

# Wandsworth Local Plan Employment and Industry Document

## Suggested Additional Modifications



## Schedule of Suggested Additional Modifications - Local Plan Review: Employment and Industry Document

Table 1 sets out the Suggested Additional Modifications.

Changes are presented in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text.

The Schedule is listed in policy order.

**Table 1: Suggested Additional Modifications**

Ref.	Title	Number	Page No.	Change proposed	Reason
AM/01	Introduction	Paragraph 1.1	3	Amend fourth sentence of paragraph 1.1 to read: 'It will guide development in the borough over the next 15 years <u>(2016-2031)</u> and will be used to inform decisions on planning applications.'	To clarify that the 15 year period identified will be the timeframe 2016-2031 in accordance with the Inspector's Main Issues and Questions.
AM/02	Figure 1 Economic Use Intensification Area	Figure 1	24	Modify Figure 1 identifying the EUIA sites to include: A key which refers to the EUIA name as referred to in policy EI2.	To clearly identify the sites referred to in policy EI2 with the correct related site on the proposals map to be produced as an update to the proposed additional modification table for consideration at the hearing sessions in accordance with the Inspector's Main Issues and Questions.
AM/03	Locations for new employment floorspace	Policy EI2	25	Amend second sentence of paragraph EI2.2 to read:  '...To ensure there is no detrimental impact on town centres, applications for development that would result in a net increase in employment (use class <u>B1a</u> ) floorspace will need to be justified by a sequential test.'	It is considered that Policy EI2 is sound and based on robust and credible evidence. For clarity Policy EI2, point 2 is proposed to be altered due to a typo, the policy should require applications which would result in a net increase in employment use class B1a to demonstrate that there is no detrimental impact on the town centres.

AM/04	Locations for new employment floorspace	Policy E12.4	25	<p>Delete;</p> <ul style="list-style-type: none"> <li>● <del>Former Gala Bingo Hall/Riverside Business Park, Bendon Valley</del></li> <li>● <del>Gas Holder, Hunts Trucks, Delta Business Park, Armoury Way</del></li> <li>● <del>Panorama Antennas, Frogmore</del></li> <li>● <del>Causeway Island, Keltbray Site and Wentworth House, Dormay Street</del></li> <li>● <del>Ferrier Street</del></li> <li>● <del>Frogmore Depot</del></li> <li>● Chelsea Cars and Kwik Fit garage, Armoury Way</li> </ul> <p>Replace with;</p> <table border="1" data-bbox="808 676 1391 1378"> <thead> <tr> <th data-bbox="808 676 1095 743">Economic Use Intensification Areas</th> <th data-bbox="1095 676 1391 743">Site Allocation</th> </tr> </thead> <tbody> <tr> <td data-bbox="808 743 1095 903">Bendon Valley</td> <td data-bbox="1095 743 1391 903"> <ul style="list-style-type: none"> <li>● Riverside Business Centre and former Bingo Hall</li> </ul> </td> </tr> <tr> <td data-bbox="808 903 1095 1378">Central Wandsworth</td> <td data-bbox="1095 903 1391 1378"> <ul style="list-style-type: none"> <li>● Panorama Antennas</li> <li>● Causeway Island including land to the east</li> <li>● Keltbray Site, Wentworth House and adjacent land at Dormay Street</li> <li>● Ferrier Street</li> <li>● Frogmore Depot</li> </ul> </td> </tr> </tbody> </table>	Economic Use Intensification Areas	Site Allocation	Bendon Valley	<ul style="list-style-type: none"> <li>● Riverside Business Centre and former Bingo Hall</li> </ul>	Central Wandsworth	<ul style="list-style-type: none"> <li>● Panorama Antennas</li> <li>● Causeway Island including land to the east</li> <li>● Keltbray Site, Wentworth House and adjacent land at Dormay Street</li> <li>● Ferrier Street</li> <li>● Frogmore Depot</li> </ul>	New formatting is proposed to show which Site Allocations fall within which EUIAs.
Economic Use Intensification Areas	Site Allocation										
Bendon Valley	<ul style="list-style-type: none"> <li>● Riverside Business Centre and former Bingo Hall</li> </ul>										
Central Wandsworth	<ul style="list-style-type: none"> <li>● Panorama Antennas</li> <li>● Causeway Island including land to the east</li> <li>● Keltbray Site, Wentworth House and adjacent land at Dormay Street</li> <li>● Ferrier Street</li> <li>● Frogmore Depot</li> </ul>										

