential uses and be designed in a way that minimises and mitigates potential conflicts between uses; the policies in the local plan review should reflect this requirement.

4.98 Flooding policies will be reviewed separately in the full review of the Local Plan. The existing flood risk policies of the adopted Local Plan 2016 (Policies DMS 5, 6 ,7 and PL2) will continue to be used for flood risk assessment. These Policies include support for the implementation of the TE2100 Plan. Any development will be assessed against the current adopted policy framework.

4.3 EI3 - Protecting Office Floorspace

Employment Protection 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?**

4.99 There was unanimous support for the protection of Town Centres and CAZ at Nine Elms and generally across the theme of office protection.

4.100 The GLA and TfL raised questions on the definition of Focal Points and additionally, TfL noted that a transport study may be necessary to further understand the connections and accessibility of these locations.

4.101 St William Homes referred to the latest GLA projections, which they noted suggest there would be a decline in industrial use coupled with an increase in the need for office floorspace, thereby supporting the protection and possible increase of office space in industrial areas.

Council Response

4.102 It is agreed that offices in Town Centres and the CAZ should be protected; this approach dovetails with the requirements of the NPPF and the London Plan. The focal points are delineated on the policies map and are considered to be an appropriate location to protect offices; all focal points currently contain clusters of office floorspace, much of which is purpose-built and good quality. Given the strong demand for office floorspace in the borough, it is considered appropriate to also protect established offices in good locations, such as on the edge of town centres and near transport interchanges, and where these form a cluster of economic uses, particularly where they provide floorspace for small businesses.

Question 19

Are there other parts of the borough where existing offices should be protected?

4.103 Councillor Rosemary Torrington noted that the Blades Court offices on Deodar Road should also be retained as offices for employment use.

4.104 Mr Bob Knowles considers that the Local Plan should make provision for workshops, studios, offices and other work spaces in an attempt to regenerate economic, creative and other productive activity in the area. Mr Bob Knowles also expresses support for the encouragement of buildings which facilitate both office or commercial space on the ground floor with residential accommodation above.

Article 4 Direction

4.105 Ms Justine Greening MP encourages the use of Article 4 Direction to protect office space. Article 4 Direction to protect office space is a consistent theme and is articulated in other statements.

Council Response

4.106 It is understood that Blades Court has been subject to numerous prior approval applications to convert offices to residential use, and that many of these have been implemented; it is not therefore considered appropriate to protect the few offices that remain in the building.

4.107 It is agreed that a wide mix of floorspace typologies should be encouraged, including floorspace for creative businesses, and that mixed use sites containing both offices and residential uses can be a successful form of development.

4.108 An Article 4 Direction to protect office space in the borough is being pursued; this is separate to the Local Plan review but will cover areas that the Local Plan review policies seeks to protect.

Smaller Offices above Shops in Town Centres

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?

4.109 There was unanimous support for the protection of B1a and A2 uses, with suggestions focused on protection of these uses in local centres to provide active space.

4.110 Richmond Council noted that there is potential for a lack of appropriate business space available within Wandsworth to meet future employment demand, which could have implications on neighbouring boroughs. Richmond Council indicated that they would support Wandsworth Council in promoting the provision of flexible business space to meet the needs of small and medium enterprises in appropriate locations. The GLA noted that viability would need to be considered and a balanced approach taken to retaining B1a and A2 uses above shops while taking steps to realise the potential for more comprehensive mixed use development.

Council Response

4.111 It is agreed that offices should be protected in appropriate locations, including local centres. New business floorspace will be encouraged to meet future demand and to help ensure that any loss of office floorspace does not cause adverse implications for neighbouring boroughs. Viability issues will need to be considered on all developments, and it is agreed that a balanced approach will need to be taken, with policy allowing change of use where offices are genuinely redundant.

4.4 EI4 - Meeting Demand for New Employment Floorspace

National & International Offices

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?

4.112 Respondents unanimously supported ongoing provision for the development of large-scale offices in Nine Elms and Battersea Power Station town centre through the Local Plan.

Council Response

4.113 It is agreed that the development of large-scale offices in Nine Elms, focussed on the emerging town centre at Battersea Power Station, should continue to be supported. Together with parts of Vauxhall the Nine Elms area has the capacity to provide a significant number of new homes and jobs, as well as creating a new part of central London. In order to secure the transformation change in this area, the VNEB OAPF envisages substantial quantities of large-scale offices to serve the central London office market, complementing the diplomatic quarter centred on the US Embassy and served by the forthcoming extension to the Northern Line which will dramatically increase the connectivity of Nine Elms to central London. Large-scale offices will also support the viability of the emerging town centre at Battersea Power Station.

Question 22

Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

4.114 The Putney Labour Party (Councillor Peter Carpenter) were of the view that office space is being minimised through the redevelopment process and that more emphasis should be placed on the provision of office space.

4.115 The BPLCL noted that the Battersea Power Station currently has planning permission to provide up to some 150,000m² of office floor space, of which approximately one third will be let to Apple. BPLCL acknowledged that this will provide a valuable boost to the viability of the area as a commercial office location, however noted that wider economic uncertainty

makes it difficult to predict exactly how much floor space will be required. On this basis, a suggestion was made to provide a degree of flexibility in policy to accommodate market demand, enabling additional office floorspace should it come forward.

4.116 Safestore Ltd also noted that the occupation of part of the Battersea Power Station could act as a catalyst for additional demand. Additionally Safestore Ltd expressed concern with regard to focusing so heavily of the provision of a particular type of floorspace in one location, noting that the regeneration of this area will displace existing occupiers who will be looking for alternative accommodation.

4.117 The GLA noted that a pipeline of office floorspace will make a valued contribution to office floorspace stock at borough level, as well as providing for the national and international role of office space in the CAZ.

4.118 Ms Justine Greening MP noted that there is an issue of office space being converted to residential uses and suggested that caution be exercised when considering the re-designation of industrial space for office use, as this land typically tends to be set back further from town centres and transport links and is, therefore, not necessarily attractive for office use.

Council Response

4.119 It is agreed that more emphasis should be placed in the Local Plan on the provision of office floorspace in the borough, both at Nine Elms and throughout the rest of Wandsworth. The ELPS has identified strong demand for increased office floorspace throughout the borough in addition to the large-scale offices at Nine Elms that will serve the central London office market.

4.120 It is agreed that a degree of flexibility will need to be shown on sites in Nine Elms and particularly at Battersea Power Station; given that this is an emerging area for which the precise market level of demand remains uncertain, it will be important for the Local Plan to allow a degree of additional office floorspace to come forward in this area in addition to that already granted permission. It is also appropriate to capitalise on any catalytic impacts for the surrounding areas and it is agreed that neighbouring sites, such as the Safestore and Havelock Terrace areas of the SIL, could see significant additional demand for business floorspace; this can be captured and controlled through a designation of these areas as suitable for Industrial Business Park uses.

4.121 It is agreed that much industrial floorspace in the borough is away from town centres and would not be the preferable location for office use, which should be directed toward town centres as set out in the NPPF.

Local and Sub-regional Offices

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⁾

4.122 The Putney Labour Party (Councillor Peter Carpenter) suggested that town centres should be expanded where there is a need for additional office space. Charterhouse Property Group agreed that suitable areas include edge-of-centre sites close to existing town centres, noting that areas to the north of Wandsworth Town Centre should be considered in particular. The Putney Labour Party (Councillor Peter Carpenter) also specifically noted that Crossrail 2 would provide significant opportunities for the expansion of office space, however acknowledged that given the expected timing of its delivery, reliance on it should not be factored into the plan.

4.123 Safestore Ltd suggested that their site at Ingate Place could be further intensified to provide office space given its proximity to Queenstown Road.

Council Response

4.124 It is agreed that edge of centre sites have the potential to add to the supply of office floorspace in the borough, particularly sites to the north of Wandsworth town centre. A review of the town centre boundaries is outside of the scope of this partial review but could be taken forward in the forthcoming full review of the Local Plan.

4.125 Crossrail 2 is likely to provide significant opportunities for additional office floorspace, particularly at Clapham Junction. However the timeline for this, the complications of site assembly and the need for significant multi-agency co-operation mean that it is uncertain that the bulk of this potential would be realised within the timeframe of the current Local Plan review.

4.126 It is agreed that the Ingate Place site may have the potential to provide additional business floorspace and that it should be designated as suitable for industrial Business Park uses. Following the London Plan, this area should retain a significant amount of industrial floorspace and would not be suitable for large-scale offices, however there are opportunities to build on the success of the existing business centre which provides industrial, storage and office floorspace for a wide variety of SME businesses.

1 Any sites already submitted as part of the Call for Sites undertaken between June and September 2016 will be taken into consideration as part of this site assessment exercise

Question 24

Are the areas listed above the most appropriate for new office development?

4.127 The GLA and TfL indicated that they are supportive of new office development where this is consistent with the London Plan Annex 2 and in areas of good public transport accessibility.

4.128 The Putney Labour Party (Councillor Peter Carpenter) considered that caution should be exercised in re-designating industrial sites as they are of the view that most will be required to meet forecast demand, however they consider that there may be scope for dual use in some instances where office space supports the industrial use. The Environment Agency stressed the need for redevelopment and intensification to be appropriately supported by environmental infrastructure for water resources and flood risk management.

Council Response

4.129 It is agreed that offices should be promoted in areas of good public transport accessibility. Given the increasing demand for office floorspace in the borough, and the recent significant loss of office floorspace in Putney and Wandsworth town centres in particular, it is considered appropriate to capitalise on this demand and promote these areas and edge-of-centre locations for new office development.

4.130 It is agreed that some ancillary office floorspace may be appropriate in industrial areas where this supports industrial businesses.

4.131 The need for environmental infrastructure for water resources and flood risk management is recognised. The updated Strategic Flood Risk Assessment and flood risk management adopted Local Plan Policies (Core Strategy Policy PL2 & DMPD Policies DMS5, 6 and 7) would be continue to be used to plan for flood risk management. It would be expected that a flood risk assessment for a development or new infrastructure would need to justify it's impact and demonstrate how it would deliver resilience to climate change. The existing flood management policies of the adopted Local Plan will be reviewed in the full review.

