

17 March 2023

Planning Policy
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir, Madam,

London Borough of Wandsworth Draft Local Plan: Proposed Main Modifications to the Local Plan

We write on behalf of our client, Schroder UK Real Estate Fund (“Schroders”), which is the owner of the Battersea Studios site. This response relates to the London Borough of Wandsworth (LBW) consultation on the Main Modifications to the Local Plan (“Main Modifications”). The consultation period ends on 17 March 2023.

On behalf of Schroders, we submitted representations in response to the Publication Version of the Local Plan (Regulation 19) consultation on 28 February 2022. We have monitored the draft Local Plan’s progress since, including the hearing sessions in November 2022, with a particular interest in any implications for the Battersea Studios site.

Background to Battersea Studios

Schroders acquired the Battersea Studios site in early 2014, which comprises a two-storey building containing office and flexible workspace units, known as Battersea Studios 1 (BS1), and a five-storey building, known as Battersea Studios 2 (BS2), which is also primarily occupied with office and flexible workspace. Together, these form a campus of office workspace, studios and workshops comprising a total of 9,970 sqm, largely occupied by small and medium sized enterprises.

In recent years Schroders has undertaken refurbishment works to provide modern workspace and communal spaces for meeting, collaborating and sharing ideas, as well as enhancing on-site facilities including space for cycle storage to help promote sustainable transport modes. With strong demand for the workspace already on site at Battersea Studios, Schroders is keen to continue to build on the economic success of Battersea Studios and make best use of the site to provide additional space and facilities for new and expanding businesses. An application for full planning permission (ref. 2021/0641) was submitted on 8 February 2021 for a third workspace building at Battersea Studios, referred to as Battersea Studios 3 (“BS3”). The application related to the erection of a 10-storey building in a currently redundant part of the site, with

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 1 New Street Square, London, EC4A 3HQ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NSE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms. Real Estate Services regulated by RICS.

9 storeys of office space on all floors above ground and light industrial at ground floor, as well as public realm improvements. The proposed development was designed in accordance with local planning policy which recognised the opportunity to maximise the economic potential of land in the borough to provide workspace alongside industrial uses, as is the case at Battersea Studios. This application was recommended for approval by planning officers in November 2021, but the application was withdrawn to allow further conversations regarding proposed planning conditions and S106 obligations. A revised planning application for BS3 was submitted on 24 February 2023.

Battersea Studios was the venue for the first stakeholder workshop relating to the preparation of the Battersea Design & Technology Quarter Economic Appraisal & Design Framework (BDTQ EADF), and was afforded a separate agenda item at the LBW BDTQ EADF Briefing on 30 September 2020, in part due to its role in meeting the EADF's aspirations and its exemplary status as a forthcoming application pursuant to the Framework. The proposals for intensification at Battersea Studios were initially put on hold whilst LBW prepared the BDTQ EADF.

Since publication of the EADF in February 2020, Battersea Studios has been located within the BDTQ boundary, with the EADF identifying the ***“creative workspace is limited in the area...with the exception of Battersea Studios”***, with the site therefore supporting one of the area's guiding principles to support enterprise and innovation. It also describes Battersea Studios as a ***“great success in terms of value and atmosphere”***, and as such promotes the need for it to continue to be developed to help meet the clear demand for creative businesses in the borough.

As part of discussions with LBW regarding the resubmission of the application for BS3, we learned that the proposed draft Main Modifications would include proposals to amend the site allocations comprising the BDTQ and subsequently remove Battersea Studios from the BDTQ.

On 19 December 2022 we wrote to the Programme Officer appointed to conduct the examination, Charlotte Glancy of Banks Solutions (please see letter at Appendix 1). In this we explained that we have, on behalf of Schroders, supported the inclusion of the Battersea Studios site within the BDTQ boundary and have in representations submitted with respect to the Draft Local Plan recognised and welcomed the weight given to the EADF's aspirations in emerging Local Plan policy. We expressed our concerns regarding the proposed modifications to amend the site allocations comprising the BDTQ and the removal of Battersea Studios from the BDTQ, and disappointment that we and the client had not been invited to discussions as soon as such significant changes were contemplated. We suggested a meeting in January 2023 with the Inspectors, LBW, the GLA and Schroders, but such a meeting was not offered.

Previous Response to Regulation 19 Draft Local Plan

Schroders submitted formal representations in response to the LBW Pre-Publication (Regulation 19) Draft Local Plan on 28 February 2022. As part of the previous consultation, Schroders proposed a series of changes, including the below:

- Amending the colouring on Map 23.13 Tall Building Zone TB-B3a-02 to confirm support for taller buildings in the zone;
- Making clearer the expectations for building frontages in the BDTQ area;
- Adding the need to assess parking requirements and the siting of larger businesses in town centres on a case-by-case basis; and,

- Amending capped rent reduction rates to more accurately reflect varied rent levels across the VNEB OA.