					<ul style="list-style-type: none"> <li>Hunts Trucks, adjoining sites including the Gasholder</li> </ul>	
				Chelsea Cars and KwikFit	<ul style="list-style-type: none"> <li>Chelsea Cars and KwikFit</li> </ul>	
AM/05	Locations for new employment floorspace	Policy E12.4	26	<p>Add wording to read:</p> <p>'The site allocation for each area sets out the required approach to the provision of economic and other uses on the site and must be complied with. <u>Where a site allocation requires a 25% increase in floorspace this will be applied to the net internal area.</u>'</p>	Modifications as a result of internal discussion. Add wording to end of para 4 to state that where the increase of 25% floorspace is sought it will be the net internal area.	
AM/06	Figure 2 Strategic Industrial Location	Figure 2	28	Amend title of Figure 2 to read: Figure 2a Strategic Industrial Locations	The title for figure 2 has been amended as a result of an additional map being added as Figure 2b. (Please refer to MM/03)	
AM/07	Figure 2 Strategic Industrial Location	Figure 2	28	<p>Modify Figure 2 identifying the SIL sites to include:</p> <p>A key which refers to the SIL name as referred to in policy E13.</p>	To clearly identify the sites referred to in policy E13 with the correct related site on the proposals map to be produced as an update to the proposed additional modification table for consideration at the hearing sessions in accordance with the Inspector's Main Issues and Questions. Also refer to MM/03	

AM/08	Figure 3 Locally Significant Industrial Areas	Figure 3	29	Modify Figure 3 identifying the LSIA sites to include: A key which refers to the LSIA name as referred to in policy EI3.	To clearly identify the sites referred to in policy EI3 with the correct related site on the proposals map to be produced as an update to the proposed additional modification table for consideration at the hearing sessions in accordance with the Inspector's Main Issues and Questions.
AM/09	Figure 4 Employment Protection Areas	Figure 4	30	Modify the map in figure 4 identifying Employment Protection Areas sites to include; a corresponding key identifying the related site which is referred to in policy EI3.	To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the proposals map.
AM/10	Figure 5 Employment Protection Areas	Figure 5	31	Modify the map in figure 5 identifying Employment Protection Areas sites to include; a corresponding key identifying the related site which is referred to in policy EI3.	To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the proposals map.
AM/11	Figure 6 Employment Protection Areas	Figure 6	31	Modify the map in figure 6 identifying Employment Protection Areas sites to include; a corresponding key identifying the related site which is referred to in policy EI3.	To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the proposals map.