Question 25

Are there other areas or sites that the Local Plan should seek to designate for new office development?

4.132 The bus garage off Putney High Street was identified by the Putney Labour Party (Councillor Peter Carpenter) as being a site that could be developed into offices, with the garage being replaced with more intensive use of the Wandsworth bus garage site.

4.133 The GLA have indicated that they would not support this as the preference would be to maintain office development in the CAZ, town centres and accessible locations on the edges of town centres.

Council Response

4.134 The Putney bus garage is currently in use and plays an important role in providing transport infrastructure for the borough and neighbouring areas. Wandsworth bus garage is also used by a bus tour operator. Whilst intensification of these uses may enable more efficient use of the sites, it is not apparent that such a scheme would be successful. Given the on-going demand for transport infrastructure across London, it would be likely that any capacity freed up by intensification of these sites would still be required for transport uses.

4.135 It is agreed that offices should be focused in Town Centres, the CAZ and accessible locations. There will also be scope to provide some office floorspace in focal points, which already contain employment floorspace and through accommodating a wider mix of uses can create more attractive and vibrant places that capitalise on their riverfront locations.

Employment Intensification Areas

4.136 The consultation document asked:

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?

4.137 Respondents generally did not support the designation of both the former bingo hall site and Wandsworth gas holder site as EIAs (Workspace Group PLC, Safestore Ltd, Ipsus Developments Ltd, St William Homes and Scotia Gas Networks) and rather, sought that greater flexibility be provided for to enable an appropriate mix of uses, including employment and residential.

4.138 Workspace Group PLC are the owner of the former bingo hall site. They considered that provision for the intensification of employment to be appropriate on the site, however did not consider re-designation of the site to an EIA to be necessary. Rather, Workspace Group PLC were of the view that either the MUFIEA designation or status as an allocated site would be more appropriate for both the former bingo hall site and the Wandsworth gas holder site. They also noted that the MUFIEA designation would suit their current vision for the former bingo hall site, in that it encourages the incorporation of multiple uses, thereby providing for unified and coherent regeneration opportunities.

4.139 Safestore Ltd noted that the former bingo hall site has been vacant for a considerable period of time and suggested that policies requiring employment floorspace be lifted from the site in its entirety in order to ensure that the site can come forward for redevelopment. Ipsus Developments Ltd supported the prioritisation of the former bingo hall site for a mix of uses, including employment and residential. However, Ipsus Developments Ltd were of the view that it is inappropriate to consider the area solely in terms of increased floor space and rather, considered that a site-by-site approach would be more appropriate, taking into account the existing use of the site as well as the number of existing jobs and contribution to the economy.

4.140 St William Homes did not support designation of the Wandsworth gas holder site as an EIA and rather, considered that it should be either de-designated in its entirety or re-designated to a more flexible 'MUFIEA-type' allocation, which allows for residential-led mixed use development. They noted that there is sufficient evidence for the intensification of employment use on the site and conversely, considered that the evidence base directs that a mix of uses be provided for. St William Homes also referenced paragraph 173 of the National Planning Policy Framework (NPPF), noting that they consider the EIA designation would represent a policy burden threatening the ability of the site to be viably developed and therefore would fail to meet the relevant NPPF provisions. Further, St William Homes did not support the overarching directive to provide increased quantities of employment floorspace, noting that this approach does not take into consideration that different employment uses have differing densities and that the needs of businesses with respect to floorspace are continually changing.

4.141 Scotia Gas Networks objected to the designation of the Wandsworth gas holder site as an EIA, noting that this would fail to meet the policy tests for the redevelopment of gas holder sites as set out in the London Plan. Scotia Gas Networks also considered that the designation of the site as an EIA fails to take into account the actual land uses and contamination issues which currently exist on the site.

4.142 The Putney Labour Party (Councillor Peter Carpenter) considered the Wandsworth gas holder site to be particularly well located for employment intensification and support designation of the site to an EIA.

4.143 The Environment Agency noted the importance of addressing the impacts of past and future land uses, in order to ensure that these do not affect the health of people and the environment.

Council Response

4.144 Comments objecting to Employment Intensification Area designations, and promoting MUFIEA designations are noted. Areas should be considered on a site-by-site basis, looking at the established uses, the wider context and the location and connectivity of the area, amongst other issues. The MUFIEA designations in the adopted Local Plan reflect the location and the context of the sites and seek a wider mix of uses in order to support the objectives for the wider area. The areas being considered for employment intensification designations

lie outside of the nearest town and local centres and are not in a focal point or the CAZ, the areas of the borough where a wide mix of uses is most appropriate. Given the on-going demand for industrial and office uses, and the limited supply of sites that can meet this demand, it is important that sites that come forward in suitable locations make a significant contribution to economic floorspace specifically. The gas holder site, and the former bingo hall site, are large enough to have the potential to provide both residential uses alongside an increased amount of industrial and other business floorspace. Other than some small-scale premises to serve the needs of people living and working in the immediate area, these sites would not be suitable for large-scale town centre uses such as retail, which could act as a draw away from the town and local centres and harm their viability and vibrancy. The gas holder site is particularly well suited for intensified employment use, being located on the edge of Wandsworth town centre and within walking distance of Wandsworth Town station. In relation to employment densities, it should be noted that the forecast figures in the ELPS already take into account the likely increase in occupation densities for business premises and that, while offices invariably are occupied at higher densities than industrial uses, there remains strong demand for industrial premises in the borough which the Local Plan designations will need to take into account.

4.145 The requirement of policy 5.22d of the London Plan, which asks boroughs to ensure that land use allocations for hazardous installations take account of the need to incentivise and fund decommissioning, is noted. It is agreed that the decommissioning of the gas holder site should be encouraged, and it is considered that an allocation that allows both residential use and additional economic uses would achieve this. The site is not intensively used at present for business purposes, with much of the site being open storage, used temporarily in conjunction with the National Grid works, or being the gas holder itself and the surrounding infrastructure. For clarity, an allocation should specify that the gas holder should not be included in the quantity of floorspace that is required to be replaced, as this is not a core industrial use, does not currently contribute to industrial business floorspace and is surplus to requirements for utilities infrastructure.

4.146 It is agreed that any potential contaminants will need to be investigated and addressed as part of any applications that come forward for the gas holder site.

4.147 The consultation document asked:

Question 27

Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?

4.148 The Putney Labour Party (Councillor Peter Carpenter) considered that the areas surrounding the Wandsworth gas holder and former bingo hall sites are already well used and, therefore, would be unlikely to benefit from re-designation.

4.149 Ipsus Developments Ltd expressed support for the prioritisation of the wider Bendon Valley LSIA for a mix of uses, including employment and residential, to allow for the holistic redevelopment of the wider area. However, as noted above, Ipsus Developments Ltd did not consider it appropriate to consider the area solely in terms of increased floor space and rather, considered that a site-by-site approach would be more appropriate, taking into account the existing use of the site as well as the number of existing jobs and contribution to the economy.

4.150 Safestore Ltd were of the view that other sites should be considered which have an undersupply of floorspace in relation to demand, provide a less insensitive land use than could be provided, are well connected to public transport networks and close to core markets. They considered that sites should be evaluated on a site-by-site basis and tested against reasoned policies which facilitate intensification on each site. Additionally, Safestore Ltd considered that there is an opportunity to increase the quantum of employment floorspace at their Ingate Place site, noting that Council should seek to promote employment intensification at this site to maximise job creation potential. Safestore Ltd were of the view that their Ingate Place site should be reallocated from PIL to IBP, to ensure maximisation of the employment space offer within the site.

Council Response

4.151 It is agreed that sites should be considered individually, and it is considered that some nearby sites may be appropriate for re-designation as intensification areas, provided that they are able to both increase economic uses on the site and to provide residential uses without creating conflicts between the two.

4.152 For clarity, it is considered appropriate to designate the Safestore and Havelock Terrace parts of the SIL as IBP rather than as employment intensification areas; the other areas considered for intensification would be suitable for a mix of uses including residential use, however these parts of the SIL should remain free from any residential use in order to ensure that they retain a predominantly industrial character and do not result in conflicts between industrial operators and residential amenity. This is particularly important given the strategic role of the SIL.

4.153 The consultation document asked:

Question 28

Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?

4.154 The Putney Labour Party (Councillor Peter Carpenter) noted that the MUFIEA designation appears to be resulting in considerably more residential rather than office use on designated site. They considered that re-designation as an EIA would encourage office rather than residential development.

4.155 Both TR Property Investment Trust PLC and Workspace Group PLC considered the introduction of the EIA designation to be unnecessary and were of the view that it will over-complicate the existing industrial hierarchy. Alternatively, they suggested that the MUFIEA designation could be amended very slightly to accommodate the aims of the EIA designation instead. TR Property Investment Trust PLC and Workspace Group PLC considered that in their current form, MUFIEAs encourage rather than restrain new development, and appear to provide a fantastic opportunity to diversify employment uses on sites while simultaneously intensifying existing uses. They did note however, that the MUFIEA policy should be amended to give more prominence to the development of suitable business space for small and medium enterprises, as these businesses would benefit from the mix of uses provided for within MUFIEAs. Overall, both TR Property Investment Trust PLC and Workspace Group PLC were of the view that intensification should be sought more broadly across the SIL, LSIA, MUFIEA designated sites and undesignated sites, rather than isolating the aim solely within the new EIA designation. TR Property Investment Trust PLC further noted that the MUFIEA designation would suit their current vision for their Ferrier Street site, in that it encourages the incorporation of multiple uses, thereby providing for unified and coherent regeneration opportunities.

4.156 Safestore Ltd considered that while it may be suitable to locate EIAs in some of the existing MUFIEA locations, there should be a rationalised approach for the change, which has been assessed against the need for employment floorspace and the suitability of the location. Safestore noted that in this regard, re-designating MUFIEA in its entirety to EIA without the necessary background work would not meet the policy tests set out in the NPPF.

