



LONDON BOROUGH OF WANDSWORTH
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 17:
BUILDING A STRONG ECONOMY
(POLICIES LP33 - LP40)

THURSDAY 24 NOVEMBER 2022

Abbreviations

BDTQ – Battersea Design and Technology Quarter

CAZ – Central Activities Zone

ELPS – Employment Land and Premises Study

LP – The London Plan

NPPF – National Planning Policy Framework

VNEB OA - Vauxhall Nine Elms Battersea Opportunity Area

WLP – Wandsworth Local Plan

LPEID – Local Plan Employment and Industry Document

Are the requirements of the Strong Economy policies justified by appropriate available evidence, having regard to national guidance, local context, and the London Plan?

The requirements of the policies in Chapter 17 ‘Building a Strong Economy’ are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence are as follows:

- [Employment Land and Premises Study October 2020](#) (SD-034)
- [Industrial Intensification Primer, Mayor of London January 2017](#) (SD-035)
- [Industrial intensification and co-location through plan-led and masterplan approaches, Practice Note Mayor of London November 2018](#) (SD-036)
- [Industrial Intensification and Co-Location Study: Design and Delivery Testing, Mayor of London October 2018](#) (SD-037)
- [Creating Open Workspace 2015](#) (SD-039)
- [Battersea Design and Technology Quarter Economic Appraisal & Design Framework \(2020\)](#) (SD-083)
- [Housing and Economic Land Availability Assessment January 2022](#) (SD-047)
- [Safeguarded Wharves Review 2018-2019](#)

Chapter 17 ‘Building a Strong Economy’ sets out the policies for a clear economic strategy which positively and proactively encourages sustainable economic growth, identifying sites and inward investment opportunities in order to meet anticipated needs over the plan period and supports the implementation of SDS1 (see the Council’s Statement in relation to Main Matter 2). The policies are considered to be in accordance with the National Planning Policy Framework (NPF) and in general conformity with the London Plan.

The strategy will promote sustainable economic development in the borough which:

- delivers the right type of floorspace in the most suitable locations;
- supports existing businesses and attracts new enterprises, particularly in the creative and technology sectors;
- provides opportunities for local people to find employment and to develop skills, enabling them to get on in life; and
- recognises and safeguards the important contribution that the borough’s economy makes to London as a whole.

In accordance with national and London Plan policy, the borough's Town Centres and strategic reservoir of industrial land will remain the focus for accommodating office and industrial uses, respectively. It is recognised, however, that the capacity of these locations is insufficient to accommodate the scale of demand. As such, the Plan sets out provisions for the strategic transformation and intensification of two areas – the Wandle Delta sub-area and the Battersea Design and Technology Quarter (BDTQ) – through the redevelopment of underutilised land for a mix of uses to provide new flexible economic floorspace, creating jobs and stimulating entrepreneurship, alongside the delivery of homes and local facilities in the Wandle Delta sub-area. This is supported by targeted growth at other key locations within the borough, such as around Clapham Junction Station, to ensure that the benefits of development are sustainably delivered throughout the borough.

The policies in Chapter 17 are aligned with the requirements of the NPPF, paragraph 82, that planning policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth” and to “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”, and LP34 seeks to deliver the ambitions of London Plan paragraph 6.5.3, which states that “innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews”.

The evidence which supports the employment policies of the Plan (LP33 – LP40 inclusive) is set out above. In particular, the Employment Land and Premises Study (ELPS) (SD-034) forecasts that there will be a net requirement of 8.6 hectares of industrial and waste management land up to 2034, and for an additional 22,500 sqm of office floorspace in the local / sub-regional office market in that same timeframe. Policies LP33 (Promoting and Protecting Offices) and LP34 (Managing Land for Industry and Distribution) set out how the borough plans to meet this need and the Housing and Economic Land Availability (SD-047) Assessment sets out the capacity to do so.

