

# Wandsworth Local Plan



## Integrated Impact Assessment

For Employment  
and Industry  
Document  
proposed  
submission  
version

March 2017



## **Integrated Impact Assessment (IIA)**

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## 1 Non-technical summary and next steps

### Introduction and purpose of an Integrated Impact Assessment

**1.1** This Integrated Impact Assessment (IIA) report fulfils the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and also includes an Equalities Impact Assessment (EIA) and Health Impact Assessment (HIA). The aim of this integrated approach is to avoid the need to separately report on each of these assessments, reducing duplication of the assessment work and providing a more straightforward document. The IIA has been prepared to accompany and inform the partial review of the Local Plan relating to employment and industry policies.

**1.2** The purpose of Sustainability Appraisal is to assess the potential impacts of a plan on the social, environmental and economic characteristics of an area and propose measures to change policies or site allocations, so that the positive effects on these characteristics are maximised and the negative effects are minimised. SA is an ongoing process required at various stages in the development of Local Plan documents.

**1.3** SA of Local Plans is required under section 19 of the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (March 2012) also requires SA of Local Plans. In relation to local planning in England, it is accepted practice to integrate the requirements of SA and Strategic Environmental Assessment (SEA) in to a single assessment process, as set out in Planning Practice Guidance (updated 2014).

**1.4** The SA must also include the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations<sup>0</sup>); this report therefore incorporates a Strategic Environmental Assessment (SEA). The SEA Regulations aim to achieve a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development. The SEA Regulations require the identification, description and evaluation of the likely significant effects on the environment of a plan and "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" (Reg 12 (1(b))).

**1.5** The IIA also incorporates Health Impact Assessment (HIA). This is not a statutory requirement but is good practice.

**1.6** Because of the limited scope of the review and the location of the related site allocations being considered, it is not necessary to undertake a full screening of potential impacts on habitats, referred to as a Habitats Regulations Assessment (HRA).

**1.7** Planning Practice Guidance (PPG) sets out the stages of the Sustainability Appraisal process, which is detailed in section 3 of this report. The first stage (Stage A) is to prepare a new Scoping Report for the borough and this was prepared by CAG consultants and finalised

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These regulations transpose European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive).

in October 2016 following consultation with key stakeholders (Environment Agency, Natural England, Historic England, Wandsworth Public Health), adjoining boroughs, and relevant Council officers (including those responsible for equalities), for a 5 week period from 15th August to 16th September 2016, in order to agree the scope of an Integrated Impact Assessment (IIA). The Scoping Report provides updated baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline position which would occur without the plan, reviews relevant plan policies and programmes and sets out a methodology and framework for the assessment of the Local Plan reviews and their alternatives at later stages of the Plan review process. The key issues identified through the review of baseline data and the objectives of relevant other policies, plans and programmes (PPP) are set out alongside the proposed IIA Framework. This contains the IIA objectives which will be used to test the performance of the Wandsworth Local Plan Partial Review and Full Review with regards to environmental, economic and social effects (including health and equalities).

#### List of IIA Objectives

- IIA1: Avoid loss of designated ecological sites, priority habitats and species.
- IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough.
- IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains.
- IIA4: Enhance the benefits to all from biodiversity and ecosystem services and establish and retain inter-connected multi-functional green infrastructure.
- IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy.
- IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.
- IIA7: Maintain and improve air quality.
- IIA8: Promote renewable and low carbon energy generation.
- IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS.
- IIA10: Provide more housing opportunities for Wandsworth residents and workers.
- IIA11: Ensure people have access to essential community services and facilities, including open space.
- IIA12: Reduce poverty, social exclusion and health inequalities.
- IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief.
- IIA14: Address Council aspirations within priority neighbourhoods.
- IIA15: Protect and improve public health.
- IIA16: Reduce the impact of noise.
- IIA17: Encourage the growth of sustainable transport.
- IIA18: Reduce the need to travel.
- IIA19: Provide employment space to meet the borough's needs.
- IIA20: Ensure people have access to suitable employment opportunities.

**1.8** This IIA reports on the outcome of Stage B of the Appraisal Process and aims to inform the development and refining of policy alternatives and an assessment of their effects on the IIA Objectives identified above.

### **The Wandsworth Local Plan and the Employment and Industrial land review**

**1.9** The employment and industry Local Plan review is a partial review of the Council's Local Plan documents which comprise the Core Strategy, the Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD) and which were adopted in March 2016. The review is required as the evidence base justifying the existing employment and industry policies is out-of-date (produced in 2010) and needs to better reflect the current economic climate, national planning policy - the National Planning Policy Framework (NPPF) - and changes to the London Plan. The main issues the review considers are:

- Industrial Land – what the demand for industrial, storage and distribution land will be in the future, whether any of the protected industrial sites could be released for other sorts of uses, and what those uses could be;
- Offices and other employment uses – where they should be encouraged and protected, and what sort of employment workplaces are needed to support the economy of the Borough.

**1.10** The review will also take into account some related issues, such as waste sites and the needs for affordable and creative workspaces. The adopted document will set out the policies and site allocations relating to planning for employment and industry in the borough of Wandsworth. The outcome of the review will result in a new Development Plan Document, which forms part of Wandsworth's Local Plan alongside the Core Strategy, Development Management Policies Document (DMPD) and Site Specific Allocations Document (SSAD) which will guide development in the borough over the next 15 years and will be used to inform decisions on planning applications.

### **Timetable**

**1.11** The timeframe and key stages for the production of the Local Plan Employment and Industry Document is set out below. This IIA relates to the Regulation 18 Policy Options consultation version of the document and has informed the development of the Regulation 19 submission version of the document.

| STAGE                         | EXERCISE                                      | TIMEFRAME           |
|-------------------------------|---|---------------------|
| <b>Stage 1</b><br>Preparation | Regulation 18 preparation stage consultation  | Dec 2015 – Jan 2016 |
|                               | Employment Land and Premises Study            | Apr – Jul 2016      |
|                               | Call for sites                                | Jun – Sep 2016      |
|                               | Policy Options consultation                   | Oct 2016            |
| <b>Stage 2</b><br>Publication | Publish submission version                    | Mar 2017            |
|                               | Regulation 19 submission version consultation | Mar – Apr 2017      |
| <b>Stage 3</b><br>Examination | Submission to Secretary of State              | Oct 2017            |
|                               | Examination                                   | Dec 2017 – Apr 2018 |
| <b>Stage 4</b><br>Adoption    | Adoption                                      | Jul 2018/Dec 201    |

**1.12** This IIA report focusses on Stage B of the SA Process: Developing and refining options and assessing effects. This involves the following tasks which are documented in more detail in the main body of this report, apart from task B2 which is considered unnecessary given the limited nature of the Employment and Industrial land review which does not propose additional sites not already used for employment or industrial purposes:

B1: Testing the plan objectives against the IIA assessment framework

B2: Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)

B3: Predicting the effects of the plan and its alternatives

B4: Evaluating the effects of the plan and its alternatives

B5: Considering ways of mitigating adverse effects and maximising beneficial effects

B6: Proposing measures to monitor significant effects of implementing local plans

## Methodology

**1.13** Consultation of broad policy issues was carried out between December 2015 to January 2016 and responses collated to refine these into a set of policies and policy options which are assessed in appendix 1, and the main conclusions are described in section 6 of the IIA report (Stages B3 and B4 of the IIA process). Policy options are evaluated in the appraisal matrix tables in this IA report which record the predicted impacts of each policy in addition to the 'no plan' and 'status quo' options. The impacts are recorded against each IIA

objective as either: strongly positive; positive; neutral/no impact; negative or strongly negative. Each policy option has been colour-coded (green, amber or red) to identify the overall outcome as mainly positive neutral or negative. Discussion in section 6 of this IIA describes short, medium and long term impacts where relevant, and any impacts predicted to occur beyond the borough boundary have been documented.

## **Appraisal and key findings**

**1.14** The overall outcomes of the policy options appraisal (contained in section 6 and appendix 1 of this report) have been used to inform the Proposed Submission version Employment and Industry Local Plan Document, alongside the outcome of public consultation on the policy options and other relevant evidence. In conclusion there is no conflict between the IIA appraisal result and the preferred policies taken forward into the Proposed Submission version Employment and Industry Local Plan Document. The appraisal tables show that many IIA objectives are not impacted at all by the policy options, as can be reasonably expected from the limited scope of the local Plan review which focusses only on employment and industrial land. Similarly, the limited scope of the review means that the full outcome of impacts resulting from the inter-relationship between all the remaining adopted Local Plan policies will not be able to be fully identified until the Full Review of the Local Plan takes place and which will be reported in a new IIA report when all the local plan/site allocation changes are proposed.