Council Response

4.157 The MUFIEA designation is considered to have been successful in encouraging a broader mix of uses that are appropriate for the strategic aims of the area they are located in, particularly the focal points and town centres. This has included the provision of modern business floorspace. However, re-designation of these as employment intensification areas could undermine this success; if the sites in MUFIEAs were all required to provide increased economic floorspace this may limit the opportunities to provide other non-residential uses that are important in the development of the relevant focal points and town centre sites. Some MUFIEAs are also not as accessible by public transport as the areas being considered for employment intensification, and would therefore not be as suitable for significantly increased quantities of business floorspace. Many MUFIEA sites have already been developed or at an advanced stage of planning, and significantly changing the MUFIEA policy could result in delays and viability implications for these sites. It is therefore appropriate to retain the same policy approach and site allocations for MUFIEA sites.

4.158 The consultation document asked:

Question 29

What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?

4.159 A number of developers considered that details such as quantum and/or specific mixtures of floor space are too prescriptive to be contained within a development plan policy (TR Property Investment Trust PLC, Workspace Group PLC and St William Homes). Both TR Property Investment Trust PLC and Workspace Group noted that each case will have different challenges and objectives, and considered that flexibility should be allowed so that each can come forward naturally in the future. They considered that it would be difficult to provide exact quantum for development which would apply to all sites and would remain relevant throughout the lifetime of the Local Plan, and on this basis, were of the view that quantum should be decided on a site-by-site basis. St William Homes were of the view that detail such as quantum is better placed in a SPD as guidance.

4.160 St William Homes also noted that in order to meet the policy tests set out in the NPPF and London Plan, and to align with the ELPS recommendation, a mix of floorspace and uses should be provided for and moreover, it will be imperative that housing provision be included in any policy going forward.

4.161 Safestore Ltd noted that the existing policy for MUFIEA provides for mixed use development with an element of residential development the re-provision of the same quantum of employment floorspace existing on the site. They considered that EIAs could provide for similar circumstances where it can be demonstrated on a site-by-site basis that the quantum of uses has been optimised.

4.162 The Putney Labour Party (Councillor Peter Carpenter) considered that there would be no advantage in the re-designation of areas in the case that housing provision was to be allowed.

4.163 Councillor Rosemary Torrington was of the view that a mixture of office and residential uses does not work well where office personnel have direct lines of site into private habitable rooms in residential use but considered that otherwise, the intensification of land use during the day and night works well.

Council Response

4.164 It is not agreed that specific requirements for the amount of floorspace to be provided is overly restrictive or would lead to sites not coming forward, so long as sites are considered individually and that the requirements are expressed in relation to the existing quantum of floorspace. This approach ensures that the expectation for sites are clearly set out, and that all sites are contributing to meeting the strategic aims of the Local Plan and the needs of the borough. Allowing broad flexibility, as suggested in some responses, could

result in sites cumulatively failing to provide the economic floorspace to meet demand in the borough, or increased pressure to allow economic floorspace on out-of-centre sites that are poorly connected.

4.165 It is agreed that developments should not result in undue overlooking and impacts on privacy between residents and people working in offices; the Local Plan policy should ensure that this is addressed in all relevant applications.

Area Spatial Strategies and Site Allocations

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 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.**

4.166 The Putney Labour Party (Councillor Peter Carpenter) and the Environment Agency considered all of the issues set out above to be relevant.

4.167 Ms Justine Greening MP agreed that the Area Spatial Strategy should include aspects such as pedestrian and cycle access; mix, use and layout of developments; and historical analysis of character, however considered that environmental issues such as enhancement of the River Wandle would potentially be better managed in a separate document covering environmental issues.

4.168 The Environment Agency also noted that regeneration and re-development of some areas offers an opportunity to reduce flood risk; for example through the layout and design of new development. They considered that when spatial strategies and site allocations include an area of watercourse such as the River Wandle, they should always include enhancement/restoration of the river for wildlife, creation of space/buffer habitat to the river and a general increase in biodiversity through the creation of public spaces, particularly along the riverside areas. The Environment Agency also considered that there should be an aim

for public access that creates positive engagement with the river, but where possible includes some inaccessible/quiet areas to assist in creating pockets of undisturbed habitat for breeding birds and mammals in particular.

4.169 Councillor Rosemary Torrington considered that investment in public transport in the Wandle Delta is important if employment use is intensified, noting that the Wandsworth Town Station has been operating beyond capacity.

4.170 St William Homes considered that further detail such as quantum should be set out in a SPD as guidance rather than being contained within a development plan policy.

4.171 Scotia Gas Networks were of the view that the above question pertains to a procedural issue rather than a spatial issue, and would be more appropriate in the case that the Council should wish to vary their site specific allocations documents. Scotia Gas Networks also sought clarification on the purpose of area spatial strategies as they understood the purpose was to promote a mixed use approach to re-development, rather than setting out an industrial spatial strategy.

Council Response

4.172 It is appropriate for the area spatial strategies for areas of change to look at a wide variety of spatial characteristics and opportunities for improvements to the area, and to consider how this can be achieved across multiple sites in different ownerships and with differing development timescales. It is agreed that a key issue for the Wandle Delta area will be biodiversity enhancements and that the implications for public transport capacity will need to be addressed.

Question 31

Are there any additional issues that should be addressed through the Area Spatial Strategy and site allocations?

4.173 Respondents suggested a number of additional issues be considered, including both the density of development and height and spacing of buildings (Putney Labour Party (Councillor Peter Carpenter)), climate change allowances, surface water drainage and waste management (Environment Agency), and development compatibility within proximity to major hazard establishments and major accident hazard pipelines (Health & Safety Executive).

Council Response

4.174 The issues raised are all relevant to the development of sites and should be addressed either through an area spatial strategy or through information provided and considered at application stage.

Question 32

Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?

4.175 The Environment Agency considered that all allocations with a riverside component should ideally include a detailed site allocation to assist in guiding redevelopment, while ensuring that restoration takes place and sufficient land is allocated as biodiversity habitat and public open space.

4.176 Panorama Antennas noted that they consider their site to be appropriate for additional/intensified industrial or other employment use with the potential for a small amount of non-employment use. They suggested site allocation wording for both 61-63 Frogmore and 10 Dormay Street to allow for the redevelopment of this land for employment-led uses, while also providing flexibility to incorporate an element of supporting non-employment uses.

Council Response

4.177 It is agreed that site allocations should address the need for improved access to and biodiversity of the Wandle and the provision of public space in the area.

4.178 It is agreed that the Panorama Antennas site has the potential to provide intensified industrial use as well as a small amount of residential use. This can be taken forward as a site allocation and by designating the site as an economic use intensification area.

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?

4.179 The Western Riverside Waste Authority questioned the appropriateness of locating a public open space on Feathers Wharf, immediately adjacent to a waste transfer station and safeguarded wharf. On this basis, they considered that the proposed routes and spaces set out in the adopted Area Spatial Strategy do not give the optimal arrangement for the area, and suggest that alternative approaches be explored.

4.180 The Putney Labour Party (Councillor Peter Carpenter) commented that the Wandle Delta Strategy fails to provide a continuous Thameside path, and should be amended to do so.

4.181 St William Homes considered that further detail such as design should not be contained in a development plan policy and rather, should be set out in a SPD as guidance.

Council Response

4.182 It is not agreed that Feathers Wharf is an inappropriate site for an area of public open space. This site forms one half of a pair of sites either side of the mouth of the Wandle, which together offer unique opportunities for the enjoyment of the natural character of the area. There are limited places in inner London where the confluence of the a tributary with the river Thames can be appreciated, and an area of public space is appropriate on Feathers Wharf to allow for this. The site is also significant in being part of the Wandle trail and an area of open space on the site would align with the objectives for the Wandle Valley Regional Park.

4.183 It is agreed that the area should contribute to a continuous Thames Path and that this should be reflected in the area spatial strategy and site allocations.

4.184 It is not agreed that design details are inappropriate for an area spatial strategy; excluding and delaying this information until an SPD would fail to provide clarity to developers and would result in piecemeal development of the area that fails to optimise the potential for spatial and environmental improvements.

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?

4.185 All respondents (Putney Labour Party (Councillor Peter Carpenter), Ipsus Developments Ltd, Safestore Ltd and Workspace Group PLC) expressed support for the adoption of a spatial strategy and/or site allocation for the former bingo hall site. However, Ipsus Developments Ltd considered that any area spatial strategy and/or site allocation should also include the whole of the Bendon Valley LSIA to allow a holistic approach to the redevelopment and improvement of the area. Workspace Group PLC referred the Council to the masterplan prepared for the former bingo hall site to use as guidance, noting that it sets out the existing site constraints and opportunities.

Council Response

4.186 Given that the former bingo hall and the Riverside Business Park form one contiguous block in a single ownership, and that it is not envisaged that there will be significant spatial and land use changes in the wider area, it is considered appropriate to put in place a site allocation for the site but not to set out an area spatial strategy.

4.5 E15 - New employment development

Development Requirements

4.187 The consultation document asked:

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?

4.188 TR Property Investment Trust PLC and Workspace Group PLC considered that the Local Plan could continue to outline high level design requirements expected from developments, however they noted that rent level, leasing and management may fall outside of the planning requirement. Both respondents also noted that these requirements should avoid being overly prescriptive by allowing for flexibility in order to attract and accommodate a wide range of employment opportunities. Further, Safestore Ltd noted that policies which specify requirements relating to rent levels, leasing and management of new employment premises may prejudice development, given the lack of ability for these policies to be applied flexibly and reflect market conditions. St William Homes were of the view that further detail such as design should be set out in a SPD as guidance and should not be contained within a development plan policy.