When commenting on the above, the proposal to remove Battersea Studios from the BDTQ, and instead locate it within its own site allocation outside of the BDTQ, had not been mooted. Schroders has reviewed the Schedule of Main Modifications as published by LBW and makes the following substantial objections.

Schedule of Main Modifications Response

Battersea Design & Technology Quarter

Area Strategy for Nine Elms / PM3 Nine Elms / Battersea Design and Technology Quarter / NE8 Battersea Studios, SW8 / Maps 3.2, 5.1, 5.2, 5.4, 5.7 (inc. Main Modifications Nos. MM2, MM34, MM36, MM38, MM41, MM43, MM59 – MM62, MM64, MM66, MM69, MM71, MM201 – MM202, MM206, and MM209)

The SDS1 Spatial Development Strategy 2023 – 2038, Policy PM3 Nine Elms, Map 5.7 Battersea Design and Technology Quarter, and the creation of *Site Allocation NE8 Battersea Studios, SW8*, are all proposed by the Main Modifications to be amended to reflect the removal of the Battersea Studios site from the BDTQ cluster. The reason given in the consultation document is that this is at the GLA's request and to ensure "general conformity with the London Plan policies E4 and E7".

As noted previously, and with related reference given in the BDTQ document itself, the overarching aspirations of the BDTQ EADF align with the land uses and business activities that are undertaken at Battersea Studios. To remove the site from the BDTQ therefore appears misguided and in direct conflict with the site's role in introducing creative industries into the Queenstown Road area. The BDTQ EADF states that it aspires to deliver a distinct creative and economic cluster, with a focus on the interaction between technology and design, and by capitalising on existing institutional and economic assets in this area.

The proposed third workspace building and longer-term indicative masterplan at Battersea Studios has been defined by three of the main drivers noted in the BDTQ EADF, being creative employment, industry and 'hub' spaces. The BDTQ EADF also recognises the opportunity at Battersea Studios for a phased approach for the longer-term redevelopment and intensification of the site, including a taller building in its north-eastern corner, as has now been proposed in a new application for full planning permission submitted to LBW in February 2023.

The GLA Stage 1 report (04/05/2021) associated with the 2021 application for BS3 explains the relevance and compliance of the proposals with the BDTQ EADF, where it recognises the need for workshops and studio uses like those that had been proposed, and have now been proposed in the resubmitted application. The Stage 1 report references London Plan Policy E4, and notes that the potential conflicts between uses within the SIL were appropriately resolved, and that when having "regard to the strategic and local policy context..., the proposed employment uses are supported on this underutilised site within the Queenstown Road SIL and Vauxhall Nine Elms Battersea OA". The GLA's strong support for the employment space intensification within the Queenstown Road SIL was referenced in the LBW Committee Report dated 23 November 2021.

It is therefore unclear why the removal of Battersea Studios from the BDTQ on grounds of accordance with London Plan policies has been proposed.

The GLA's comments to the EIP state how the draft LBW Local Plan (Policy LP34) makes an exception for the BDTQ in allowing the upper floors to be used for offices and research and development uses. However, it

also notes how it considers that the introduction of these uses is likely to “weaken the integrity and operational function of the SIL designation and further restrict opportunities to meet future industrial needs”. In seeking to address this risk, the GLA comments and Main Modifications propose to redraw the BDTQ boundary to ‘safeguard heavy industrial uses’, including removing ‘the Tarmac Site’, ‘Bidfoods Site’ and ‘Abellio Bus Garage Facility’ from the BDTQ. However, the GLA does not list the proposed removal of the Battersea Studios site from the BDTQ as necessary on these grounds. Page 12 of the ‘Statement of Common Ground Between London Borough of Wandsworth and The Mayor of London / Greater London Authority’ (08 November 2022) proposes the following as a modification:

1. *“Redraw BDTQ boundaries to exclude the heavy industrial uses (see Figure 1 in the appendix), especially to safeguard the following uses (see Figure 2 in the appendix):*
 - a) *Self store Ingate Place*
 - b) *the Tarmac site (B2) in Silverthorne Road*
 - c) *the Bidfoods site (B8) in Silverthorne Road*
 - d) *the Abellio bus garage facility (SG) in Silverthorne Road*

The Mayor strongly supports the need to retain the Queenstown Road Battersea SIL location to facilitate sustainable servicing of the CAZ and retain capacity within proximity to the CAZ.