## **Mitigation and monitoring proposals**

**1.15** This IIA Report also includes stages B5: Considering ways of mitigating adverse effects and maximising beneficial effects and B6: Proposing measures to monitor significant effects of implementing local plans are set out in section 7 of this report. Briefly, the use of planning conditions and the detailed policy requirements of the Council's other adopted policies are examples of measures to control adverse impacts such as noise and securing low carbon emissions in new developments. Beneficial effects, in other words improving the outcome of some of the SA objectives, include employment and training opportunities for local residents and affordable housing which can be secured thorough planning obligations; the Council has a Planning Obligations SPD to assist in the implementation of this measure. Proposals for monitoring have been described and any new monitoring indicator identified. The limited scope of this partial Local Plan review and data gaps in some topic areas means that there has been no need to change most of the Local Plan monitoring indicators resulting from this review. Updates to the monitoring framework at this stage are limited to monitoring IIA objectives IIA19 and IIA20.

## **Next steps**

**1.16** The Proposed Submission policy document and the IIA will be subject to consultation in March to April 2017. Details of the consultation and how people can respond will be publicised on the Council's website and by letter and email to a broad spectrum of consultees. The Scoping Report and responses will also be made available for information purposes on the Council's website. It is intended to submit the proposed submission consultation document



for public examination in October 2017. The responses to the consultation and any new relevant evidence will be taken into account, and there may be a requirement for the Council to propose modifications to the Employment and Industry Document; if this is the case, the proposed modifications will be informed by the findings of this IIA and considered against the IIA objectives. It may be appropriate at that stage to produce a statement updating the IIA.

## 2 Introduction and background to the Early Review of the Local Plan

### Introduction and purpose of the Integrated Impact Assessment

**2.1** Government legislation requires the Council to carry out a Sustainability Appraisal (SA) of all the documents which together make up the Local Plan. The purpose of the SA is to assess the potential impacts of various plans and programmes on the social, environmental and economic characteristics of an area and propose measures to change policy or mitigate any conflicting effects identified from plan alternatives. The main role of the SA is to ensure that the planning policies being developed by the Council achieve the optimal balance of positive social, environmental and economic outcomes for Wandsworth. SA is not an exact science. It involves a balance of value judgements about how the environment should look and function. While some people may place a high value on the quality of the environment, others may strive for a healthy economy or a strong sense of community. It is the Council's task to find a balance between these sometimes conflicting goals. SA is an ongoing process required at various stages of the development of Local Plan documents. SA of the adopted Local Plan - comprising the Core Strategy, the Development Management Policies Document (DMPD) and the Site Specific Allocation Document (SSAD) - was undertaken at all stages of policy development, with the final SA of the post examination changes being carried out as recently as 2016. The Local Plan Employment and Industry Review is limited in scope to the detailed policies and a limited number of site allocations in this policy area, and does not change any of the existing Local Plan objectives; this appraisal is therefore proportionally limited in scope.

**2.2** This report is an Integrated Impact Assessment (IIA) report which appraises the significant effects of the Wandsworth Local Plan Partial Review and which incorporates the following types of assessments: a Strategic Environmental Assessment (SEA); a Sustainability Appraisal (SA); a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA).

### Strategic Environmental Assessment (SEA)

**2.3** The Council is also required under European Directive to undertake a Strategic Environmental Assessment (SEA) of new plans. Government guidance considers it appropriate to combine both assessments through a single approach. The Council's report therefore integrates both SA and SEA in line with the requirements of the SEA Regulations which apply to a range of English plans and programmes, including Local Plans. These regulations transpose European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive). The SEA Regulations aim to achieve a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development. The SEA Regulations require the identification, description and evaluation of the likely significant effects on the environment of a plan and 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or

programme' (Reg 12 (1(b))). These requirements have been met in that an updated Scoping Report has been produced (October 2016) which updates the key baseline information, reviewed the relevant plans and programmes, and from which an updated set of sustainability objectives have been identified. In addition, by testing each of the proposed policy options against the revised sustainability objectives identified in this report, this IIA has assessed and reported on the likely significant effects of each of the plan options. As such the assessment findings identify those options which optimise the opportunities for improving social, environmental and economic conditions by implementing the plan.

### **Health Impact Assessment (HIA)**

**2.4** HIA is a procedure by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population. Whilst there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIAs at a policy level in a variety of policy documents and they are increasingly being seen as best practice. It is common within the London Boroughs to integrate HIA and EqIA into an integrated assessment which meets the legal requirements of an SEA and the requirements of SA. Human health is a topic specifically required for consideration by the SEA Regulations and equality of opportunity and social inclusion impacts are commonly included as a part of SA/SEA. Planning Practice Guidance states that 'Local planning authorities should ensure that health & wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making.' It also states that 'a health impact assessment may be a useful tool to use where there are expected to be significant impacts.' Furthermore, London Plan Policy 3.2C states that 'The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments'. The emerging Local Plan review will include allocating sites for development and therefore it is considered to be good practice for health impacts to be considered as part of this process. This is particularly important as the Health and Social Care Act 2012 transferred statutory responsibility for public health to local authorities. The Local Plan will ensure that public health is fully integrated with land use planning, such as in relation to the impacts of development on health and optimising opportunities for land use planning to enable people to lead healthy lifestyles. Wandsworth Public Health has therefore been included as a key consultee for the IIA.

### **Equalities Impact Assessment (EqIA)**

**2.5** An EqIA is a way of measuring the potential impact (positive, negative or neutral) that a policy, function or service may have on different groups protected by equalities legislation, notably the Equalities Act 2010. This Act places a general duty on the Council as a public body to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics. The equality duty came into force in April 2011 and covers the following Personal Protected Characteristics:

- age;
- disability;
- gender (male/female);
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief; and
- sexual orientation.

**2.6** EqIA is therefore an essential tool for demonstrating that the Council has complied with the law by shaping the way decisions are taken and thereby improving outcomes. It enables a good understanding of different needs and the differential impacts that the policies may have on different groups.

### **Habitats Regulation Assessment**

**2.7** In the UK the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010. These require an assessment of any plans which are likely to have a significant effect on any European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulation Assessment (HRA). This requirement includes strategic plans with an impact on land use. As part of the consultation on the Scoping Report, and during the preparation of this IIA report, Natural England was consulted to advise on the need for HRA screening of the policy options. This exercise is required to determine if the emerging planning policy options (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a European site, in terms of its conservation objectives and qualifying interests. The limited nature of the review and the location of the related site allocations has not triggered a requirement for screening to take place to date.

### **Background to the Employment and Industrial Land Review**

**2.8** The Wandsworth Local Plan currently consists of three development plan documents all adopted in March 2016: The Core Strategy, the Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD) and supplemented by the Policies Map. Although the Local Plan has been recently adopted, the evidence base supporting the employment and industrial land policies dates from 2010 and, along with updated London Plan policies, the Council has committed to a partial review of these policy areas. As such, Wandsworth is producing a new Local Plan document covering employment premises and industrial land which will form part of the Local Plan for Wandsworth and which will set out relevant planning policies and allocating sites. It will partly replace the existing Local Plan Documents as follows:

Core Strategy: Policies PL6 (Meeting the needs of the local economy) and PL7 (Land for industry and waste).

DMPD: Policies DMTS14 (Offices); DMI1 (Strategic Industrial Locations - SILs - and Locally Significant Industrial Areas - LSIAs); DMI2 (Mixed Use Former Industrial Employment Areas - MUFIEAs); DMI3 (Thames Policy Area); DMI4 (Flexible employment floorspace); DMI5 (Allocated sites for waste management facilities); DMI6 (Development of waste management facilities on unallocated sites); and DMI7 (Development criteria for waste sites).

**2.9** This IIA report appraises policy options which have been closely informed by the policy options document, which underwent consultation between 7th October and 4th November 2016. Some of the options were not explicitly suggested in the policy options consultation, though they were implicitly covered. The options were intended to be broad-based and did not go into detail regarding area spatial strategies or, in the main, site allocations. However where site allocations were considered to be significant options, these have been appraised as part of the Policy Options. A detailed discussion on the Wandsworth Local Plan Employment and Industry review is contained in section 4 of this report.

**2.10** The end result of the Local Plan review will be the production of a new Local Plan document, covering employment and industrial land and premises and containing revised relevant policies and site allocations. This will sit alongside the existing Local Plan documents, replacing the current employment and industry sections.