4.189 Scotia Gas Networks considered that caution should be exercised so as not to create a web of overly restrictive development plan policy that stymies development. They objected to the approach to regularise commercial design, affordability, creative and flexible workspaces, cultural industries and managed workspace design through the development plan as they considered that the current approach lacks definition and clarity.

4.190 The GLA indicated that they welcome approaches which set criteria for the design, leasing and management of new employment premises to support small and medium enterprises.

4.191 Ms Justine Greening MP expressed support for the specification of requirements relating to design to ensure that high quality development is secured and also noted that prescribing rent requirements will mean that developers cannot 'price-out' local businesses in favour of larger corporations. Ms Greening suggested that the Council consider whether parking can be considered as part of the management of new employment floorspace, noting that this is an issue that has arisen in relation to new developments in Putney; however, she was of the view that broadly, the use of public transport should be encouraged.

4.192 The Putney Labour Party (Councillor Peter Carpenter) considered that the Local Plan should provide some guidance about what is meant by 'realistic rents'.

4.193 Councillor Rosemary Torrington was of the view that the recommended ceiling heights for offices are very high compared to residential ceiling heights, resulting in much taller buildings than necessary. Council Rosemary Torrington recommended considering a reduction in the recommended ceiling heights. She also noted that it is not appropriate for office windows of over 3 metres in height to be oriented such that views are provided directly into bedroom windows opposite.

Council Response

4.194 Given the significant increases in rent levels for businesses in the borough in recent years, and the affordability implications for many businesses - especially the SME firms that make up the majority of the borough's business base - it is considered appropriate to continue the adopted Local Plan approach of seeking realistic rents for new developments. With the growth of various managed workspace models and the additional flexibility and affordability that such models can provide to businesses, it is considered relevant to seek managed workspace as part of larger developments that include economic floorspace.

4.195 It is appropriate to set out specific requirements for the design of new developments that include economic floorspace. This will ensure that developers are given clarity on the form of development that would secure permission and that new employment floorspace is fit for purpose and meets the needs of the wide variety of businesses that operate from the borough or may seek to locate here.

4.196 The consultation document asked:

Large-scale Mixed Use Development

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?

4.197 The GLA expressed support for the above approach.

4.198 TR Property Investment Trust PLC and Workspace Group PLC noted that the consideration of employment and residential uses complementing each other is already a key test within any mixed use planning application. Both respondents further noted that the relationship between residential and employment use needs to ensure that they work in harmony both physically and operationally.

4.199 Safestore Ltd were of the view that proposals to increase the design and management restrictions of development should be resisted and rather, considered that there should be flexibility within planning policy for sites to be brought forward for development where a proposal can demonstrate complementary uses and good design. They noted that local plans should not be onerous or place restrictive requirements which could stifle investment or regeneration opportunities. Specifically, Safestore considered that in order to accord with the NPPF, plans should be deliverable and, therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

4.200 Ms Justine Greening expressed agreement with a more flexible approach and suggested that a case-by-case approach is required, where developers could be allowed to put forward a case of further units for B1 use where there is a clear demand, while still ensuring a minimum level of C3 units per build. Ms Justine Greening noted that the Local Plan should require the design of a development to demonstrate cohesion between the retail and business use floors, while also ensuring appropriate segregation so that disruption to residents during business hours is minimal. Ms Justine Greening was of the view that major regeneration initiatives should be encouraged to include provision of employment floorspace, as employment opportunities and thriving business are an integral part of what makes regeneration successful in supporting the local offer. Again, she expressed support for a demand-based approach to assessing such proposals.

4.201 Both Councillor Rosemary Torrington and the Battersea Society raised concerns in regard to the compatibility of uses. Councillor Rosemary Torrington considered that care needs to be taken when installing servicing areas, noting that these are not compatible with residential uses. The Battersea Society emphasised that care is required to ensure that potential nuisance from business use is appropriately recognised in the physical design of buildings.

4.202 TfL expressed support for the promotion of mixed use schemes in areas of excellent public transport accessibility, where these are viable and practicable. They noted that the consideration of employment uses on upper floors should not be ruled out where desirable and that co-location should not be limited to office and residential use, but should also incorporate industrial use as appropriate. TfL also indicated that they would like to work with the Council to frame design principles that developers can adopt in this regard.

4.203 The Putney Labour Party (Councillor Peter Carpenter) noted that there has been pressure to convert ground floor employment uses to residential on some sites. They suggested that segregating office and residential use into separate buildings could assist in the mitigating this potential loss of employment potential.

4.204 The Environment Agency noted that they have developed a guide for developers which provides advice on ensuring development contributes to long-term environmental quality and practical advice on a range of environmental issues that may affect a site.

Council Response

4.205 It is agreed that Local Plan policies should not be overly restrictive, however it is also important to ensure that where mixed use sites are developed they should be designed in a way that the uses complement, rather than compete with, each other. This is particularly important given the high density and intensity of uses that are likely to come forward on some large mixed-use sites, and that some sites will include industrial uses as well as residential use, which traditionally have been developed in physically separate areas.

4.6 EI6 - Affordable, creative and flexible workplaces

Regeneration Areas

4.206 The consultation document asked:

Question 37

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

4.207 As a general principle, the GLA expressed support for the provision of employment floorspace in regeneration initiatives. The Putney Labour Party (Councillor Peter Carpenter) agreed that the Local Plan should require major regeneration initiatives to include provision of employment floor space, noting that particular attention should be paid to providing incubator space for new and growing companies.

4.208 Conversely, the BPLCL were of the view that employment floorspace needs to be considered on a site-by-site basis. BPLCL noted that not all major sites will be suitable for employment uses and that employment needs to be considered across the Borough to ensure that there is a strategic approach which works with the market. They considered that policy should generally focus on allowing and encouraging the provision of employment floorspace where there is demand, and provide the framework to support and encourage the networks and environment that will assist in making new employment developments successful.

4.209 The Battersea Society raised concerns with regard to a specific regeneration project, noting their support for the inclusion of employment floorspace within the regeneration scheme itself or integration with existing nearby employment uses.

Council Response

4.210 It should be clarified that this question relates primarily to the regeneration of areas that have high instances of deprivation and low levels of access to local jobs, particularly parts of Tooting, Roehampton and Battersea. In Roehampton and Battersea in particular

there are significant plans to redevelop large housing estates, and as part of this it is appropriate to encourage small-scale employment floorspace in order to support start-up businesses and local entrepreneurs.

4.211 The consultation document asked:

Question 38

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

4.212 The Putney Labour Party (Councillor Peter Carpenter) expressed support for both retail and office space, as well as incubator space for new and growing companies. They considered that units should be large enough to generate a viable employment environment and have suggested an approximate floor area of 1000m².

4.213 The GLA expressed support for types and sizes that are viable and which complement other uses, such as residential.

Council Response

4.214 Given that the regeneration areas are generally located away from Town Centres, and that new employment floorspace will serve a relatively local catchment area, it is considered appropriate that only small-scale provision of new employment floorspace should be encouraged. This floorspace should be aimed at local start-up and SME businesses.

Creative and Cultural Industries

4.215 The consultation document asked:

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?

4.216 A number of respondents generally agreed that the Local Plan should specifically seek creative workspace as part of large-scale employment developments and expressed support for the inclusion of requirements within the Local Plan to ensure that affordable creative workspace is provided as part of this (Councillor Rosemary Torrington, the Putney Labour Party (Councillor Peter Carpenter), The Theatres Trust, Battersea Arts Centre, the Battersea Society and the Greater London Authority).

4.217 The GLA noted that this approach is consistent with the Mayor's new vision for London and considered that the Local Plan should seek creative workspace in large scale employment developments where this is viable. The Battersea Society were of the view that a primary objective should be to provide creative workspace suited to local residents, including those already in professional and creative industries and those seeking to set up in these sectors.

4.218 The Battersea Arts Centre and Chocolate Films Ltd stressed that it is relevant to consider the different types of spaces that are preferred by different parts of the creative industries sector. The Battersea Arts Centre also stressed the importance of developers having conversations with local delivery partners to explore the best way to deliver benefit in the local area, noting that this may include the provision of affordable workspace but could also include other more appropriate delivery mechanisms depending on the nature and location of the development (e.g. Training, business development or activity programmes). To this end, the Battersea Arts Centre raised the potential for local cultural organisations to be used as place-making agencies, to ensure that developments are fit for purpose. Chocolate Films Ltd also noted the benefits of being part of a wider eco-system of businesses as a creative business; specifically, some creative business help creativity and enable a support network for creatives, while proximity to non-related businesses can be advantageous in that there is potential for them to be consumers of creative services.

4.219 The Putney Labour Party (Councillor Peter Carpenter) suggested that 10% could be an appropriate allocation, on the basis that 5.7% of the workforce are currently employed in creative industries and the use is relatively space-intensive. Both the Putney Labour Party (Councillor Peter Carpenter) and The Theatres Trust suggested that Section 106 agreements could be an appropriate mechanism to secure affordable, creative employment space. The Theatres Trust recommended specific policy wording which seeks to protect existing and promote the provision of new and additional affordable creative work spaces.

4.220 BPLCL considered that the most effective role of planning policy is to create the framework to allow voluntary provision of creative, affordable and managed workspace (refer questions 41 and 45), by avoiding prescriptive or burdensome requirements that make other commercial uses more attractive, by protecting suitable areas or buildings from other uses and by guiding providers of this floorspace to appropriate sites. They suggested that this could include other incentives, such as removing the requirement for such floorspace to pay the Community Infrastructure Levy (CIL), or allowing developers to trade such floorspace with other planning benefits.

4.221 Schrodgers recognised the need to promote affordable creative workspaces in the Local Plan, however considered that this should be based on the viability of individual schemes and the demand for accommodation in a particular area. Schrodgers considered that opportunities to promote creative workspace should be focused at locations which will support clusters that thrive off proximity to others in the same sector, noting that it may not be appropriate to promote creative workspace in every large scale employment development.