AM/12	Protected employment land and premises	Policy EI3	32-34	<p>Amend numbering within policy to read:</p> <p>'1. <u>3</u>. Office (B1a) floorspace....'</p> <p>'2. <u>4</u>. Redevelopment proposals will only....'</p> <p>'3. <u>5</u>. Premises that provide economic....'</p> <p>'4. <u>6</u>. Employment uses will be protected....'</p> <p>'5. <u>7</u>. Mixed use development including residential....'</p> <p>'6. <u>8</u>. Railway arched and viaducts provide....'</p> <p>'7. <u>9</u>. The wholesale function of New Covent ....'</p>	<p>Typo error. The numbering of policy EI3 should be continuous and therefore needs to be renumbered.</p> <p>To read point 1 through to 9.</p>
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AM/13	Protected employment land and premises	Policy E13.2 (Protecting office floorspace)	32	<p>Amend wording at Protecting office floorspace point 2 (in proposed revised numbering of the submission version) to read;</p> <p><u>'Redevelopment proposals in the locations set out in point 3 above will only be permitted if:'</u></p>	<p>To clarify that the criteria for redevelopment proposals in point 4 (of the proposed revised numbering, and point 2 (Protecting office floorspace) of the previous numbering) refers to the locations that have been identified to protect office floorspace.</p>
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AM/14	Protected employment land and premises	Policy E13.6c	34	<p>Add wording to read:  'Non B class uses of railway arches will only be supported if there is no demand for B class use of the premises, <u>in accordance with policy E17.</u>'</p>	<p>For consistency, and to clearly identify the test for demand of industrial premises the modification proposed cross refers to policy E17.</p>
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AM/15	Paragraph	2.24	39	<p>Add a new paragraph following paragraph 2.24 to read:</p> <p><u>‘Poorly designed workplaces combine multiple pathways for health risks – from exposure to indoor pollutants and increased risk of asthma to lack of physical activity during work hours leading to obesity and fatigue. People spend significant parts of their lives working in buildings that affect their health. As a consequence new development proposals should consider the impacts on the health and wellbeing of employees. Examples include good access to natural daylight and locating and making staircases more convenient and attractive so employees can use them on a regular basis. By incorporating Active Design into employment environments, employers stand to benefit from employees’ increased productivity and improved quality of life.’</u></p> <p>Add a new 7th bullet point to Policy EI5 1:</p> <p>‘Good Telecommunications connectivity, including superfast broadband connections where appropriate;</p> <p><u>Active Design which encourages wellbeing and greater physical movement as part of everyday routines.’</u></p>	<p>Whilst it is considered that the criteria of Policy EI5 together with the adopted Development Management Policies DMS1 (General Development Principles Sustainable urban design and the quality of the environment), would generally cover Active Design principles it is agreed that wording on Healthy and Active Design can be incorporated as a new paragraph following para 2.24 to clarify that Active Design should be considered as part of a requirement for new employment development. A minor amendment to Policy EI5 can also be accommodated to reflect this consideration.</p>
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AM/16	Requirements for new employment development	Policy EI5	39	<p>Amend wording at first sentence of EI5.1 to read:</p> <p><u>'New developments for economic uses must provide a good standard of accommodation and be suitable flexible workspace which would allow for a range of unit sizes for use by a wide range of occupiers.'</u></p>	<p>The policy is considered to be sound and based on a robust and credible evidence base. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy EI5 which seeks any redevelopment to retain existing businesses on site following development, with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.</p>
AM/17	Requirements for new employment development	Policy EI5	39	<p>Amend Policy EI5 (2) bullet point 2 to read:</p> <p><u>'Floor to ceiling heights of 3.35m or similar where justified;'</u></p>	<p>It is considered that 3.35m is a standard height for Industrial uses, however it is acknowledged that where the buildings are being designed for specific end users this may require a slight deviation from the 3.35m height. A minor change is therefore proposed to the wording of the policy to accommodate this flexibility to accommodate a variation</p>

					in height to suit the requirements of the user where justified.
AM/18	Managing land for industry and distribution	Paragraph 2.29	41	<p>Delete paragraph 2.29 :  <del>The northern and western edges of the Queenstown Road, Battersea SIL will be promoted for designation in the forthcoming London Plan as Industrial Business Park. The Summerstown LSIA will be promoted for designation in the forthcoming London Plan as part of the North Wimbledon SIL. The North Wimbledon SIL is currently made up of the industrial estates at Durnsford Road and Plough Lane in the London Borough of Merton.</del></p> <p>And replace with the following wording:  <u>'The northern and western edges of the Queenstown Road, Battersea SIL will be designated as Industrial Business Park (IBP). All development in these areas will be required to provide floorspace for industrial uses. Those proposals which additionally include research and development (B1b) or SME office accommodation (B1a) may also be appropriate provided these uses do not erode the industrial function and character of the SIL. The IBP designation will facilitate at this accessible location the development of intensified employment uses, complementing the anticipated digital cluster focussed on the emerging Battersea Power Station town centre, whilst maintaining compatible business uses within the SIL.'</u></p>	<p>Paragraph 2.29 is proposed to be deleted in recognition that the emerging London Plan no longer recognises IBP as a category of designation.</p> <p>In recognition that the Draft London Plan proposes to designate the Summerstown industrial area as a SIL designation, it is proposed to allocate Summerstown as a SIL as opposed to a LSIA designation.</p> <p>A new paragraph has been proposed which provides details of the IBP designation and defines types of development that are suitable.</p>

AM/19	Redundancy of employment premises	Policy E17.1	43	Amend wording of second bullet point in Policy E17.1 to read: ' <del>Convincing</del> <u>Justifiable</u> evidence must be provided to demonstrate that it is not feasible or viable to refurbish, renew or modernise the premises in order to meet the requirements of existing or future occupiers.'	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to justifiable in accordance with the Inspector's Main Issues and Questions.
AM/20	Redundancy of employment premises	Policy E17.3	43	Amend wording of first sentence in Policy E17.3 to read: 'For larger offices that provide over 1,000 sq ms of office floorspace, <del>convincing</del> <u>justifiable</u> evidence must be provided to demonstrate that it is not feasible or viable to adapt the office floorspace as smaller business (B1) units to meet demand from SME business.'	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to justifiable in accordance with the Inspector's Main Issues and Questions.
AM/21	Waste	Policy E18.6	47&48	Add wording to Policy E18.6, (iv) to read: 'Is proposed on a site meeting the following locational criteria: <ul style="list-style-type: none"> <li>• 'The site is not within, or partly within, nature conservation areas protected by current international and national policy; and</li> <li>• the site does not contain <u>or adversely affect the setting of</u> Heritage Assets'</li> </ul> Add wording at Policy E18.7, (vii) to read:  'sites which contain no archaeological features <u>and do not adversely affect heritage assets or their settings;</u> '  Add wording at Policy E18.9,(vi) to read:	A minor amendment is proposed to take into account heritage assets.