### 3 Scoping report update

**3.1** A Scoping Report was commissioned from CAG consultants in order to determine the scope of the Integrated Impact Assessment of the Wandsworth Local Plan, and to inform both the Industry and Employment Review and the full review. This was completed in October 2016 and will be made available for reference during consultation on this IIA report. The previous Scoping Report was produced in 2005.

**3.2** The Scoping Report is stage A of the IIA process (Scoping), as shown in the table below, and fulfils the requirements to:

- identify environmental, social and economic issues and objectives contained in other strategies, plans and programmes that are relevant to the Local Plan area;
- provide baseline information on the environmental, social and economic characteristics of the area;
- outline an appropriate framework for carrying out the IIA, including objectives and indicators, against which the effect of the plan options and policies will be appraised, mitigated and monitored; and
- meet the requirements of the various assessments outlined in section 1.2 above.

**3.3** The requirements of the SEA Regulations with regards to Scoping are as follows:

- “when deciding on the scope and level of detail of the information that must be included in the [environmental] report, the responsible authority shall consult the consultation bodies.” (Part 3, Paragraph 5); and
- “where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority’s invitation to engage in the consultation.” (Part 3, Paragraph 6)

**3.4** These requirements were met through the consultation on this report. Best practice at the scoping stage suggest that the report provides reasons for eliminating issues from further consideration, and provides a methodology to focus the appraisal on significant issues. This has been addressed through the identification of sustainability issues.

## The IIA Process - Stages and Tasks

|  |   |
|--|---|
| <b>Local Plan</b>  | <b>IIA STAGES AND TASKS</b>   |
| <b>Stage 1</b><br><b>Pre-Production and Evidence Gathering</b> | <p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives<br/>                     A2: Collecting baseline information<br/>                     A3: Identifying sustainability issues and problems<br/>                     A4: Developing the IIA Assessment framework<br/>                     A5: Consulting on the scope of the IIA</p>   |
| <b>Local Plan</b>  | <b>IIA STAGES AND TASKS</b>   |
| <b>Stage 2</b><br><b>Production</b>                            | <p>Stage B: Developing and refining options and assessing effects</p> <p>B1: Testing the plan objectives against the IIA assessment framework<br/>                     B2: Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)<br/>                     B3: Predicting the effects of the plan and its alternatives<br/>                     B4: Evaluating the effects of the plan and its alternatives<br/>                     B5: Considering ways of mitigating adverse effects and maximising beneficial effects<br/>                     B6: Proposing measures to monitor significant effects of implementing local plans</p> |
|  | <p>Stage C: Preparing the formal IIA Report</p> <p>C1: Preparing the formal IIA Report</p>  |
|  | <p>Stage D: Consulting on the preferred options of the local plan and IIA Report</p> <p>D1: Public participation on the preferred options of the local plan and the IIA Report<br/>                     D2 (i): Appraising significant changes</p>  |
| <b>Local Plan</b>  | <b>IIA STAGES AND TASKS</b>   |
| <b>Stage 3</b><br><b>Examination</b>                           | D2 (ii): Appraising significant changes resulting from representations  |
| <b>Local Plan</b>  | <b>IIA STAGES AND TASKS</b>   |
| <b>Stage 4</b><br><b>Adoption and monitoring</b>               | <p>D3: Making decisions and providing information</p> <p>Stage E: Monitoring the significant effects of implementing the local plan</p> <p>E1: Finalising aims and methods for monitoring<br/>                     E2: Responding to adverse effects</p>  |

**3.5** The Scoping Report provides up-to-date baseline information on the environmental, social and economic characteristics of the plan area (Section 2), including the likely evolution of the baseline position which would occur without the plan. It also includes a full review of policies plans and programmes (section 4), as required by the SEA Regulations. This provides a "snapshot" of the state of the environment of Wandsworth at a particular point in time and is set out in section 4 of the Scoping Report. The Scoping Report also shows how the IIA covers all the topics required by the SEA Regulations (Table 4,1). Key issues identified by the baseline review are set out and can be summarised as follows:

#### Pressure on the natural, built and historic environment

- Pressure for development on open spaces.
- SSSIs in unfavourable, recovering condition.
- Some priority species in decline.
- Loss of wildlife habitats.
- European designated sites vulnerable to recreation pressure and air pollution could be affected by the Local Plan reviews.
- Large number of conservation areas within the borough.

#### Waste reduction and sustainable consumption of resources

- Low levels of waste re-use and recycling.

#### Climate change and air quality

- Challenging London-wide targets for emissions reductions and decentralised energy provision.
- High number of properties at risk of flooding (fluvial and pluvial).
- Whole population live within an Air Quality Management Area.

#### Population and household growth and housing demand and supply

- Resident population is growing fast and this is projected to continue.
- High and increasing population density.
- High demand for affordable housing.

#### Pockets of deprivation and social exclusion

- Lower percentage of pupils achieving 5 or more A\*-C grade GCSEs than the London average.
- Parts of Tooting, Battersea, Queenstown and Roehampton currently show some level of deprivation. These are the borough's 'priority neighbourhoods'.

#### Public health

- Lower than average (for London) life expectancy.
- Higher mortality ratio than the London average.



### Traffic congestion and public transport infrastructure

- Significant traffic congestion on the main road network.
- Overcrowding on public transport at peak times.

### Business and Employment

- Limited amount of flexible, modern, affordable business accommodation.
- Loss of industrial land and a need to retain sufficient industrial floorspace.
- Predominance of small firms.
- There is a range of employment types in the Borough.

**3.6** The Report then sets out a methodology and framework for the assessment of the Local Plan reviews and their alternatives at later stages of the Plan review process and identifies the significant effects that the assessment will need to focus on.

**3.7** The key issues identified through the review of baseline data and the objectives of relevant other policies, plans and programmes (PPP) are set out in section 5.2 of the Scoping Report alongside the proposed IIA Framework which is also set out in full in the report (Table Exec.1) and summarised in section 5. This contains the objectives which will be used to test the performance of the new policies in the Employment and Industrial Land Review Wandsworth Local Plan. It should be noted that an SA (integrating Equalities Impact Assessment) of the Wandsworth Local Plan, adopted in March 2016 was carried out at key stages of plan production, and information from these reports was used and updated in the preparation of the Scoping Report.

**3.8** The updated baseline and review of plan policies and programmes was produced as part of the Scoping Report, which included any limitations of the information collected, and any assumptions made in formulating conclusions and objectives. These include disclosure and confidentiality restrictions as well as output geography such as data released only at regional level, differing models and data sources for the same data, for example population data sources that include the GLA projections, CLG projections and ONS statistics and projections. Any data gaps have also been listed in the Scoping Report and these have been considered in preparing the revised monitoring framework/list of indicators in section 7 of this report (Mitigation and Monitoring). Whilst the Census is an important source of data for identifying trends and setting indicators, it is collected infrequently and much of the information collected changes substantially each decade, making direct comparison of data and therefore reliable identification of trends very problematic. Indicators reliant on the Census such as self assessment of health and the economic activity of individuals lack current data. It is notable that there is no local trend data on biodiversity; data on species population for example has not been collected in a consistent or reliable manner to allow robust analysis.

**3.9** The Scoping Report was sent out for consultation to key stakeholders (Environment Agency, Natural England, Historic England, Wandsworth Public Health), adjoining boroughs and relevant Council corporate policy and review team members including those responsible for equalities, for a 5 week period from 15th August to 16th September 2016. The comments

received have further informed the baseline, the review of plans and programmes, and the IIA framework presented in the post-consultation version of the Scoping Report. This includes representations on data sources from the Environment Agency, Natural England and the Council's Ecology Officer. Natural England did not suggest that a Habitat Regulation Assessment would be required for the Partial Review of the Local Plan. This is not unexpected given the scope of the policy options, and that the type and location of the employment land and site allocations which are the subject of this review remain substantially unchanged from the adopted Local Plan; taking into account consultation with Natural England, the policy options are not expected to have any additional impact on protected sites or species as identified in the Scoping Report. Subsequent communication and consultation with Natural England on the development of the policy options did not result in a response, and specific communication with Natural England regarding this IIA and the need for HRA or a Screening Opinion on the policy options did not result in this requirement being identified. This matter will be revisited when undertaking the Full Review of the Local Plan. Responses received from stakeholders on the Scoping Report consultation will be made available for information alongside the Scoping Report on the Council's website.