4.222 The Association for Cultural Advancement through Visual Art (ACAVA) expressed concern about the inaffordability of floorspace in London and the consequential risk to the economy and wellbeing of the city if artists continue to leave London as a result. ACAVA were of the view that studio providers require more robust support from local authorities if their efforts to retain and build creative communities, and the creative industries they generate, are to continue to be successful.

4.223 The Arts Council England noted that they welcome the inclusion of culture within local plans as they consider that the contribution that creative industries make to the economy overall can be restricted if there is a lack of workspace and studios. The Arts Council England also noted that the planning system can support the value of arts and culture to social wellbeing by considering the spatial nature of engagement with cultural opportunity. Overall, the Arts Council England would encourage local planning authorities to consider these issues as part of the development of local plans and within the context of the NPPF.

4.224 Enable Arts expressed support for the protection and provision of space and facilities for the cultural and creative sector via the Local Plan, including affordable workspace. More specifically, they expressed support for the creation of policy more specifically focused on the needs of the sector. Enable Arts raised concerns that the quoted figures for creative workers in the Borough may be below real figures, as many creatives are freelance and work from home, possibly as a result of the rising cost and diminishing availability of creative workspace. In addition to affordability, Enable Arts noted the need for creative workspace to be functional and fit-for-purpose, emphasising that cultural industries operate beyond workspace considerations within a wider ecology of surrounding facilities and space. Enable Arts were of the view that policy needs to be put in place to support and encourage the development of cultural industries, ensuring costs are worked into development viability at the outset.

4.225 The Creative Industries Federation expressed support for the priorities set out in the London Plan urging local development frameworks to enhance and protect creative work and performance spaces, support the temporary use of vacant buildings for performance and creative work, designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration, provide arts and cultural facilities in major mixed use developments and seek to enhance the economic contribution and community role of arts. They noted that as part of their submission to the GLA enquiry into culture-led regeneration, a key recommendation was that affordable workspaces be classified as 'infrastructure essential to the creative economy', thereby allowing CIL money to be accessed in order to support their development and maintenance.

Council Response

4.226 It is agreed that workspace that is suitable for the cultural and creative sector should be sought through the Local Plan review. This can be achieved through requirements on specific site allocations and through encouraging the provision of a broad range of cultural workspace in appropriate locations. Securing affordable workspace for the creative sector will also be important, and this overlaps with the need for affordable workspace more

generally. It is recognised, however, that cultural organisations and individuals are particularly vulnerable to high rents given that this is often a low income sector. It is agreed that demand for cultural workspace may be greater than the projections in the ELPS.

4.227 The consultation document asked:

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?

4.228 The majority of respondents (Putney Labour Party (Councillor Peter Carpenter), the Battersea Society, The Theatres Trust, and the Greater London Authority) agreed that the Local Plan should seek to provide new cultural spaces as part of large-scale redevelopments. Section 106 agreements and/or the CIL were suggested by some respondents (The Theatres Trust, Putney Labour Party (Councillor Peter Carpenter) and the Battersea Society) as mechanisms to secure provision of these spaces. The Putney Labour Party (Councillor Peter Carpenter) suggested that it may be possible to encourage the return of a number of former cultural assets via restrictions on the type of development allowed on specific sites.

4.229 The Theatres Trust, BPLCL and the Battersea Arts Centre all generally reinforced the need to create functional, fit-for-purpose spaces that meet an actual demand.

4.230 The Theatres Trust recommended the model used by the London Borough of Southwark, who are understood to maintain a database of creative groups looking for creative spaces and involve the appropriate parties with developers at pre-application stage.

4.231 BPLCL cautioned against an overly prescriptive approach to locating cultural uses, which attempts to artificially create or direct cultural spaces where they may not be appropriate and moreover, expressed support for a wider strategic approach rather than consideration on a site-by-site basis. They also noted that there are existing cultural spaces in need of revenue support, and therefore, were of the view that the provision of new spaces should be considered in the context of the existing cultural landscape in an area. BPLCL considered that in light of the low development value of cultural uses, there should be recognition that other obligations such as affordable housing, may need to be reduced to offset the cost of delivery.

Council Response

4.232 Given that the review is primarily focussed on employment and industry issues, it is not considered appropriate to specifically seek new cultural spaces on the sites set out in the employment and industry local plan document. New cultural spaces will continue to be sought and encouraged in line with adopted Local Plan policy, with a preference for these in accessible and town centre locations and as part of established and emerging night time economies. There may be scope for some of the cultural workspace sought through the Local Plan review to provide space for the development of cultural events, activities, productions or performance, should demand for such spaces become apparent.

Affordability

4.233 The consultation document asked:

Question 41

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

4.234 There were mixed responses to the above question.

4.235 Councillor Rosemary Torrington, the Putney Labour Party (Councillor Peter Carpenter), the Battersea Society and the GLA explicitly agreed that the Local Plan should seek to ensure the provision of affordable workspace for business in the Borough, while Workspace Group PLC and TR Property Investment Trust PLC disagreed as they do not consider a prescriptive approach for addressing affordable workspace to be appropriate.

4.236 The Battersea Arts Centre noted that where affordable workspace is available, there is little provision for incubator, accelerator and co-working spaces.

4.237 Ms Justine Greening MP expressed support, in principle, for provision for affordable workspace via the Local Plan. Ms Justine Greening MP noted however that it does not necessarily follow that this provision should be a requirement in specific areas, although she considered that there is potentially rationale for an allocation in regeneration areas. Ms Justine Greening MP suggested that a potential way to ensure a suitable amount of affordable workspace is to require a certain number of units as a proportion, based on the specific needs of an area. Additionally, Ms Justine Greening MP noted that where redundancy of employment space has been demonstrated, some space should be retained for business use where it adds to the economic viability of the surrounding area and otherwise, there should be some degree of flexibility for conversion to residential use where this would be more appropriate contextually.

Council Response

4.238 Given the significant increases in rents for economic uses in recent years, and the affordability barriers that many businesses face, it is considered appropriate to seek to provide affordable workspace in the borough. The growth of the managed workspace sector has demonstrated that there is strong demand for business floorspace that includes flexibility and affordability characteristics, and that provides a level of business development, support or other services alongside the floorspace itself. To provide more affordable workspace, and encourage investment in modern business premises, the Local Plan should encourage and require managed workspace that includes affordability - and other - characteristics, particularly on larger sites.

4.239 The consultation document asked:

Question 42

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

4.240 The Putney Labour Party (Councillor Peter Carpenter) considered that town centre space should continue to be reserved for local business, however they noted that to ensure affordability, this may be on the secondary fringes. The Putney Labour Party (Councillor Peter Carpenter) also stressed that the continued availability of smaller unit sizes suitable for local businesses should be secured.

4.241 The Battersea Arts Centre were of the view that this should be considered on all development where a creative, daytime economy, is or can be supported. They noted that this would be particularly important in areas where there is already the infrastructure and local economy that would benefit from an increase in small, creative businesses with the adequate supporting transport links.

4.242 Big Yellow Self Storage Company Ltd sought that the Local Plan be amended as part of the current review to explicitly clarify that warehouse and distribution uses (Use Class B8) are not subject to a requirement to provide affordable workspace, given the supporting role that B8 uses already provide for small and medium enterprises and the flexible manner in which this storage space is let.

Council Response

4.243 It is considered appropriate to seek affordable workspace on all large-scale developments that include a substantial amount of economic floorspace. The comments of the Big Yellow Self Storage Company Ltd are noted, however it is considered appropriate to require B8 uses to also provide an element of affordable workspace; the local plan policy will need to be flexible enough to ensure that such uses can meet the criteria, however given

that storage facilities such as those provided by the Big Yellow Self Storage Company Ltd tend to include a significant amount of flexibility, units of varying cost and sizes, and other features that contribute to affordability this should be achievable.

4.244 The consultation document asked:

Question 43

How should affordable workspace be secured – for example through s106 agreements?

4.245 The Putney Labour Party (Councillor Peter Carpenter) and GLA were of the view that Section 106 agreements are one mechanism for securing affordable workspace in new developments. The Putney Labour Party (Councillor Peter Carpenter) also suggested that continued use could be secured through the designation process in existing developments, while the GLA suggested direct provision on Council-owned land.

4.246 Workspace Group PLC and TR Property Investment Trust PLC did not agree that affordable workspace should be addressed in a prescriptive manner.

Council Response

4.247 It is considered that a flexible approach to securing affordable workspace should be pursued. The provision of managed workspace that includes a range of affordability characteristics should be required; this reflects a growing sector of in the workspace market for which there is clear demand and will encourage investment in modern, flexible premises that meet the needs of a wide variety of businesses including the SME firms that make up the significant majority of businesses in the borough. As an alternative, it is considered appropriate to secure a fixed quantity of workspace at a specified affordable rate through a s106 agreement.

4.248 The consultation document asked:

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?

4.249 The Putney Labour Party (Councillor Peter Carpenter) noted that managed workspace is not always affordable because management charges can be high. On this basis, they suggested securing affordability by setting a maximum percentage of market rate as is the case with 'affordable homes'.

4.250 The Big Yellow Self Storage Company Ltd suggested that in the case that affordable workspace becomes a requirement of business developments in the Borough, the Local Plan be amended to clarify that affordable workspace can be affordable either by virtue of its design and/or the manner in which it is let. Specifically, the Big Yellow Self Storage Company Ltd sought that affordable workspace not be a requirement for warehouse and distribution use.

4.251 Safestore Ltd noted that there are a number of ways of assessing affordability and moreover, considered that headline rent reduction is arbitrary and does not reflect what businesses can actually afford. On this basis, they were of the view that managed workspace is one potential method of providing affordable workspace but not the only method.

4.252 Schroders expressed support for the development of managed workspace and co-working premises which support a range of small and medium enterprise users. However, they were of the view that managed workspace should be delivered in locations where there is an identified need for this type of floorspace and demand from start-up businesses and small and medium enterprises, rather than within all new developments. Schroders recommended that the Council commission a managed workspace study to form part of the Local Plan evidence base.