2. *Re-designate SIL to LSIA in the redrawn BDTQ boundary (see Figure 1 in the appendix). The designation of Summerstown LSIA to SIL in the local plan may create a balance to the supply of SIL in the borough, while recognising that this LSIA only has some potential for industrial intensification.”*

The changes proposed by the Main Modifications would also see the removal of the Battersea Studios site from the BDTQ, the redesignation of the remaining parts of the cluster as a Locally Significant Industrial Area (LSIA (equivalent to LSIS)), and would create the ‘Battersea Design and Technology Quarter LSIA’.

Schroders makes the following comments in response to this outcome.

The case for removing Battersea Studios from the BDTQ is not justified by the need to safeguard the heavy industrial uses surrounding the Battersea Studios site. The Battersea Studios site does not provide accommodation for these uses, and it has been widely acknowledged to have been the first site in the area to accommodate the types of creative uses that are promoted in the BDTQ. The existing employment space at Battersea Studios, and the submitted proposals for BS3, are not comparable to the surrounding heavy industrial uses listed for removal from the BDTQ.

For this reason, Schroders strongly proposes that the area shaded as BDTQ should be expanded to include, at the very least, Battersea Studios. It also believes that there is a strong justification to include the employment land along the frontage of Silverthorne Road in the BDTQ, to demonstrate that this land is suitable for uses that are compatible with the aims of the BDTQ in the event that they become available for development. These plots would remain protected as SIL, but their inclusion in the BDTQ would also acknowledge the potential for their use for more compatible employment uses in the transition to the neighbouring areas.

In making this change, the Local Plan would be treating the BDTQ as a ‘Creative Cluster’, as defined in Policy PM3 and Map 5.1.

Alongside this change, Schroders proposes that the new LSIA to the north of Battersea Studios, which comprises the Havelock Terrace and Ingate Place sites, is instead titled the 'Havelock Terrace & Ingate Place LSIA'. This will allow for the new LSIA to still be differentiated from the existing SIL and new NE8 Battersea Studios site allocation, whilst maintaining that the ambitions of the BDTQ apply to a wider area.

We consider that the expansion of the BDTQ and changed name of the LSIA would require a simple set of changes to the Local Plan. The references to the aims of the BDTQ (such as in Policy PM3) could remain as drafted. All references to the BDTQ LSIA could be changed to Havelock Terrace & Ingate Place LSIA.

Use Class B8, Storage or Distribution

PM3 Nine Elms, NE8 Battersea Studios, LP34 Managing Land for Industry & Distribution (inc. Main Modifications Nos. MM38, MM71, MM204, MM206, MM211)

It is noted that in Policies PM3 Nine Elms, NE8 Battersea Studios and LP34 'Managing Land for Industry & Distribution' that there is a new preference for Use Class B8 'Storage or Distribution' when providing replacement or additional industrial space. At Battersea Studios, Use Class B8 'Storage or Distribution' would not be appropriate for the ground floor in current or future proposals. The 'light industrial' designation included in adopted and emerging policy to date, including Policy LP34 'Managing Land for Industry & Distribution', is far more appropriate and akin to current site uses and tenants. It is felt that the 'preference' for B8 uses should not be included in the NE8 Battersea Studios Site Allocation, nor should it be so explicit elsewhere, with instead recognition and greater flexibility given for when this type of industrial space is not appropriate.

New NE8 Battersea Studios Site Allocation

NE8 Battersea Studios, LP34 Managing Land for Industry & Distribution (inc. Main Modifications Nos. MM71, MM208)

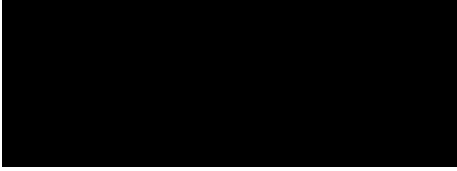
Schroders supports the allocation of Battersea Studios as site NE8, but we suggest some minor proposals to the allocation in Appendix 2 of this letter, reflecting our other comments, particularly that to acknowledge the site's position in the BDTQ.

Conclusion

To conclude, Schroders continues to have major concerns regarding the Main Modifications and strongly object to the proposed removal of the Battersea Studios site from the Battersea Design and Technology Quarter. Schroders suggests that an urgent meeting is held with the Inspectors, LBW, the GLA and Schroders to discuss the matter.

Schroders requests to be informed on the progress of the document. In the interim, if you have any queries, please do not hesitate to contact Phil Wright (phiwright@deloitte.co.uk / +44 20 7303 6106).