Policy LP33 (Promoting and Protecting Offices)

For the assessment of the borough's identified need for office premises, the Employment Land and Premises Study (SD-034) considers two distinct property markets within the borough, which cater for different users. The first is the emerging office market located within the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA), in London's Central Activities Zone (CAZ). This comprises high quality and high value modern office space which caters for businesses operating at a regional, national or international scale, which is significantly different to the stock of office premises found elsewhere in the borough. The

second and larger component – which comprises over 80% of the borough’s total office floorspace – is a local/sub-regional market which caters for small and medium-sized businesses serving customers within the borough and in areas across the south and west of London. This distinction is set out within the Local Plan in paragraph 18.6.

VNEB OA: The ELPS identified that approximately 205,000 sqm of planned office development within the VNEB OA is expected to have been completed by 2024. This is corroborated by the Council’s latest Authority Monitoring Report on Non-residential Development Report (2019-20 and 2020-21), which suggests there was a pipeline of 191,678 sqm of office floorspace within in this location for the year 2020-21. The study noted that the planned redevelopment of the VNEB OA is creating a step change in office provision in the borough and will form an important addition to the Central London office market, with analysis indicating that the level of supply is likely to provide for demand for such space arising within future demand in this market.

Local / sub-regional market:

Need: The borough’s ELPS indicates that within the local / sub-regional office market in Wandsworth (assumed to be all locations outside of the VNEB OA), there is a net additional requirement for 22,500 sqm of office floorspace to 2034, once vacant floorspace and transitional vacancies have been factored in. This figure is taken from page 116 of the ELPS study, which outlines the difference between supply and demand of office floorspace in the borough (See Table 7.1).

Capacity: The capacity for office floorspace is set out within the borough’s Housing and Economic Land Availability Assessment (SD-034). This analysis has identified that the supply of office capacity over the period to 2037/38 outside the Vauxhall, Nine Elms and Battersea Opportunity Area is approximately 52,000 sqm, which meets the identified need. As set out within the HELAA (Table 6), this is not considered to be an oversupply as the biggest sources of this supply (32,964 sqm) relates to existing planning applications, indicating a high level of demand for this use and that this capacity would be suitable to accommodate office provision should it materialise in the latter years of the Plan.

Policy LP34 (Managing Land for Industry and Distribution)

For the assessment of the borough’s identified need for industrial land, the Employment Land and Premises Study (SD-034) sets out the following:

Core Industrial Need

The ELPS forecasts a net requirement of 35,700 sqm, or its land equivalent value of 5.5ha, is required to accommodate the demand for 'core industrial uses' (e.g. B1c, B1b, B2, B8), which arises in an approximately 3:1 ratio for additional storage and distribution uses (Use Class B8) and light industrial uses / research and development facilities (now falling within Class E). The need for these industrial uses offsets a smaller anticipated reduction in the floorspace required by the borough to accommodate general industrial uses (Use Class B2). This is all derived from the forecasting exercise – and the figures are set out on p.114 of the ELPS, see Table 6.13 and 6.14.

The land equivalent figure is derived by applying the GLA's 65% plot ratio to the floorspace figure (e.g. $35,700 / 0.65 = 54,923$), which equates for approximately 5.5ha based on the fact that 1ha is 10,000 sqm).

Wider Industrial Need

The ELPS study identifies a requirement for industrial land figure of 8.6ha between 2019 and 2034. How this is calculated is set out in Table 7.2 of the ELPS study, p. 118). This consists of the core industrial need above (5.5ha) with the waste need, and then factors in optimal frictional vacancy (for turnover of businesses). In addition to the 35,700sqm or its land equivalent value of 5.5ha that will be required to accommodate demand for core industrial uses, up to 2.1ha of land will be needed to accommodate additional demand for wider industrial uses, including waste management (see Policy LP13), Circular Economy, Recycling and Waste Management), while the remaining 1ha of this requirement is to ensure that the borough has an optimal amount of 'frictional vacancy' to allow for the efficient churn of occupiers

Capacity

Table 8 of the ELPS identifies 44,828sqm of supply to meet the identified additional core industrial floorspace needs of 35,700sqm, providing a buffer of 9,128sqm.

The importance of retaining and protecting the borough's existing remaining industrial land within that capacity, and the need to provide intensified industrial floorspace in locations where this is appropriate, is therefore paramount. Policy LP34 sets out how the borough will plan for this approach, in particular its protection and intensification-based criteria. The designation of the Battersea Design and Technology Quarter (BDTQ) within the Queenstown Road, Battersea Strategic Industrial Location (SIL) forms an important part of the borough's strategy, which also delivers on the Council's broader economic development strategy and the investment made within the wider area.