## **The IIA Framework**

**3.10** The proposed assessment framework is set out in Section 5.2 of the Scoping Report. The IIA Framework has been developed in an iterative manner using the SA Framework prepared for the Wandsworth Local Plan which was adopted in March 2016 as a starting point. The SA Framework prepared for the Wandsworth Local Plan has been reviewed and found to be largely fit for purpose. The key messages identified in the PPP review and the issues identified through the baseline data analysis presented within Section 4 have been incorporated into the IIA Framework and minor adjustments have been made to the IIA Framework in order to ensure that it reflects the key sustainability issues that will apply during the Wandsworth Local Plan Partial Review and Full Review Local Plan timescale.

**3.11** The IIA Framework contains 20 IIA Objectives which have been used in the appraisal tables to assess the sustainability performance of the Local Plan and its alternatives (listed below). The IIA Framework reflects the key sustainability issues which are specifically relevant to the Borough.

IIA1: Avoid loss of designated ecological sites, priority habitats and species.

IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough.

IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains.

IIA4: Enhance the benefits to all from biodiversity and ecosystem services and establish and retain inter-connected multi-functional green infrastructure.

IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy.

IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.

IIA7: Maintain and improve air quality.

- IIA8: Promote renewable and low carbon energy generation.
- IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS.
- IIA10: Provide more housing opportunities for Wandsworth residents and workers.
- IIA11: Ensure people have access to essential community services and facilities, including open space.
- IIA12: Reduce poverty, social exclusion and health inequalities.
- IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief.
- IIA14: Address Council aspirations within priority neighbourhoods.
- IIA15: Protect and improve public health.
- IIA16: Reduce the impact of noise.
- IIA17: Encourage the growth of sustainable transport.
- IIA18: Reduce the need to travel.
- IIA19: Provide employment space to meet the borough's needs.
- IIA20: Ensure people have access to suitable employment opportunities.

**3.12** Whilst many objectives may complement each other (such as 'IIA7: Maintain and improve air quality' and 'IIA9: Promote renewable and low carbon energy generation') other objectives may be in tension with each other, such as those which protect the environment and health (e.g. IIA5 and IIA15) and those which promote development (e.g. IIA20 and IIA11). In order to ensure that development in the borough is sustainable, the IIA will seek the simultaneous achievement of all IIA Objectives through the Local Plan reviews and ensure that no one objective is achieved at the cost of others.

## 4 The Wandsworth Local Plan

### Introduction

**4.1** The Wandsworth Local Plan currently consists of 3 development plan documents all adopted in March 2016: The Core Strategy, the Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD) and supplemented by the Policies Map. As explained in section 2, the Council considers that a partial review of the employment and industry policy area is required. As such, Wandsworth is producing a new Local Plan document covering employment premises and industrial land which will form part of the Local Plan for Wandsworth and which will set out relevant planning policies and allocating sites. It will partly replace the existing Local Plan Documents as set out in section 2.

**4.2** Consultation on the initial preparation stage of the Employment and Industry Local Plan review was undertaken for 7 weeks from 11th December to 29th January 2016. The consultation sought comments on how the review will 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 review. In March 2016, the Council commissioned AECOM to undertake an Employment Land and Premises Study (ELPS) of the Borough. The ELPS is used to inform the future approach to the provision, protection, release and enhancement of employment land and premises. The Study identifies three growth scenarios for the Borough based on the employment forecast produced by GLA Economics. The ELPS then considered the potential to meet the planned requirement and made a range of recommendations as to how the employment and industry review should support the local economy. Overall, the ELPS recommended the broad retention of much of the industrial land in the Borough alongside some re-designation over the plan period, whilst recognising a requirement for intensification of uses and an increased supply of office space.

## Policy context

**4.3** The National Planning Policy Framework (NPPF, 2012): This sets out the government's planning policies - a key theme being a presumption in favour of sustainable development. The NPPF sets out 12 core planning principles including the requirement for planning to be genuinely plan-led, to have up-to-date local plans, and for plans to be based on joint working and co-operation. Planning should pro-actively drive and support sustainable economic development to deliver homes businesses and industrial units, infrastructure and thriving local places. In addition to providing guidance on drawing up local plans, the NPPF warns that planning policies should avoid the long term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose and expects land allocations to be regularly reviewed. The NPPF expects Local Plans to be flexible and to be able to respond rapidly to changing circumstances. In respect of evidence, it identifies the advantages of carrying out land assessment for housing and economic development to inform local needs and in order that sites may be allocated for the most appropriate use. As this is a partial review, the potential for employment uses has been assessed. Where some sites also have potential for housing this will be taken into account when undertaking the Full Review of the Local Plan.

**4.4** The London Plan: In addition to national policy, local plans produced by London boroughs need to be broadly compliant with the London Plan. The London Plan sets out the Mayor's vision and objectives in relation to London's economy and seeks to ensure that the challenges of economic and population growth can be met and that the capital remains an internationally competitive and successful city with a strong and diverse economy. An update to the London Plan has been announced and aims to place stronger protection for small businesses and start-up workspace, and delivering new spaces for small businesses particularly in the creative sectors. The London Plan's policies relating to employment and industry have been taken into account in drawing up the policy options, and in respect of this IIA have formed part of the appraisal of the 'no plan' option whereby the absence of a policy in the Wandsworth Local Plan would rely on the relevant London Plan Policy where such a policy exists.

**4.5** The Wandsworth Local Plan evidence base: The Employment Land and Industry review has been informed by a number of information sources - primarily the Wandsworth Employment Land and Premises Study (ELPS). The ELPS identified a range of forecast demand for both office floorspace and industrial land between 2016 and 2030 for different growth scenarios based on either the economic forecast of Wandsworth itself or of the wider functional economic market area (FEMA). The report made a number of recommendations which have been reflected in the policy options and are appraised in appendix 3. The review is also informed by various studies and reports including those produced or commissioned by the Greater London Authority (GLA), which are also the evidence base to the London Plan.

**4.6** Wandsworth Spatial Vision and Strategic objectives: The Employment Land and Industry review is only a partial review of the Wandsworth Local Plan, and the resulting policies and site allocations will need to fit into the existing adopted spatial vision and strategic objectives which are set out in the Core Strategy. For the Purposes of this IIA it is important

to note that the strategic objectives are still relevant and will not need to be changed as part of this Employment and Industrial Land review. The strategic objectives most relevant to this review are:

- Seek to maximise the employment potential of land in the borough by safeguarding land and buildings for business and industrial use and promoting development for employment purposes in appropriate locations including as part of a mixed use development so as to increase job and business opportunities.
- Promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough.
- Increase the vitality and viability of the town centres and local centres, including the proposed centres at Battersea Power Station and Vauxhall, as the focus for shopping and for employment and leisure and other community uses.

**4.7** A broad set of policies have been identified that the Employment and Industry Local Plan (EILP) will need to address. For each policy, a number of options have been identified. These options have come from a range of sources including the existing approach set out in the adopted Local Plan, findings of the ELPS, representations from the Regulation 18 consultation, meetings with external and internal stakeholders, the London Plan and national guidance. This IIA report appraises the first draft of the policy options which have been closely informed by the policy options document, and which underwent consultation between 7th October and 4th November 2016. Some of the options were not explicitly suggested in the policy options consultation, though they were implicitly covered. The options were intended to be broad-based and did not go into detail regarding area spatial strategies or, in the main, site allocations. However where site allocations were considered to be significant options, these have been appraised as part of the Policy Options.

### **Consultation on the Local Plan and next steps**

**4.8** Public consultation on the Proposed Submission version of the Local Plan Employment and Industry Document forms part of the process of updating the Local Plan and will be carried out in March to April 2017, in accordance with the Council's Statement of Community Involvement. The LPEID, along with this IIA and the consultation responses, will then be submitted to the Secretary of State for public examination.

**4.9** The end result of the Local Plan review will be the production of a new Local Plan document, covering employment and industrial land and premises and containing revised relevant policies and site allocations. This will sit alongside the existing Local Plan documents, replacing the current employment and industry sections.

## 5 Methodology

**5.1** This IIA report has been prepared in line with the IIA process set out in a table in Section 3, beginning with a new Scoping Report needed to develop the IIA objectives and appraisal framework. The Scoping Report also set out broadly how the IIA Stages and Tasks will be carried out which are set out in the IIA Process table. As this is a limited review covering employment and industry only, and the remainder of the recently adopted Local Plan will remain in force, the scope of this appraisal is correspondingly more limited in scope than can be expected of a full review of the Local Plan.