Council Response

4.253 It is agreed that managed workspace is not necessarily affordable in all instances and that some managed workspace providers charge rates that are significantly higher than average rental rates for traditional employment premises. It is therefore considered appropriate to set out and require a range of affordability criteria in Local Plan policy to ensure that managed workspace does provide workspace that meets the needs of businesses, particularly SME firms.

Managed Workspaces

4.254 The consultation document asked:

Question 45

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

4.255 Respondents (Putney Labour Party (Councillor Peter Carpenter), Schrodgers and the Battersea Society) generally agreed that the Local Plan should require managed workspace to be provided as part of new developments where appropriate.

Council Response

4.256 It is agreed that managed workspace should be provided on new developments, particularly larger scale schemes that include a significant amount of employment floorspace.

4.257 The consultation document asked:

Question 46

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

4.258 The Putney Labour Party (Councillor Peter Carpenter) expressed support for a requirement for managed workspace on larger new developments which can support a viable level of managed workspace, noting that this type of floorspace is probably better located at edge of town centre locations.

4.259 The Battersea Society agreed that managed workspace should be required within major regeneration schemes and mixed use developments.

4.260 Schrodgers considered that managed workspace should be delivered in locations where there is an identified need and demand rather than in all new developments.

Council Response

4.261 It is agreed that larger developments have the capacity to provide managed workspace, and that edge-of-centre and other accessible locations would be most suitable for such schemes.

4.262 The consultation document asked:

Question 47

How should managed workspace be secured – for example through s106 agreements?

4.263 The Putney Labour Party (Councillor Peter Carpenter) were of the view that managed workspace should be specified as a percentage of employment space mix and suggested a component of approximately 10% on specific sites. They suggested that the continued use of this workspace as such could be secured through the use of Section 106 agreements.

Council Response

4.264 It is agreed that a minimum of 10% of economic floorspace is an appropriate amount to seek for managed workspace, and that it may be appropriate to secure this through s106 agreements. Given that most workspace providers seek at least 400 sq ms of floorspace - and some seek significantly more than this as a minimum - it is appropriate to also set this as a minimum limit.

4.7 EI7 - Managing land for industry, distribution and waste

Queenstown Road SIL

4.265 The consultation document asked:

Question 48

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

4.266 All respondents supported the re-designation of the Havelock Terrace area as an Industrial Business Park in principle.

4.267 TfL had no objection to the re-designation of sites within the Havelock Terrace area to Industrial Business Park, however noted that detailed transport assessments will be required either with individual planning applications or at an area wide scale to consider the changes of use.

Council Response

4.268 It is agreed that the Havelock Terrace area should be re-designated as suitable for Industrial Business Park uses. Transport assessments will also be required as applications come forward.

4.269 The consultation document asked:

Question 49

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

4.270 The Putney Labour Party (Councillor Peter Carpenter) supported the re-designation of the Havelock Terrace area however considered that in the alternative, the area could retain its existing designation.

4.271 Workspace Group PLC considered that their site should be granted a more flexible designation such as MUFIEA or EIA in order to facilitate the successful regeneration of the plot. They were of the view that this would cause no detriment to the overall integrity of the Queenstown Road SIL, given that their site is located on the periphery of the designation and is physically isolated from the majority of the SIL by a series of railway lines.

Council Response

4.272 It is considered that the IBP designation is the most suitable for the Havelock Terrace area. Other designations, such as MUFIEA or EIA, would allow residential uses into the area which could significantly erode the industrial character of the area and result in loss of strategic industrial land. Whilst the Workspace Group PLC site is located on the edge of this area, it is still appropriate to retain it within the SIL and not allow incremental encroachment of residential uses into the area.

4.273 The consultation document asked:

Question 50

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

4.274 The Putney Labour Party (Councillor Peter Carpenter) expressed support for the extension of the Industrial Business Park designation to other parts of the SIL as appropriate, while the GLA recommended that other parts of the SIL remain as Preferred Industrial Locations in line with Annex 3 of the London Plan.

4.275 Safestore Ltd suggested that the re-designation should not be limited to Havelock Terrace and rather, should also include the Safestore site at Ingate Place. They noted that in the event both the west of Ingate Place and Havelock Terrace are to be re-designated to Industrial Business Park, then it would be an inconsistent application of policy for the Ingate Place Safestore site, which lies between the two, to remain a PIL designation.

4.276 Schrodgers sought the extension of the Industrial Business Park designation to include the Ingate Place and Havelock Terrace areas, to create a more regular shaped zone which will form an effective buffer extending the length of the SIL boundary.

Council Response

4.277 It is considered appropriate to also include the Safestore site at Ingate Place within the IBP designation. This will both more accurately reflect the mix of business uses within this area and encourage investment in new industrial and other business floorspace. Given

the industrial and transport uses that surround the site promoted by Schroders, it is not considered appropriate to extend the IBP boundaries around the western edge of the SIL as this could result in the erosion of the industrial and transport use of these sites which play a significant role in meeting the borough's need for sites suitable for heavier industry and transport functions.

4.278 The consultation document asked:

Question 51

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

4.279 The Putney Labour Party (Councillor Peter Carpenter), the Battersea Society and the GLA opposed the inclusion of residential use within the SIL. Specifically, the Putney Labour Party (Councillor Peter Carpenter) considered that mixing residential and industrial uses should be avoided because of the friction caused between the two types of users, while the GLA were of the view that allowing residential use within the SIL would be contrary to policy 2.17 of the London Plan. The Battersea Society noted that the mix of uses could generate a poor quality environment for residential development while also resulting in loss of employment potential.

4.280 Conversely, a number of developers generally supported the inclusion of residential use within the SIL where appropriate.

4.281 To this end, Workspace Group PLC noted that the London Plan requires Industrial Business Parks to have quality surroundings and, accordingly, many of the uses do not conflict with residential uses to the same extent that heavy industrial use would. Workspace Group PLC sought that the Local Plan recognise that renewal/regeneration of older business centres is only likely to be viable if the provision of mixed use on existing sites is supported, allowing higher value uses to act as enablers.

4.282 Safestore Ltd also considered that there should be flexibility within the Local Plan to enable the development of residential uses within an SIL where it can be demonstrated that the introduction of such use would not compromise the long-term success of the industrial area. They suggested that the criteria set out in the existing MUFIEA policy (Policy PL6) could be applied to assess the appropriateness of residential use within SIL locations on a site-by-site basis.

4.283 Schroders were of the view that the SIL designation should take into account the changing demands and styles of employment uses, and accordingly, the complementary uses that can work alongside these. They considered that it would be inappropriate to promote residential use throughout the SIL, however are of the view that the Industrial Business Park, acting as a transition and buffer zone for the SIL, is a good example of where a more flexible approach to innovative mixed use development and residential uses should be considered.

Council Response

4.284 There remains strong demand for industrial uses in the borough, and the borough is identified in the London Plan as a restricted transfer borough for protected industrial land. The SIL is also identified in the London Plan as being of strategic importance to London as a whole. Allowing residential uses in any part of the SIL would result in the piecemeal loss of industrial sites and compromise the flexibility of remaining sites to provide land for a broad range of industrial, transport, waste and other crucial uses.

4.285 The consultation document asked:

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?

4.286 The GLA expressed support for opportunities for intensifying industrial activities in line with policy 2.17 of the London Plan.

4.287 The Putney Labour Party (Councillor Peter Carpenter) suggested that the re-designation of part of the Stewarts Road area as Industrial Business Park could facilitate redevelopment which has yet to come to fruition.

4.288 Workspace Group PLC considered that if sufficient industrial land can be provided/protected within and around London then the continued release of industrial land in London may be possible. They noted that their business model has proven to be successful in the regeneration of rundown industrial buildings and their replacement with flexible light industrial workspace for predominantly small and medium sized enterprises, usually classified as B1 uses. This results in the intensification of employment use on site, however, Workspace Group PLC were of the view that the regeneration of older sites is only likely to be viable if the provision of supported mixed-use is enabled, allowing higher value uses (e.g. residential and/or retail) to act as enablers. Workspace Group PLC also noted that the nature of such redevelopment would have positive effect on the overall quality of the site and the public realm.

4.289 The Battersea Society and Safestore Ltd generally supported greater intensification of uses where appropriate. The Battersea Society noted that intensification of use should not cause major knock-on effects in terms of significant increases in heavy traffic, deterioration in air quality and noise pollution, and should offer greater opportunities for small local service companies. Safestore Ltd supported the intensification of non-efficient employment sites, noting that a possible strategy for improvement of the public realm in and around the SIL could be to release an element of PIL locations to Industrial Business Park. Safestore Ltd

noted that releasing more land for Industrial Business Park would continue to ensure job creation and could incentivise investment in more light industrial or office uses which in turn could generate infrastructure contributions to help improve the environment of that area. They were also of the view that if landowners/developers can be incentivised by the increased value of their sites, there would be an opportunity for each individual redevelopment to contribute to public realm improvements.

4.290 Schrodgers noted that they have been exploring ways of delivering high quality co-working floorspace on the Battersea Studios site, which to their minds, could increase the density and intensity of employment uses in the SIL, while also delivering complementary co-living 'build to rent' development. Schrodgers noted that this development model would create additional workplace by increasing density, would provide other uses and would create permanent neighbourhoods where people can live and work. They were of the opinion that this type of use would further develop and expand the creative small and medium enterprise cluster that is forming at Battersea Studios and suggested that greater flexibility within the Industrial Business Park in this location in particular should be promoted, in order to enable sites such as Battersea Studios thrive and meet employment and residential demand.

Council Response

4.291 It is agreed that re-designating appropriate parts of the SIL for IBP uses would encourage investment in these areas and provide opportunities for more intensive use of the SIL. Local Plan policies should also seek to encourage other proposals which look to intensify the SIL for industrial and transport functions, although it is not considered appropriate to allow residential uses into the SIL, as set out in the response to question 51.

