

**London Borough of Wandsworth Local Plan; Publication (Regulation 19)
Version (January 2022)
Representation on behalf of Workspace Management Limited**

We write on behalf of Workspace Management Limited to make representations on the London Borough of Wandsworth's Local Plan (Regulation 19 version) which is out for public consultation. Our representations principally relate to:

- **Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F)**

Background

Workspace Management Limited own the entirety of the Riverside Business Centre and Flip Out Building which forms the entire site allocation. The Council granted planning permission in 2020 (reference: 2018/4176) for a mixed-use development comprising 5 buildings ranging from 5 to 9 storeys in height to provide flexible business floorspace, assembly and leisure floorspace and 402 residential dwellings.

The adopted Employment and Industry document allocates the site (Site Allocation 99F) for a '*mixed use development including residential and economic uses. Redevelopment of the site should provide at least a 25% increase in the existing amount of industrial and office floorspace*'. The site is also designated as an Economic Use Intensification Area, which according to adopted Policy EI2 are areas which have capacity to provide intensified industrial uses and increased business floorspace and where residential uses will also be appropriate where this assists with developing more intensive economic uses.

Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F)

Workspace are encouraged by the Councils decision to retain the site allocation WV1 (map ref:99F) within the Local Plan (Reg 19 version), however the changes to the wording of the site allocation is contrary to an approved scheme for the site and there is no evidence for the proposed changes. It is considered that the site allocation is not justified and is unduly restrictive.

Land use

The Site Allocation WV1 (Map ref 99f) amends the wording of the existing site allocation (99F) and states '*Mixed-use development including residential and economic uses. Redevelopment of the site should provide at least **50% increase** in the existing amount of industrial and office floorspace*'. The new wording of the site allocation requires a significant uplift in existing commercial floorspace on the site going forward and an increase from 25% (adopted allocation) to 50% (new allocation).

The approved scheme was consented on the basis that the re-provision of existing plus a 25% uplift in existing office and industrial floorspace was being provided in line with the adopted site allocation and was deemed appropriate by the Council at the time of consent. Draft Policy LP37 states that for proposals in an Economic Use Intensification Area, proposals for mixed use developments including residential will be supported where; the provision of industrial floorspace will be fully re-provided or intensified. Draft Policy LP38 goes on to state that proposals which would result in the existing

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quantum of office and industrial floorspace both being fully replaced will be supported. These policies therefore state that existing quantum of floorspace should be re-provided where a mixed-use development is proposed, the policy does not require a significant uplift in existing commercial floorspace where a mixed-use scheme is proposed.

It is considered that the requirement to re-provide and increase the existing industrial and office floorspace by a 50% increase is significant and is not justified by evidence. It must also be noted that this has not been viability tested and there is no evidence to state whether a mixed-use scheme could deliver a 50% uplift in existing office and industrial floorspace as well as achieve the other requirements of the site allocation, including significant public realm contributions, a riverside walk and a new footbridge.

The provision of residential accommodation in this site allocation acts as an enabler of redevelopment. The residential accommodation is required to bring forward the redevelopment and uplift of light industrial/ commercial floorspace. The proposed wording which seeks 50% uplift will automatically result with a reduction of residential accommodation on the site to enable the additional commercial floorspace. Workspace have confirmed that this would not be viable.

Tall Building

The draft site allocation states that the site is located within a mid-rise building zone MB-C1-02 and the maximum appropriate height for the zone is 6 storeys. The allocation states that *'the height of development within that zone should not exceed the heights of, and be in accordance with, the mid-rise building maps. Development proposals for tall buildings will not be supported.'* Draft Policy LP4 states that buildings which are of 7 storeys or over or 21 metres or more from ground level will be considered tall buildings in Wandsworth.

The amended site allocation would contradict the current planning permission for the site which was granted in 2020 (reference: 2018/4176). This planning permission approved a mixed-use scheme comprising of buildings ranging from 5-9 storeys in height and which provided a minimum of 25% uplift on the existing commercial uses. At the time of consent the Council considered the site to be appropriate for tall buildings. The amendments to the policy are therefore unduly restrictive and is contrary to the approved scheme for the site and no justification or evidence as to why the Council no longer consider this site suitable for tall buildings has been provided. This site allocation is therefore not justified and not based on proportionate evidence.

In summary, the amended site allocation wording requires the developer to deliver a significantly larger uplift in existing office and industrial floorspace whilst also restricting the building heights on site to below 7 storeys without justification for reasoning or evidence that this would be viable. It is considered that Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F) is unduly restrictive and unjustified.

Workspace consider that the site allocation should remove the requirement to provide 50% uplift and revert to the adopted site allocation requirement of 25% uplift.

Workspace consider that the site allocation must acknowledge that a tall building is considered appropriate on this site in line with the planning permission.