### **Who carried out the IIA:**

**5.2** Council planning officers involved in other policy areas took the lead, using information sourced from the Scoping Report (2016) prepared by CAG consultants, regarding updating baseline data, plans and programmes, and on-going liaison with officers responsible for the Authority Monitoring Report (AMR) and planning statistical information regarding monitoring and indicators. This has ensured that baseline data, updated monitoring information, and future indicators are and will be relevant and measurable, particularly regarding those AMR indicators/targets that also monitor the sustainability objectives. The updated monitoring framework will be included in the next AMR. A degree of detailed baseline information came from Census data or is collected internally from officers in other Council departments, and from information provided following consultation which included the statutory consultees: The Environment Agency, Natural England and Historic England.

### **When the IIA was carried out:**

**5.3** Work on this IIA report has been carried out alongside production of the changes to the Local Plan Employment and Industry Review following Regulation 18 consultation and before Submission at Regulation 19 stage. This IIA has been carried out to provide an additional evidence base to inform the policy options to be submitted under Regulation 19. It was completed following the update of the scoping report in October 2016 and following public consultation on the Regulation 18 options. These are the options therefore that have been tested, and are replicated in the appraisal tables in appendix 1. The options do not appear exactly as those in the Policy Options Consultation document (October 2016); however, their scope is the same and they have been translated into more detailed and technically robust language as befits the rigour of the IIA. Alongside the results of consultation on the policy options and any new relevant data, the appraisal results of this IIA will form part of the evidence used to assess which of the policy options appraised for each proposed policy will be the policy approach set out in the Proposed Submission stage.

### **How the appraisal of policy options was carried out:**

**5.4** Each policy and the associated policy options is scored against the 20 IIA objectives identified in the Scoping Report's assessment framework. Each policy also contained a 'no plan' and 'status quo' option. The predicted impacts have been recorded as strongly positive, positive, neutral/unknown, negative or strongly negative as set out in the table below.

Consideration of short, medium and long term impacts, and predicted impacts beyond the borough boundary have been considered and identified where relevant in the wider commentary of appraisal findings in section 6. It is important to note that the actual impacts of many of the options tested here would also be influenced by the interplay of other relevant policies in the adopted Local Plan and which are not subject to review at this stage. Those objectives relating to the Health Impact Assessment and to the Equalities Impact Assessment have been colour-coded to assist in interpretation, and the overall score of each option is indicated by a simple colour coding of green- positive; amber- neutral, and red - negative.

|  | ASSESSMENT/PREDICTED EFFECTS  |  |
|--|---|--|
| IIA 12-14 Equalities Impact Assessment | Overall Score:<br>Green = positive<br>Amber = neutral<br>Red = negative | + Minor positive effect<br>++ Major positive effect                        |
| IIA15-16 Health Impact Assessment      |   | – Minor negative effect<br>– –Major negative effect<br>0 Neutral/no effect |



## 6 Assessment findings

**6.1** This section sets out the options that were tested in the detailed appraisal tables in appendix 1 and summarises the main findings. The regulations require that the "no plan" scenario is also tested. In some cases the "no plan" option would mean that planning applications would be determined against the relevant London Plan policies which address London's economy and which is also a statutory development plan for the borough. This includes strategic matters such as sustainable economic growth, and policies relating to the Central Activities Zone (CAZ), strategic office demand, industrial land and premises, waste management and businesses supporting the central London visitor and service economy such as hotels and restaurants. Wandsworth is identified in the London Plan as 'restricted (with exceptional planned release) for the transfer of industrial land to other uses' meaning that the London Plan acknowledges that the industrial land Wandsworth such as the Wandle Valley, is important to London as a whole. Where the impact of a policy option including a 'no plan' situation is predicted to impact other London boroughs, this is included in the commentary with an indicative timescale (ie effect predicted in the short, medium or long term). Similarly the 'status quo' option has been appraised where relevant, based on existing adopted policy but taking account of updated growth forecasts and other evidence on demand and supply as identified in AECOM's study, and London Plan evidence such as the London Office Policy Review.

### General Observations

**6.2** Where the 'No plan' option means that protection of offices, industrial and employment land is protected by a policy in the London Plan, these will have already been subject to sustainability appraisal as part of the London Plan-making process. As the scope of this review is limited to an Employment and Industrial Land review, a none of the options are expected to impact on IIA objective IIA1: Avoid loss of designated ecological sites, priority habitats and species; IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains; and directly on IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS. Even where there is 'no plan option', the recently adopted Wandsworth Local Plan (2016) policies will apply which protect designated ecological sites, priority habitats and species which would preclude development especially from office employment and industrial use and other employment uses. Similarly policies relating to the IIA objectives would continue to offer protect to heritage assets (DMS2) and flood risk (DMS5-07) for example. Similarly in terms of health impact and equalities impact, the limited nature of this review means that the predicted effect on their respective indicators tends to be limited - for example to the impact of local job creation/training on addressing inequalities including inequality of opportunity or on regeneration areas; or a "no plan" option on the siting of employment related activities whereby the protection of employment uses or their location in terms of effects on residential occupiers may affect poverty particularly in deprived areas, or public health. As new Policy EI6 concerns different levels of subsidisation of a particular sector of the economy, it cannot

be expected to have any impact regarding protection of employment uses directly, or regarding location, therefore the predicted impacts generally relate to the effect of different levels of support and the indirect effects this would have particularly on employment, inequalities and identified regeneration areas.

### **POLICY OPTIONS:**

#### **Policy EI1 Strategic Approach - encouraging sustainable economic growth: Growth Scenarios**

**6.3** Demand Projections: AECOM's Employment Land and Premises Study (July 2016) included forecasting office demand between 2016 and 2030 as follows:

- A forecast demand for additional office floorspace between 2016 and 2030 of between 31,700 and 65,800 sq ms; and
- A forecast demand for an additional 8.2 Ha or a contraction in demand of -9.5 Ha for industrial land in the borough between 2016 and 2030.

### **COMMENTS**

**6.4** The ranges set out in the forecasts above give different growth scenarios, based either on the economic forecast for the borough itself or for the wider functional economic market area (FEMA) which includes surrounding boroughs. These growth scenarios give a helpful indication of demand, but setting exact targets for the supply of economic uses would not be appropriate, given the uncertainties in the economy and the implications for office supply. It is therefore more appropriate to seek to plan for a range of demand, with monitoring of the supply that comes forward. The demand projections set out above do not take into account the step-change in supply and the quantity and type of offices coming forward at Nine Elms as part of the VNEB Opportunity Area. The London Plan sets a benchmark figure (set out in more detail in the Land for Industry and Transport Supplementary Planning Guidance [SPG]), for the planned release of industrial land to other uses for each London borough.

**6.5** The latter will have already undergone sustainability appraisal as part of the London Plan process. For other policy matters, as targets have not been set in the draft policy document and taking into account the level of economic uncertainty, and that growth scenarios are only one indicator in a range of employment needs, it is not considered appropriate to carry out an IIA of the growth scenarios.

#### **Policy EI2 - Protecting and Re-designating Industrial Land (B2-B8 uses)**

Nine Options were tested as follows:

Option 1: Protect all existing industrial land (whether currently protected or not), including remaining industrial land in Nine Elms and MUFIEAs, smaller industrial clusters (eg Jaggard Way) and undesignated sites (eg railway arches).

Option 2: Protect all land currently protected as SIL or LSIA (status quo).

Option 3: Protect the land identified as SIL or LSIA but not Bendon Valley bingo hall or Wandsworth gas holder.

Option 3a: as for 3 but with additional mitigating protections for other existing industrial land (eg Jaggard Way, railway arches) meaning they will be protected unless redundant.

Option 3b: as for 3a but with additional surrounding sites re-designated to mixed use, ie Frogmore depot, Riverside business centre.

Option 4: Promote mixed use re-development in LSIA provided industrial floorspace is re-provided and that employment floorspace for SMEs is provided alongside residential providing for different parts of the local economy.

Option 5: Promote a mix of uses in SIL and LSIA with re-provision of any employment-generating use (not just industrial) and planned redevelopment of these areas (ie MUFIEA plus area spatial strategy approach).

Option 5a: As above but with re-provision of any B class use.

Option 6 No plan scenario: No policy control and no designation of areas for protection of B2-B8 uses.

The site-specific options set out in the options above resulted from previous consultation and discussions where they were suggested to the Council for consideration.