4.292 The consultation document asked:

Question 53

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

4.293 The GLA and Putney Labour Party (Councillor Peter Carpenter) agreed that the Local Plan should continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL. Conversely, Workspace Group PLC and Safestore Ltd expressed support for a more flexible, site-by-site approach.

Council Response

4.294 Given the demand for industrial floorspace that is forecast for the borough, it is considered appropriate to ensure that all sites within the SIL continue to provide the same - if not greater - quantities of B1(c), B2 or B8 floorspace.

Locally Significant Industrial Areas

4.295 The consultation document asked:

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?

4.296 The GLA and Putney Labour Party (Councillor Peter Carpenter) agreed that the Local Plan should continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within LSIAs. Panorama Antennas Ltd also supported the requirement of full replacement provision of existing B1(c), B2 and B8 floorspace in principle in order to maintain the character and function of LSIAs.

4.297 Conversely, Workspace Group PLC, TR Property Investment Trust PLC, South Western Estates Ltd, Ipsus Developments Ltd and Safestore Ltd expressed support for a more flexible, site-by-site approach which recognises actual and long-term demand.

Council Response

4.298 Given the demand for industrial floorspace that is forecast for the borough, it is considered appropriate to ensure that all sites within the LSIAs continue to provide the same - if not greater - quantities of B1(c), B2 or B8 floorspace.

4.299 The consultation document asked:

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?

4.300 The Putney Labour Party (Councillor Peter Carpenter) agreed that given the potential shortfall in industrial land over the plan period, the Local Plan should continue to only allow development that falls within the use classes B1(c), B2 and B8 in LSIAs. The GLA noted that this would be consistent with the Land for Industry and Transport SPG and considered that it should continue where there is evidence of demand.

4.301 The majority of respondents (Workspace Group PLC, TR Property Investment Trust PLC, Charterhouse Property Group, Safestore Ltd, Ipsus Developments Ltd, Panorama Antennas Ltd) generally supported a more flexible approach, enabling sites to be developed

for other uses that fall outside the above use classes where appropriate. Respondents generally considered that non B1(c), B2 and B8 uses are essential to improve the viability of and facilitate the refurbishment or re-provision of B1(c), B2 and B8 floorspace.

Council Response

4.302 Given the demand for industrial floorspace that is forecast for the borough, it is considered appropriate to only allow B1(c), B2 or B8 floorspace in the LSIA's. In some limited instances it may be appropriate to also allow other types of floorspace on a small-scale where this is required for the operation of industrial premises (eg ancillary office space) or for people working in the area (eg small cafes).

New Covent Garden Market (NCGM)

4.303 The consultation document asked:

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)?

4.304 All respondents (Putney Labour Party (Councillor Peter Carpenter), Battersea Society, GLA and Covent Garden Market Authority) generally agreed that the Local Plan should continue to protect the function of the New Covent Garden Market.

4.305 The Covent Garden Market Authority noted that the redevelopment proposals will provide facilities better suited to current activities and seek to provide flexible floorspace that is better able to respond to future changes in the food industry. They noted that while the market will operate on a reduced size site, the total trading space and level of activity will increase, and therefore, the suggestion that the market is consolidating is incorrect.

4.306 The Covent Garden Market Authority considered that it is important to ensure that wholesale market activities are protected not only from changes of use to non-employment uses, but also from changes of use to B Use Classes, as there could be pressure from such uses as the quantum of employment land further shrinks. They also considered that the policy needs to recognise that the wholesale market business will continue to change and develop in the future and therefore need to include some flexibility to reflect this.

Council Response

4.307 It is agreed that the Local Plan should continue to protect the function of the New Covent Garden Market, which is of strategic importance to London and provides a substantial amount of distribution, storage and business floorspace. It is also recognised that there are

plans underway to reconfigure the New Covent Garden Market site, to intensify uses and to make the market more outward-facing and increase its presence and public accessibility; these plans should continue to be encouraged in the Local Plan review.

4.8 EI8 - Redundancy of employment premises

Employment Uses Redundancy Criteria

4.308 The consultation document asked:

Question 57

Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?

4.309 Respondents generally agreed that the above criteria are appropriate in principle.

4.310 However, two respondents raised concerns in regard to the 18 month marketing requirement; Putney Labour Party (Councillor Peter Carpenter) suggested that the period be extended to two years and that the owner be required to demonstrate that all reasonable efforts have been made to market it, while Safestore Ltd considered a reasonable period to be one which reflects the average time a building of that type spends on the market. Safestore Ltd suggested that a policy test be introduced to demonstrate that a reasonable marketing exercise has been carried out or that there is evidence to demonstrate that there is no prospect of re-providing employment floorspace, rather than a strict 18 month term.

4.311 The GLA suggested that the criteria be applied to sites outside of SIL to avoid ad-hoc planning applications for non-industrial uses in SIL.

Council Response

4.312 It is agreed that the redundancy criteria in the adopted Local Plan remain appropriate. 18 months of marketing is considered to be appropriate to allow for a genuine and robust marketing campaign.

4.313 The consultation document asked:

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?

4.314 The GLA indicated support for the above list of additional criteria, on the basis that they are consistent with those set out in the Land for Industry and Transport SPG.

4.315 The Putney Labour Party (Councillor Peter Carpenter) suggested that an "all reasonable efforts to market it" criteria be included.

4.316 Councillor Rosemary Torrington suggested that BIDs could actively seek to market vacant spaces to attract new tenants and maintain a vibrant economy.

Council Response

4.317 It is considered appropriate to require premises to be vacant at the time of marketing, or for applicants to demonstrate that they were available at short notice for new businesses to move in. The criteria set in the Local Plan should ensure that all reasonable efforts have been undertaken to market the premises. Marketing vacant premises through BIDS may also assist, however this could be overly onerous if the mechanism for the BID to undertake marketing has not been established.

4.318 The consultation document asked:

Question 59

Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?

4.319 Safestore Ltd considered that detailed information regarding the marketing requirements should be set out in the Local Plan, and that the Plan should provide a reasoned justification for each requirement within each policy. Additionally, Safestore Ltd sought clarification with regard to requirements for redevelopment applications.

4.320 The Putney Labour Party (Councillor Peter Carpenter) considered that to demonstrate 'all reasonable efforts' as discussed above, the owner would need to provide details of marketing spend, including when and where this was made.

Council Response

4.321 It is agreed that the Local Plan should detail all requirements for marketing. It is agreed that all reasonable efforts should be undertaken to market business premises, however details of marketing spend would not be directly relevant; rather it is the method of marketing and the outcomes that are important in assessing demand.

Alternative Uses

4.322 The consultation document asked:

Question 60

Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?

4.323 Councillor Rosemary Torrington and the Putney Labour Party (Councillor Peter Carpenter) agreed that employment use should continue to be protected.

4.324 The GLA considered that restrictions on alternative uses for premises should be made subject to local demand for Town Centre uses and demonstrate viability. They also considered that any alternative uses should ensure that active frontages are maintained.

4.325 Safestore Ltd were of the view that restricting development on redundant sites will not meet the policy test set out by the NPPF which seeks to proactively drive and support sustainable economic development to deliver the homes and business units that the country needs by encouraging the effective use of previously developed land and by promoting mixed use development.

Council Response

4.326 It is appropriate to place some restrictions on alternative uses of redundant employment premises, in order to ensure that the new use contributes to meeting the demand for other commercial or community uses, and supports the function and vitality of the wider area.

4.327 The consultation document asked:

Question 61

Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?

4.328 Councillor Rosemary Torrington expressed support for the application of the above approach to Focal Points and the CAZ. The Putney Labour Party (Councillor Peter Carpenter) also expressed support for this approach, however noted that there may be areas where more flexibility is required and considered that an alternative use is preferable to a perpetually empty building.

4.329 The GLA suggested having regard to guidance set out in the CAZ SPG, which sets out priorities attached to housing relative to office and other strategic functions in the CAZ.

4.330 Safestore did not consider it appropriate or reasonable to place restrictions on alternative uses for office redevelopment in Focal Points or the CAZ for the reasons set out under their response to Question 60 above.

Council Response

4.331 It is appropriate to seek specific alternative uses in town and local centres, focal points and the CAZ. These parts of the borough generally feature a broader mix of uses, and redundant employment sites provide an opportunity to meet the demand for wider commercial and community uses.

4.332 The consultation document asked:

Question 62

Are there other places or situations in which alternative uses for redundant employment premises should be restricted?

4.333 The Putney Labour Party (Councillor Peter Carpenter) considered that alternative uses for redundant employment premises should be restricted where the proposed alternative use would conflict with adjacent uses.

Council Response

4.334 It is agreed that alternative uses should be appropriate to their context and that other Local Plan policies - particularly those relating to amenity - should be considered in redevelopment plans.

4.9 EI9 - Waste and wharves

4.335 The consultation document asked:

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?

4.336 The Putney Labour Party (Councillor Peter Carpenter), the Battersea Society and the GLA agreed that the above policies should retain their current wording and should be reviewed as part of the full Local Plan review. The Port of London Authority agreed in principle, however considered that any employment premises and land document should clearly explain that this is the approach which has been taken, to ensure that there is no confusion. They

also considered that it is important to clearly explain the approach proposed to comprehensively review a number of policies but to transfer the relevant parts of policies PL7 and DMI3 over to the Employment and Industrial Local Plan Document.

4.337 Conversely, the Western Riverside Waste Authority proposed that the review be undertaken now as they are concerned that other planning decisions relating to development plan documents and individual planning applications are undermining Policy PL 10. Safestore Ltd also agreed that undertaking a review of the above policies in conjunction with a review of the employment and industry policy options is appropriate, on the basis that neglecting to review the policies will result in non-compliance with the NPPF as the current policies do not take into account up-to-date evidence provided within the Employment Land Review.