As set out in Written Statement MM1, although supported by a number of landowners and businesses within the area, it is noted that the Mayor of London contends that the borough's approach to Industrial land intensification within this is not in 'general conformity' with the London Plan. The Council continues to work with the GLA to address this issue and a Statement of Common Ground is due to be agreed. The Council's position on this matter is set out in detail in its response to GLA Representation comment ID number 637 within the Schedule of Regulation 19 consultation Reponses (WBC-007).

Policies LP38 (Affordable and Open Workspace) and LP39 (Local Employment and Training Opportunities):

LP38 'Affordable and Open Workspace' is in general conformity with London Plan Policy E3 (Affordable Workspace). The approach builds upon that within the existing and adopted Local Plan (Employment and Industry Document, 2018) and the Planning Obligations SPD (2020), which has been successful in securing affordable and managed workspace within the borough. The approach to 'managed workspace' has been refined and clarified, and is now set out in terms of 'open workspace'. This concept builds on, and is consistent with, evidence published by the GLA in the document 'Creating Open Workspaces' (SD-039), and this change was noted and supported by the Mayor of London.

The importance of securing affordable workspace as part of the Local Plan was identified within the Employment Land and Premises Study (ELPS) (SD-034), and the approach reflects the recommendation of that study that the Council should provide a range of affordable workspace options across the borough to cater for different types of businesses, and that the discounts at which the space is provided should be reflective of the area of the borough within which the workspace is located and the type of businesses which it is intended to cater for. The study included consideration of discounts required in neighbouring boroughs to ensure the approach is consistent across the wider functional market area.

Policy LP39 'Local Employment and Training Opportunities' also builds on the approach set out within the adopted Local Plan (Employment and Industry Document, 2018), and in particular Policy EI1.7. Further detail is comprehensively set out in the Planning Obligations SPD. The requirement for and delivery of employment and enterprise agreements has been successfully secured through legal agreements (Section 106 planning obligations), and their discharge is delivered by the Council's Workmatch service. This programme is operated by the Economic Development Office, with assistance provided by the Planning Department as

necessary. Within the submitted Local Plan, policy requirements are now set out within a distinct policy, helping to provide greater clarity around the approach and expectations.

Policy LP40 (Safeguarding Wharves):

LP40 'Safeguarding Wharves' is in general conformity with London Plan Policies SI15 'Water Transport' which requires boroughs to protect existing locations and to support development principles that facilitate an increase in the amount of freight transported on London's waterways. Note that the Mayor has 'concerns' with some of the wording of the safeguarded wharf site allocations – the Council's response is set out against comment ID 642 of the Schedule of Regulation 19 Consultation Reps (WBC-007). The policy approach also takes account of and is consistent with the Secretary of State's Safeguarding Directions for wharves identified in the Implementation Report - Safeguarded Wharves Review 2018-2019.

Policy LP36 (Railway Arches) - Does the policy provide certainty for short term vacancies and enclosed arches with regard to potential harm to existing biodiversity?

This issue was raised within representations made to the Council on the Publication Local Plan (Regulation 19) Version. The representations indicated general support for the approach set out within Policy LP36 (Railway Arches), subject to a number of 'minor modifications'. As set out in comment # 548 within Appendix 6: Responses to Local Plan Publication Consultation (SD-012), one such modification concerned the language of LP36. Part B, which outlines the Local Plan requirement that "where a proposal involves the use of open and vacant railway arches, evidence will need to be submitted which demonstrates that any existing biodiversity value will not be harmed by the use or that appropriate mitigation measures will be provided in line with Policy LP57 (Biodiversity)". The representation noted that the requirement that the existing biodiversity value of a railway arch is unharmed should realistically only be relevant to open and vacant railway arches, on the basis that 'enclosed' or 'built out' railway arches are not expected to have any biodiversity value (as would be the case with any wider enclosed commercial buildings). It further noted that railway arches are often only vacant for a limited period of time in-between a change of use in occupiers which should not have any implications on their biodiversity value. The representation agreed with the principle that where open railway arches are vacant for an extended period of time (i.e. 24-36 months or longer), it should be ensured that any biodiversity value in such arches remained unharmed. The representation proposed an amendment to the policy wording to ensure that it is 'sound, clear and provides a reasonable policy framework'.