Yours sincerely



Jeremy Castle
For Deloitte LLP

Appendix 1 – Letter to Programme Officer, Charlotte Glancy of Banks Solutions, Dated 19 December 2022

19 December 2022

Charlotte Glancy
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Dear Charlotte,

London Borough of Wandsworth – Draft Local Plan Examination & Modifications

I write in relation to the London Borough of Wandsworth (LBW) Draft Local Plan and its examination stage. We are the retained planning advisor for Schroders Plc with regard to their Battersea Studios site within the borough. Battersea Studios currently comprises two buildings which contain office and flexible workspace, including managed workspace and units of varying sizes to meet the needs of a number of small businesses. We are preparing a forthcoming planning application for a third workspace building at the site to deliver a mix of commercial floorspace akin to that already on site.

The draft Local Plan in paragraph 18.32 notes the aspiration to build on the existing creative and design economy within the BDTQ by bringing new SME jobs to the area and promoting the intensification of the existing industrial activities.

The Battersea Design and Technology Quarter (BDTQ) Economic Appraisal & Design Framework (EADF) (2020, by We Made That et al) identifies Battersea Studios as the only current provider of creative workspace in the BDTQ, supporting one of the area's guiding principles to support enterprise and innovation. It also describes Battersea Studios as a "great success in terms of value and atmosphere", and as such promotes the need for it to continue to be developed to help meet the clear demand for creative businesses in the borough.

As such, Battersea Studios is recognised as a key contributor and opportunity for delivering the BDTQ as a creative and economic cluster.

To date, and on behalf of Schroders, we have supported the inclusion of the Battersea Studios site within the BDTQ boundary and have in representations submitted with respect to the Draft Local Plan recognised and welcomed the weight given to the EADF's aspirations in emerging Local Plan policy.

We have in recent days been updated by LBW about discussions at the Examination and the subsequently proposed modifications to the draft Local Plan. . We have expressed our serious concerns to Adam

Hutchings of LBW regarding the proposed modifications to amend the site allocations comprising the BDTQ and the removal of Battersea Studios from the BDTQ.

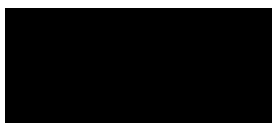
Whilst we recognise the steps taken to replicate elements of the previous draft NE8 site allocation for Battersea Studios in the proposed modifications, our client is very disappointed to not have been invited to partake in Examination discussions as soon as such a significant change was contemplated.

Therefore, we suggest that an urgent meeting is convened in early January 2023 with the Inspectors, LBW, the GLA and Schroders to consider the matter afresh.

As currently proposed, Schroders will strongly object to the proposed modifications to remove Battersea Studios from the BDTQ. However, we would prefer to engage with stakeholders before the modifications are published for consultation.

Please can you inform the Inspectors of this situation and advise us if they agree that a further meeting should take place.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Jeremy Castle
For Deloitte LLP

Appendix 2 - NE8 Battersea Studios Site Allocation (Proposed Amendments)

NE8 Battersea Studios, SW8

Site Description:

The site is located in the Queenstown Road Strategic Industrial Location and is surrounded by industrial buildings including a bus depot to the east, Stewarts Land Good Depot to the south, and a Bidfood distribution centre to the west. The northwest boundary is defined by Stewarts Lane which serves the nearby cement works, bus depot and other industrial uses. ***The site sits within the Battersea Design & Technology Quarter creative cluster.***

Site Allocation: A mix of workshops and studio uses, office space for SMEs, industrial uses including yard space and amenity space.

Development Considerations

Uses - Industrial uses must be provided within the ground floor units which should be designed to accommodate a range of industrial occupiers with preference given to ***Use Class E (Light Industrial) or B8*** uses to contribute to the 30,500 sqm demand for B8 uses as per the ELPS 2020. Office and research and development accommodation to meet the needs of SMEs should be provided on the upper floors.

Open Space – ***Where possible***, soft and hard landscaping features should be incorporated into the Silverthorne Road access frontage.

Access - Create clear servicing routes and access points to buildings, this will help reduce potential conflict between vehicles, pedestrians and cyclists at the junction with Silverthorne Road.

Public Transport - Development will be expected to contribute to any proposals to improve bus journey times along Queenstown Road.

Active Travel - Contributions to upgrade pedestrian routes to/from Battersea Park Station and Queenstown Road Station and improve accessibility to the new Northern Line station at Battersea Power Station, will be required.

Built Form –

- Development must avoid material harm to the amenity of neighbouring occupiers or the operations of neighbouring uses.
- where possible, blocks should be structured around working yards and amenity spaces with active and positive frontages to those spaces.
- A high-quality public realm is required in accordance with the Nine Elms Public Realm Design Guide and the BDTQ EADF.
- Architectural expression should denote the use of the site as a place for production, creativity and innovation.

Building heights: In accordance with the tall building maps in Appendix 2, part of the cluster is located in tall building zone TB-B3a-02. The maximum appropriate height range for the zone is 7 to 11 storeys, and the appropriate height range for the cluster should be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and should be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).’