Council Response

4.338 Following adoption of the Local Plan 2016, the next priority was to review the employment and industrial land policies. The evidence base for the review of the waste policies has commenced, however it is programmed to be finalised as part of the scope for the full review of the Local Plan. The evidence base for the review of the employment and industrial land policies does not contain any assessment of waste sites or update of criteria to assess potential or existing waste sites. It is considered that the existing Local Plan policies relating to waste remain up to date and sound. A review of waste policies at this stage would delay the Employment and Industry Local Plan review. The existing waste policies of the Local Plan 2016 (DMI5, DMI6, DMI7 and PL6 & PL7) are either contained in the same chapter of the Development Management Policies Document (DMPD) as the existing employment and industry policies, or form part of joint policies in the Core Strategy. For ease of use, it is considered that by removing chapter 5 of the DMPD in its entirety and retaining the current wording of DMI5, DMI6 and DMI7 of the DMPD within the review, clearer application and presentation of policy in both the remaining adopted Local Plan and the review document could be achieved. It is considered that this approach is in accordance with Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

4.339 The consultation document asked:

Question 64

Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?

4.340 All respondents generally supported the retention of the above sites at this stage. The Putney Labour Party (Councillor Peter Carpenter) considered that it would be sensible to await the review of the London Plan before reviewing these sites, while the Western Riverside Waste Authority considered that the sites should be retained but the boundary of the extent of the facilities should be reviewed. The Environment Agency supported the retention of these sites and noted that they are keen to ensure that the right waste and

resource management infrastructure is in place. They also noted the separate but close relationship between planning and permitting decisions. The GLA expressed support for the retention of these sites in line with policy 5.17 of the London Plan.

Council Response

4.341 It is agreed that sites allocated for waste management will continue to be retained in the adopted SSAD 2016. Each waste site allocation will be reviewed as part of the full review of the Local Plan.

4.342 The consultation document asked:

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?

4.343 The Putney Labour Party (Councillor Peter Carpenter), the GLA and the Environment Agency expressed support for retaining the existing policy approach at this stage.

4.344 The Western Riverside Waste Authority proposed that a review should take place now.

Council Response

4.345 The Council is will review its safeguarded wharves as part of the full review of the Local Plan. Similarly to the waste policies described above, it is considered that removing chapter 5 of the DMPD in its entirety and retaining the current wording relating to safeguarded wharves of policy DMI3 of the DMPD would allow for clearer application and presentation of policy. The strategic policy for safeguarded wharves (Core Strategy policy PL9) will be retained in the Core Strategy and not amended; this policy deals with the River Thames and the riverside more broadly and is outside of the scope of the Employment and Industry Local Plan review.

4.10 EI10 - Overall approach

4.346 A number of broad and overarching comments were made on the policy options document. Justine Greening MP was supportive of the approach put forward in the review and the principle of protecting land and premises for employment use. The Environment Agency raised a lack of consideration of flood risk as part of the review. TfL requested greater consideration of transport implications of the proposed policies including recognition of the proposed removal of the Wandsworth gyratory, considering pedestrian and cycle connectivity in Nine Elms, and ensuring transport accessibility is taken into account for all changes in designations. TfL also raised safeguarding and other issues connected to proposals for

Crossrail 2 as relevant for the Local Plan process. Historic England highlighted the potential heritage value of the boroughs' industrial areas and requested that appropriate characterisation work should be carried out to conserve and enhance assets of historic value. The Wandle Valley Regional Park Trust requested recognition of the importance of sites alongside the River Wandle in opening up access and connecting routes along the river.

4.347 National Grid and Natural England confirmed that they had no comments to make on the policy options consultation

Council Response

4.348 The concerns of the Environment Agency are noted. The flood risk policies (DMS5, DMS6 & DMS7 of the DMPD and PL2 of the Core Strategy) of the adopted Local Plan will remain as adopted and will continue to be applied. These policies are intended to be reviewed in the full review of the Local Plan. In accordance with the Planning Practice Guidance, the sequential test and the exception test will be applied to each of the site allocations informed by the updated Strategic Flood Risk Assessment.

4.349 The comments of TfL are noted. The proposed removal of the Wandsworth gyratory is a significant and transformational project for the borough which is strongly supported in the Local Plan, and will need to be reflected in the area spatial strategy for the Wandle delta and relevant site allocations. Improvements to pedestrian and cycle connectivity in the Nine Elms area are a key priority, and this is reflected in the area spatial strategy set out in the adopted Local Plan. Nearby sites, such as those designated as appropriate for Industrial Business Park uses in the SIL, should support this increased connectivity where possible. The adopted Local Plan already sets out sites and routes safeguarded for Crossrail 2 and discussions are on-going with TfL and others to ensure the best outcome for this important piece of strategic infrastructure.

4.350 It is agreed that heritage assets should be protected and enhanced, and that the industrial heritage of the borough is an important part of its history and makes a valuable contribution to its character, particularly along the Wandle valley and around Queenstown Road.

4.351 The importance of the River Wandle to the borough, and the strategic objectives for the Wandle Valley Regional Park, should be reflected in the Local Plan review and opportunities sought for opening up access and connecting routes along the river.

4.352 The consultation document asked:

Question 66

Do the policy options set out in the sections above accurately reflect the evidence base?

4.353 The majority of respondents agreed that the policy options accurately reflect the evidence base (Putney Labour Party (Councillor Peter Carpenter), Environment Agency, Ipsus Developments Ltd and Safestore Ltd), however a number raised concerns in regard to the evidence base itself and its applicability to this review.

4.354 To this end, Ipsus Developments Ltd considered that the ELPS is a high level document which takes into account need at a broader level and, therefore, fails to fully consider the issues at some of the smaller industrial areas. They suggested that a more in-depth examination be undertaken at finer grain. Similarly, Safestore Ltd questioned whether the evidence base appropriately considers demand and supply options, based on a fundamental misunderstanding of a number of the Borough's employment sites. Safestore Ltd considered that the approach has been inconsistent in that areas with the same offer and characteristics have been treated in materially different ways.

4.355 TR Property Investment Trust PLC were of the view that the Strategic Objectives fail to acknowledge the importance of intensification on existing industrial sites.

Council Response

4.356 It is not agreed that the ELPS is purely a high-level document or that it misunderstands the borough's employment sites. The ELPS draws on a wide range of indicators and evidence and includes detailed site surveys and assessments. Further opportunities to engage with relevant stakeholders will be taken in order to ensure that the Local Plan policies are relevant for each site and that a consistent approach is taken, taking into account the different site characteristics.

4.357 It is not agreed that the Strategic Objectives fail to consider the importance of intensifying industrial sites; they set out the need to maximise employment potential of land through both safeguarding land for business and industrial use and promoting development for employment in appropriate locations to increase job and business opportunities.

4.358 The consultation document asked:

Question 67

Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?

4.359 The Environment Agency suggested using the Open Gov Data service for the most up-to-date and accurate environmental evidence.

4.360 Safestore Ltd noted that the Local Plan review should take into consideration the representations made and subsequently summarised in this report and additionally, recommended that the Council engage with employment floorspace landlords and tenants in order to ensure that the evidence base used in the formulation of policies is representative of the existing market.

Council Response

4.361 It is agreed that representations should be fully considered in the formulation of the proposed Local Plan policies and that opportunities to engage with a wide variety of stakeholders should be taken. The datasets highlighted by the Environment Agency are useful and should be utilised to inform plans and decisions.

Appendix 1: List of respondents

Respondents are listed in alphabetical order (by surname where submitted by an individual).

Consultee	Agent	Site
38-48 Havelock Terrace	Nicholas Taylor & Associates	38-48 Havelock Terrace
Amec Staff Pensions Trustee Ltd	Jones Lang LaSalle Ltd	37 Lombard Road
Arts Council England		
Association for Cultural Advancement through Visual Art		
BAF Graphics		25-27 Lydden Road
Battersea Arts Centre		
Battersea Project Land Company Ltd	DP9	Battersea Power Station
The Battersea Society		
Big Yellow Self Storage Company Ltd	Quod	100 Garratt Lane & York Road Business Centre
Callington Estates Ltd & The Callington Trust	Simply Planning Ltd	53 Lydden Grove
Charterhouse Property Group	Savills	Point Pleasant Works (HSS Hire), Putney Bridge Road
Chocolate Films		
Covent Garden Market Association	Jones Lang LaSalle Ltd	New Covent Garden Market
Creative Industries Federation		
Enable Arts		
Environment Agency		
Greater London Authority		
Justine Greening MP		
Health and Safety Executive		
Historic England		
Ipsus Developments Ltd	Boyer Planning	30-54 Lydden Road, Bendon Valley
Bob Knowles		
London Borough of Richmond		
London Square	Quod	B&Q Swandon Way
National Grid	Amec Foster Wheeler	
Panorama Antennas Ltd	Gerald Eve	61-63 Frogmore and 10 Dormay Street

Consultee	Agent	Site
Alan Pates		
Port of London Authority		
Putney Labour Party		
Rockspring Property Investment Managers	Turley	Jaggard Way
Safestore Ltd	GVA Grimley	Ingate Place, 19 Lombard Road and 1 Bendon Valley
Schroders Real Estate Investment Management	Deloitte	Battersea Studios
Scotia Gas Network (SGN) and National Grid	Quod	Wandsworth Gas Holder
SG Capital Group Ltd	Montagu Evans	150A-170 Penwith Road & 2-8 Thornsett Road
South Western Estates Ltd	Savills	Land to the rear of 319-321 Merton Road
St William Homes		Wandsworth Gas Holder
Transport for London (Planning)		
Transport for London (Property)		
The Theatres Trust		
Cllr Rosemary Torrington		
TR Property Investment Trust PLC	Rolfe Judd Planning	Ferrier Street Industrial Estate
Wandle Valley Regional Park Trust		
Western Riverside Waste Authority	Carter Jonas	
Workspace Group PLC	Rolfe Judd Planning	Hewlett House and Avro House, Havelock Terrace; Riverside Business Centre, Bendon Valley

For more information write to:

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Planning and Transport,
Town Hall,
Wandsworth High Street,
London SW18 2PU

Telephone: (020) 8871 6649, 6650, 7218, 7420

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or visit our website: www.wandsworth.gov.uk/planning