As set out against comment # 548 within Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council's Responses (WBC-006/7), the LPA agreed that the policy as worded could result in the assessment of biodiversity value and mitigation of harm to it being required for short-term vacancies (a function of a normally operating market) and for enclosed arches, which is not its intention. As such the Council has suggested a proposed Main Modification to Policy LP36 Part B for the sake of clarity as set at Reference PPMM/103 in Schedule of Proposed Main Modifications Suggested by the Council (WBC-010).

Policy LP38 (Affordable and Open Workspace) - Does the policy provide clarity regarding the period for which such workspace should be provided?

This issue was raised in representations made to the Council on the Publication Local Plan (Regulation 19) Version. In the context of requirements, within Policy LP38, that affordable and/or open workspace provision is made 'in perpetuity', representations set out that it was considered unreasonable to apply a period of perpetuity without including a mechanism for release from this restriction given potential scenarios whereby the developer could be prejudiced through the application of this policy in the long term, such as during a recession or if the existing business was poorly managed (see comments # 523 and # 576 within Appendix 6: Responses to Local Plan Publication Consultation (SD-012)). As part of the proposed modifications included within the representation, it is suggested that 'in perpetuity' is replaced with the wording 'for a period of 30 years unless otherwise agreed'.

As set out against comments # 523 and 576 within Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council's Responses (WBC-006/7), the LPA agreed that it would add clarity to the Local Plan to set a timeframe for the provision of the period for which the affordable workspace should be provided, as this help to clarify in instances where a financial contribution is made. A term of thirty years, as proposed in the representation, is considered appropriate. The Council has therefore suggested proposed Main Modifications to Policy LP38 (Affordable and Open Workspace) and the supporting text to Policy LP38 for the sake of clarity. These are set out under References PPMM/104, PPMM/105, PPMM/106 and PPMM/107 in the Schedule of Proposed Main Modifications Suggested by the Council (WBC-010).

Do Policies LP33 – LP40 provide clear direction as to how a decision maker should react to a development proposal?

The Council considers that Policies LP33 to LP40 have been drafted in accordance with paragraph 16 of the NPPF, which requires that they are (as per part d), ‘clearly written and unambiguous’, and drafted in such a manner that it is ‘evident how a decision maker should react to development proposals’. Policies are positively worded, and – where appropriate – set out the requirements for decision makers using a criteria-based approach (see, for example, LP47.A, B, and C) or clearly stipulate thresholds, justified within the supporting text, at which policy requirements are applied (see, for example, the requirement for the provision of open workspace to be a minimum of 400 sqm in LP38.A.2.a, the justification for which is explained within paragraph 18.67).

In addition to being clearly structured and worded, the policies have been drafted such that they are clearly linked with the relevant environmental, social and economic objectives of the Local Plan, set out in Chapter 2. These objectives, in turn, contribute to the achievement of the Local Plan’s vision and which form the basis of its spatial strategy. The Council’s own assessment of the clarity and intent of the policies is set out within the PAS Soundness Self-Assessment Checklist (SD-015), with respect to Q44. ‘Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?’

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, significant changes were made to policies LP33 to LP40, a number of these expressly to address clarity. The Council’s detailed responses and the outcome of the representations submitted with respect to the Local Plan are set out in the Council’s Statement of Consultation Regulation 18, Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comments (SD-004), with those specific to policies LP33 to LP40 from pages 414 to 449.

The Publication (Regulation 19) Local Plan (SD-001) is the version that has been submitted to the Secretary of State. That notwithstanding, the Council has reviewed the representations received and have set out detailed comments within the Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council’s Responses (WBC-007 and WBC-008). The responses identify, where considered appropriate, a small number of specific changes to the wording of policies and supporting text for the sake of clarity. These are set out within the Schedules of Proposed Main and Additional

Modifications Suggested by the Council (WBC-010 References PPMM/097 - PPMM/108 and WBC-011 References PPMM/080 – PPMM/086), respectively.