## COMMENTS

**6.6** Option 1 - This is similar to status quo in that it would provide employment opportunities. It can be predicted that this option would give rise to a positive strategic/cross boundary effects as industrial land in Wandsworth provides a strategic reserve. The medium to long term effect is uncertain as dependant on new SHLAA/HELAA and over-protection would not optimise sites for new housing opportunities and protection of the smaller, undesignated non-strategic sites would not be flexible enough to meet office/SME demand. This approach would also limit the long-term regeneration opportunities for priority neighbourhoods, and in particular would undermine the on-going regeneration of the Nine Elms area, which includes substantial planned investment in infrastructure and new business premises.

**6.7** Option 2 – This also provides employment opportunities. However it can be predicted that this option would give rise to a negative strategic/cross boundary effect as industrial land in Wandsworth provides a strategic reserve and if lost could result in a more limited economic base in Wandsworth detrimental to the economy overall and increased traffic generation particularly for logistics as a reduced supply of industrial land in this part of London will result in increased distribution traffic and longer journeys detrimental to to objective IIA18 reducing the need to travel. A corresponding negative effect is predicted on maintaining and improving air quality (IIA7). Negative impacts are also likely to be experienced as a result in other London boroughs as this option is likely to displace demand increasing pressure on industrial land in adjoining boroughs in the medium to long term increasing rents and reducing the opportunity to release surplus land in those boroughs for other uses including mixed use residential.

**6.8** Option 3 – A similar effect is predicted to Option 2. Note that Options 3, 3a and 3b would continue to make a contribution to the local employment market, as former industrial uses would make way for mixed uses which tend to be developed at higher densities than industrial uses. The removal of Bendon Valley bingo hall or the Wandsworth gas holder would not be significant given their scale, and considering that neither site currently comprises standard core industrial uses. In considering the options, it is predicted that the option of retaining them for industrial uses is unlikely to result in their continued use for industrial uses, as the decommissioning costs of the gas holder would be prohibitive and due to strong demand and the success of the existing Trampolining Centre at Bendon Valley. This would have a negative effect on the objectives - reducing the range of employment opportunities available, increasing the need to travel and therefore affecting air quality - IIA18: Reduce the need to travel; IIA7: Maintain and improve air quality and IIA20: Ensure people have access to suitable employment opportunities.

**6.9** Options 3a and 3b - The appraisal table indicates that these two options provide the best overall score against the IIA objectives - primarily in continuing to retain employment land, widening the economic base and enabling access to suitable housing and jobs. Promoting mixed use in options 3a and 3b would mean that the sites would still contribute towards both the housing supply and to the economic base of the borough. New mixed use development would be designed and located to enable buffer zones between the industrial uses and noise-sensitive residential development. These options therefore score positively against objectives IIA10: Provide more housing opportunities for Wandsworth residents and workers and IIA16: Reduce the impact of noise; IIA11: Ensure people have access to essential community services and facilities, including open space; and IIA4: Option 3b may also present more opportunities to improve biodiversity and enhance the natural environment, for example improvements to the River Wandle - and scores positively against objective IIA4 - Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure. Both options score particularly strongly against objectives IIA19: Provide employment space to meet the borough's needs; and IIA20: Ensure people have access to suitable employment opportunities. These options would allow sites not comprising significant amounts of industrial floorspace at the present time to yield additional industrial floorspace in the medium to long term. This yield would be limited unless the policy option was changed to require further industrial floorspace and this would therefore have enhanced the IIA score. The levels of protection enabled by policy options 3a and 3b would additionally have an indirect positive effect on objective IIA7: Maintain and improve air quality in that the increased distances required to be travelled by lorry and heavy vehicles to access alternative industrial and waste sites would be avoided. Similarly, as these sites are also employment locations, their retention would reduce the need to travel to access these types of employment further afield scoring positively against objective IIA18: Reduce the need to travel.

**6.10** Option 4 - This involves redevelopment at higher density to ensure no net loss of industrial floorspace, but to enable new business floorspace suitable for meeting the high demand for SME floorspace in the borough as part of mixed use development including some residential use. SME uses could act as a buffer between the potentially intrusive industrial and residential uses but in the short and medium term detrimental impact on noise and air

quality may be experienced on new residential occupiers, which could in turn impinge on the operation of established and incoming businesses. Inevitably higher density development will result in net increase in waste production and energy consumption however new development will be subject to policies requiring low carbon development and SuDS/flood risk policies. Whilst this option is not likely to have a negative impact on employment and housing-related objectives, negative impacts are therefore predicted against objectives.

**6.11** Options 5 and 5a - As with option 4, in the short and medium term detrimental impact on noise and air quality is likely to occur. For both options in the medium to long term it is likely that industrial uses will be replaced by higher value and higher density uses - mixed uses for option 5, and potentially by higher value/density B1 uses for option 5a - meaning that industrial uses are likely to be pushed out to other London boroughs, or even further afield by both options, but to a greater extent for option 5.

**6.12** Option 5a - The introduction of a B1 use particularly B1a goes against the NPPF, London Plan and Local Plan policy whereby B1a offices which are classed as a town centre use/town centre first approach; the borough's industrial areas are largely out of town centres. Juxtaposition of B1a uses with industrial uses are likely to result in significant impacts of noise and air quality to occupiers of the B1 use with a corresponding negative impact on health of employees and visitors. Overall impact is likely to be neutral however as loss of some B1c, B2-8 uses for non-emitting B1 uses could benefit air quality and reduce noise emissions. Higher density B1 development will increase job density and provide a wider range of job opportunities. As above, higher densities would give rise to an overall net increase in waste production and energy consumption. However new development will be subject to policies requiring low carbon development and SuDS/flood risk policies on each individual new development. As with option 4 in the short and medium term detrimental impact on noise and air quality may be experienced on new residential occupiers. For both options it is predicted that negative impacts on air quality will occur particularly for option 5, which will arise locally through the increased lorry movements to and from industrial sites further afield. This would increase traffic generation and result in longer journeys. Subsequent negative indirect effects would therefore be an increased consumption of resources, notably increased use of fossil fuels primarily through commercial traffic. For both Options 5 and 5a this translates into the predicted strong negative scores against IIA objectives IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy, IIA7: Maintain and improve air quality, IIA17: Encourage the growth of sustainable transport. In limiting the economic base of the borough, negative impacts are also predicted against objectives IIA18: Reduce the need to travel and IIA19: Provide employment space to meet the borough's needs. Negative impacts of both options 5 and 5a are also likely to occur beyond the borough boundary - the effect on adjoining boroughs could mean that additional demand from displaced Wandsworth industrial businesses could put pressure on land not designated for industrial uses and therefore affect the balance of their respective economies and ability to provide housing in those boroughs. Whilst waste policy is not being reviewed per se at this time, as explained elsewhere in the IIA, the impacts of an option where land is no longer protected just for industrial uses (B1c, B2-B8 and related Sui Generis uses) could result in higher value land uses displacing land currently used for waste purposes (which serve four London boroughs in the WRWA area) with the result that domestic and commercial

waste would have to travel greater distances to sites beyond the borough boundary, and putting pressure on existing waste sites in other London boroughs. In terms of overall impact, option 5a is more likely to retain some industrial uses limiting the negative effect on the range of employment opportunities (IIA 20) including B1c. In contrast in allowing more noise and pollution sensitive employment generating uses such as shops and other A1 uses that attract high footfall, option 5 would result in a more marked negative impact on noise (IIA16: reduce the impact of noise) and a more marked negative effect on the range of employment opportunities (IIA20: ensure people have access to suitable employment opportunities) through conflicts with existing/original noise generating and polluting industrial uses (as noise complaints may force out the original industrial uses.)

**6.13** Option 6 - As existing guidance has already been subject to SA therefore it is not relevant to carry out any further assessment.

**6.14** As none of the options (apart from option 6) would result in a net loss of employment land, there is likely to be a neutral effect on objective IIA14: Address Council aspirations within priority neighbourhoods.

### **Policy EI3 Protecting office floorspace**

Five options were tested as follows:

Option 1: Protect offices in town centres and the Thames Policy Area (status quo).

Option 2: Protect offices in the CAZ, town centres, focal points, small clusters near transport interchanges, edge-of-centre areas.

Option 3: Protect all remaining offices in the borough.

Option 4 Protect offices only in town centres and edge of centre locations and seek to maximise new housing potential on sites elsewhere.

Option 5 No plan scenario: Do not have a policy protecting office floorspace.