				'the impact of development on Heritage Assets or their settings;'	
AM/22	Site 41 (Hunts Trucks, adjoining sites including Gasholder)	Site Allocation	59	Amend wording to read:  'Redevelopment of the site should provide at least a 25% increase in the <u>existing</u> amount of industrial (use class B1c/B2/B8/SG) and office (use class B1a) floorspace.'	The intention of the site allocation is to seek to reprovide the existing quantum and type of floorspace and the 25% increase will be based on the existing floorspace use. Therefore the site allocation wording is proposed to be amended to clarify this position.
AM/23	Site 42 (Keltbray Site, Wentworth House and adjacent land at Dormay Street).	Site Allocation	62	Amend wording to read:  'Redevelopment of the site should provide at least a 25% increase in the <u>existing</u> amount of industrial (use class B1c/B2/B8/SG) and office (use class B1a) floorspace,.....'	The intention of the site allocation is to seek to reprovide the existing quantum and type of floorspace and the 25% increase will be based on the existing floorspace use. Therefore the site allocation wording is proposed to be amended to clarify this position.
AM/24	Site 42C (Ferrier Street)	Site Allocation	69	Add wording after second sentence of 'Site Allocation' to read:  'Redevelopment of the site should provide at least a 25% increase in the <u>existing</u> amount of industrial (use classes B1c/B2/B8/SG) and office (use class B1a) floorspace.'	The intention of the site allocation is to reprovide the existing floorspace and the 25% increase is to be based on the existing floorspace use. It is considered that a minor amendment be added to clarify this point.
AM/25	Site 42D (92 Putney Bridge Road - HSS Hire)	Site Allocation	71	Amend wording at:  'Site description' and 'Site allocation' to read:  Site description: The site is occupied by a single storey <del>industrial</del> building, used for tool hire.	Upon further assessment the council considers that the existing use of the HSS Hire unit (92 Putney Bridge Road) does not fall into either office or industrial use classification. The site allocation at 92 Putney Bridge Road allows for redevelopment to include

				<p>'Site Allocation: The site is located within an Employment Protection Area. Redevelopment of the site should re-provide the <u>existing employment generating industrial</u> floorspace <del>or, if there is no demand for this use, should provide with</del> the same quantity of employment floorspace <del>(as set out in policy E13)</del>. Redevelopment could include residential uses as well as employment use, subject to the requirements of policies E13 and E15.'</p>	<p>residential uses subject to the requirements of policies E13 and E15. The site falls within a cluster of sites that are within an employment protection area; 57 Putney Bridge Road, 8892 Putney Bridge Road and 23 Adelaide Road. To ensure the intention of the site allocation is clear the wording is proposed to be amended to reflect that the existing use is not industrial floorspace and any redevelopment must include the same quantity of floorspace as employment generating floorspace due to its location as a cluster of employment generating uses.</p>
AM/26	Site 50 (Cory Environmental Materials Recycling Facility)	Site Allocation	84	<p>Amend wording to read: '...(see <u>Site 3.5 for the map of policies map reference 51 for the safeguarded wharf boundary</u>).'</p>	<p>The site allocation says "see site 3.5 for the map of the safeguarded wharf boundary" – site 3.5 is no longer correct (this was the Adopted Local Plan Site Specific Allocation Document 2016 number). For clarification new reference numbers are proposed.</p>
AM/27	Site 99F Riverside Business Centre and former Bingo Hall, Bendon Valley	Site Allocation	103	<p>Amend to read: 'Site Allocation' section to read: 'Redevelopment of the site should provide at least a 25% increase in the <u>existing</u> amount of <del>both</del> industrial (use classes B1c/B2/B8/SG) and office (use class B1a) floorspace.'</p>	<p>The intention of the site allocation is to seek to reprovide the existing quantum and type of floorspace and the 25% increase will be based on the existing floorspace use. Therefore the site allocation wording is proposed to be amended to clarify this position.</p>