### **COMMENTS**

**6.15** Wandsworth's stock of offices is generally widespread amongst the 5 town centres and in the Focal Points of Activity in the Thames Policy Area, and the adopted plan protects offices in these locations. Offices are also located elsewhere including the protected industrial land (SIL and LSIAs). Consultation on the options below considered protection in 4 main areas: the town centres, the Nine Elms part of the CAZ, Focal Points of Activity, and smaller officer clusters near to transport interchanges or on the edge of town centres.

**6.16** Options 1 and 2 - Whilst option 1 generally scores well as to be expected for a recently-adopted policy, the appraisal table indicates that option 2 provides the overall best score against the majority of the sustainability objectives, whilst continuing to retain land for offices.

**6.17** Option 2 - This option introduces protection to clusters of offices in appropriate locations, securing continued business floorspace and therefore scoring positively against IIA19: Provide employment space to meet the borough's needs and IIA20: Ensure people have access to suitable employment opportunities. This would protect more offices than Option 1 and, while less of the Thames Policy Area would be protected, those areas not covered are largely without significant clusters of offices. This option would retain, and through densification and appropriate identification of new locations for office protection, increase employment opportunities, and therefore impact positively on poverty and social exclusion. This includes areas identified for regeneration, therefore scoring positively against objective IIA14: Address Council aspirations within priority neighbourhoods. Were these areas not protected, the high demand for offices could be forced to locate in more limited sites, and may displace other town centre uses such as shops, community uses and limit opportunities for new housing. Retaining the CAZ in Nine Elms as a protected office location is predicted to have positive impacts in the medium to long term. Similarly as offices in the Nine Elms part of the CAZ are completed and occupied, this would also have a strategic-level positive impact on the economy of London as whole in meeting the growing office demand avoiding displacement by the more profitable prime residential property for which there is strong demand in this location and therefore enabling their ability to plan effectively for employment and housing opportunities. Overall this option has the effect of further widening the economic base, supporting the Central London economy, and enabling access to suitable housing and jobs in the most sustainable locations. Protection of land designated for offices is likely to focus new demand in these areas which are generally well connected by public transport and benefit from being located in mutually beneficial clusters, rather than located where negative impacts on ecology, biodiversity and/or heritage assets may arise.

**6.18** Option 3 - Protection of all offices in the borough is predicted to have a detrimental impact on the supply of new housing - where the location is not suitable or marketable, other options in particular new housing may be preferable and may make the most efficient use of land. High density development in the CAZ/Nine Elms area and in the town centres can ensure office floorspace growth in a more efficient and marketable format and in sequentially preferable locations. Relying on older building stock means that the existing office stock is less efficient overall than a modern replacement which must meet modern standards on low carbon development and energy reduction. The impact on this option therefore are predicted to be negative notably against objectives IIA10: Provide more housing opportunities for Wandsworth residents and workers; IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy (because of the age of the building stock being inefficient compared to new build office standards) and IIA19: Provide employment space to meet the borough's needs.

**6.19** Option 4 - Similar impacts are expected as with Option 2. In addition this option, because it excludes the CAZ and which is also part of the TPA - is predicted to have significant negative impacts strategically on meeting office demand because offices that would be focussed in the Wandsworth part of the CAZ (and Nine Elms Opportunity Area generally) would be likely to be displaced by the more profitable prime residential property for which there is strong demand in this location. This displacement to other boroughs is predicted to have negative impacts on access to housing and employment opportunities and affect the

distribution and employment land leading to longer journey times and a subsequent reduction in air quality, as it may compromise their ability to plan effectively for employment and housing opportunities London-wide. It may also reduce the overall supply of central London office floorspace if the displaced demand cannot be met elsewhere within the CAZ. Whilst Option 4 is likely to significantly increase housing supply, borough-level monitoring of the housing pipeline does not indicate the need to release land protected for office purposes in the CAZ/Nine Elms to meet housing targets. The introduction of high density housing may give rise to noise conflicts with existing office businesses which may give rise to complaints and them subsequently moving out of the area. The positive impact on objective IIA10: Provide more housing opportunities for Wandsworth residents and workers would be offset by strong negative impacts on IIA16: Reduce the impact of noise; and IIA20: ensure people have access to suitable employment opportunities through the removal of many locations currently protected for offices, alongside negative effects on IIA7: Maintain and improve air quality and objective IIA18: Reduce the need to travel. The lack of protection for offices in the CAZ, and the consequent effects on the economy of this area as a whole, would score negatively against IIA14: Address Council aspirations within priority neighbourhoods.

**6.20** Option 5 - Without a policy protecting offices, London Plan Policies 4.2 and 4.3 would continue to apply, which support offices and require boroughs to consider London-wide office needs. This option has already been subject to SA as part of the London Plan process therefore it is not relevant to carry out any further assessment.

### **Policy EI4 – Meeting demand for new employment floorspace**

Six policy options were appraised as follows:

Option 1: Support the development of large-scale offices in Nine Elms, as per the VNEB OA and adopted Local Plan (status quo), to meet demand for c. 200,000 sq ms of floorspace (status quo).

Option 2: Intensify requirement for large-scale office floorspace in Nine Elms to meet additional demand on remaining sites.

Option 3: Scale back development in Nine Elms and spread more evenly across the borough's 5 town centres.

Option 4: Identify specific sites to meet the demand for office floorspace for local and sub-regional office market, prioritising town centres then edge-of-centre then out-of-centre sites.

Option 4a: As for option 4 but without prioritising any specific areas.

Option 5: No plan scenario: Expect to meet office floorspace for local and sub-regional office market without identifying specific sites, relying on windfall development.

### **COMMENTS**

**6.21** Option 1 -This option (the status quo approach) is generally sustainable in the short term, as can be expected of a recently adopted policy. However overall, considering the medium to long term effects, it would not provide sufficient capacity to meet the predicted



demand for office space in the borough and would not enable employment space to be utilised more efficiently. In the short term it is likely to have some positive outcomes against the related objectives IIA18 and IIA7 (Reduce the need to travel; Maintain and improve air quality) as the offices are currently well distributed in sustainable locations; and to objectives IIA12: Reduce poverty, social exclusion and health inequalities and IIA14: Address Council aspirations within priority neighbourhoods reducing poverty, social exclusion and health inequalities; and IIA19: Provide employment space to meet the borough's needs; and IIA20: Ensure people have access to suitable employment opportunities, but a stronger outcome is predicted by option 2. The status quo approach in the medium to long term is predicted to have a negative score against IIA19: Provide employment space to meet the borough's needs - as the status quo reflects past demand trends and would not make the best economic use of potentially suitable sites for offices outside the locations identified in the 2016 adopted Local Plan. As this option aims to bring forward development there will inevitably be an overall increase in the consumption of natural resources and in waste arisings, and so a negative score is recorded against IIA objectives IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy; and IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.

**6.22** Option 2 - This option would not achieve the objectives for the new neighbourhood at Nine Elms which has been planned in the Opportunity Area Planning Framework and Area Spatial Strategy (in the Adopted SSAD) to incorporate housing, retail, community and employment uses. Whilst this option may produce a degree of additional employment opportunities for local residents, and score positively against IIA19: Provide employment space to meet the borough's needs; overall it would compromise the commercial uses such as shops and bars, community uses and residential uses and therefore what is set out in the OAPF and SSAD for Nine Elms to be a new self-contained neighbourhood. This is reflected in scoring negatively against objective IIA14: Address Council aspirations within priority neighbourhoods; IIA objectives IIA10: Provide more housing opportunities for Wandsworth residents and workers; and IIA11: Ensure people have access to essential community services and facilities, including open space. A further intensification of offices in the CAZ/Nine Elms area would undermine these objectives and would also be detrimental to the the other five town centre as office locations. Intensification in Nine Elms/CAZ would also have impact beyond the borough boundary in the medium to long term potentially drawing in new office developments from other Central London boroughs. It is also likely therefore that additional employees may need to travel from further afield as this additional floorspace could have been displaced from another location with Central London, reflected in the predicted strongly negative scores against IIA7: Maintain and improve air quality and IIA18: Reduce the need to travel. As with option 1, as both these options aim to bring forward more development there will inevitably be an overall increase in the consumption of natural resources and in waste arisings, and so a negative score is recorded against IIA objectives IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy; and IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy.

**6.23** Option 3 - Attempting to redirect office demand on Wandsworth's existing five town centres scores negatively, and strategically the office market in the Nine Elms area relates to the prime property location in the CAZ. Reducing the opportunity for offices in this location therefore is predicted to have a negative impact strategically in the medium to long term as this is likely to displace the demand for large-scale central office floorspace into the inner London boroughs and other sites in the CAZ which may limit the opportunity to plan effectively for housing and mixed uses these areas. This is predicted to increase distances travelled by Wandsworth residents to access office jobs in other boroughs, also impacting negatively on air quality and would increase consumption of resources. Negative impacts are recorded against objectives IIA10: Provide more housing opportunities for Wandsworth residents and workers and IIA11: Ensure people have access to essential community services and facilities, including open space. This option would impact on the diversity of the town centres as it is likely that it would displace housing and other town centre uses and potential housing sites in town centres in order to accommodate the additional office floorspace. Scaling back development at Nine Elms could also compromise this area as an important office location and may have subsequent impacts on the location of other commercial uses and supporting industries. This is reflected in scoring negatively against objectives IIA 12: Reduce poverty, social exclusion and health inequalities; IIA14: Address Council aspirations within priority neighbourhoods; IIA objectives IIA18: Reduce the need to travel; IIA7: Maintain and improve air quality, IIA19: Provide employment space to meet the borough's needs; and IIA20: ensure people have access to suitable employment opportunities.

**6.24** Option 4 - This option produces the best overall score which can be expected for this plan-led approach. This would be the best option given that Wandsworth cannot meet the increased demand for office floorspace purely within its town centres. Identification of sites at the plan-making stage would avoid planning applications for new offices coming in piecemeal in out of centre locations and passing the sequential test. This managed approach to the location of employment land is therefore predicted to have strong positive scores against IIA 12: Reduce poverty, social exclusion and health inequalities; IIA14: Address Council aspirations within priority neighbourhoods; IIA objectives IIA18: Reduce the need to travel; IIA7: Maintain and improve air quality, IIA19: Provide employment space to meet the borough's needs; and IIA20: ensure people have access to suitable employment opportunities.

**6.25** Option 4a - Whilst this policy supports new offices, Some locations are sequentially preferable than others as set out in the NPPF and London Plan, such as the CAZ and town centres. By not identifying additional suitable sites within these locations at the plan-making stage, applications for new offices are likely to be on out of centre sites and would pass the sequential test due to a demonstrable lack of suitable identified sites. Therefore whilst positive scores can be predicted against IIA objectives IIA19: Provide employment space to meet the borough's needs; and IIA20: ensure people have access to suitable employment opportunities, the lack of focus would also impact on objective IIA12: Reduce poverty, social exclusion and health inequalities and particularly IIA14: Address Council aspirations within priority neighbourhoods. If some sites were in remote locations then strong negative scores

would be predicted against IIA objectives IIA18: Reduce the need to travel; IIA7: Maintain and improve air quality, and IIA20: ensure people have access to suitable employment opportunities.

**6.26** Option 5 - The no plan scenario would rely on the London Plan, which has undergone sustainability appraisal. It designates the Central Activities Zone (CAZ) and the Opportunity Area as suitable for significant new business and employment floorspace and sets an indicative capacity of 25,000 new jobs (across the whole area, which includes parts of Lambeth). Relying on windfall development would not create sufficient developer certainty over the plan period and would have a negative impact on employment floorspace and employment opportunities through creating uncertainty over the location and levels of employment development appropriate in the Nine Elms area and elsewhere, which could prevent sites coming forward for employment development. Elsewhere a significant reduction in capacity for employment uses are likely and therefore it is predicted that this would have a strongly negative impact against IIA19: Provide employment space to meet the borough's needs; and IIA20: ensure people have access to suitable employment opportunities, and on IIA 12: Reduce poverty, social exclusion and health inequalities; IIA14: Address Council aspirations within priority neighbourhoods IIA18: Reduce the need to travel; IIA7: Maintain and improve air quality. There is likely to be a negative impact in the medium to long term on London as a whole in terms of capacity and certainty, and on adjoining boroughs who would have to absorb unmet demand which may put pressure on land allocated for other uses including housing, social infrastructure and retail in those boroughs.

### **Policy E15 – New employment development**

Four policy options were appraised as follows:

Option 1: Set specific requirements for new development (status quo).

Option 1a: as for 1 but with additional requirements for the applicant of large-scale mixed use schemes to demonstrate that employment and residential uses complement one another.

Option 2: Require the applicant to demonstrate that the site would work successfully as an employment use.

Option 3: No plan scenario: Do not set specific requirements for new employment development.

### **COMMENTS**

Option 1 - The appraisal results showed that Option 1 would generally score positively against economic objectives as it would ensure that new employment floorspace was developed in a way that met the needs of businesses. There is a concern however that adopted policies do not give sufficient guidance for high density mixed use schemes where, without proper design, potential conflicts might arise between business and residential use; this might, in the medium to longer term, fail to maximise the employment potential of Wandsworth's limited supply of developable land and therefore over the plan period would be less effective in meeting the rising demand for office and other employment uses.

**6.27** Option 1a - This option scores best against the IIA objectives - it results in maximising sites beyond those already protected for employment uses by effectively building in cross-checks which would in practice mitigate against unneighbourly forms of development such as noise conflicts. This option brings forward a wider range of suitable sites and a broader distribution of locations which could be predicted to both widen employment and training opportunities to local residents and therefore reduce the need to travel and/or reduce journey times. This is a key sustainability benefits as the indirect effect could be to reduce consumption of fossil fuels and improve air quality.

**6.28** Option 2 - This puts the onus on the applicant, and whilst this could allow more flexibility and encourage more experimental forms of business development, there is a greater risk that this option could result in uncertainty for developers, elongated negotiation on applications and ultimately schemes where the business floorspace was only suitable for a narrow range of potential occupants.

**6.29** Option 3 - The 'no plan' scenario would mean that the London Plan and the NPPF would become the default development plan; these provide limited guidance and requirements for new employment development, and this could therefore result in schemes where the business floorspace was only suitable for a narrow range of potential occupants or, at worse, was entirely unsuitable for business needs.

### **Policy EI6 Affordable, creative and flexible workplaces:**

Five Options were initially tested as follows:

Option 1: No plan scenario: Require no specifically affordable workspace, ie allow the market to set rates for all economic uses and dictate how workspace is managed.

Option 2: Require realistic rents, flexible leasing arrangements and encourage developers to come forward with development partners to manage flexible employment floorspace (status quo)

Option 3: Require rents at a specific level in relation to market rates (eg 80%) for a proportion of a scheme on large (>1,000 sq ms) employment development, secured through s106.

Option 4: Require a specific managed workspace provider to be secured through S106 on large schemes including evidence of how they cater for SMEs and provide affordable workspace (using a management plan, secured through the Local Employment Agreement)

Option 5: Require major regeneration initiatives to provide employment floorspace.

Following consultation an additional option was identified to tie in with the Planning Obligations SPD:

Option 6: Encourage the employment, training and support of local labour and commercial opportunities for existing Wandsworth businesses, to include training, and employment opportunities for local residents as well as the provision of flexible and affordable workspace and supply chain opportunities for local businesses.

### **COMMENTS**

**6.30** Option 1 - Given rising rental levels for business premises, and the pipeline of applications and prior approvals allowing loss of business floorspace, it is likely that the no plan scenario may result in the displacement of established businesses from the borough and fail to support new and growing smaller businesses, which make up the vast proportion of businesses in Wandsworth. It could also result in office floorspace only being developed for large businesses who can afford high-spec premises. This approach could also place pressure on particular sectors, specifically the creative and cultural sector which is growing in Wandsworth and which should be supported. These impacts therefore score this option negatively against objectives IIA19: Provide employment space to meet the borough's needs and IIA20: Ensure people have access to suitable employment opportunities as well as scoring negatively against objective IIA14: Address Council aspirations within priority neighbourhoods.

**6.31** Option 2 - This would ensure improved impacts compared to Option 1, however it does not reflect the current market or predicted market for managed workspace over the lifetime of the emerging Local Plan and could fail to capitalise on the growing demand for specific forms of managed workspace (such as incubator space) that could support the needs of emerging businesses in the borough.

**6.32** Option 3 - This option scores similarly to option 2, and raises similar concerns about missing the opportunity that securing managed workspace could bring; it could be used in conjunction with option 4 as an alternative, where it is impractical to secure managed workspace on a particular site.

**6.33** Option 4 - This option is predicted to have the best overall outcome when assessed against the sustainability objectives balancing growth in the appropriate locations whilst minimising negative impacts and not impacting on housing delivery. The options "requires" rather than "encourages", capitalising on the growing demand for different forms of managed workspace that cater to the various needs of different business types and sizes. It scores particularly positively against objectives IIA19: Provide employment space to meet the borough's needs and IIA20: Ensure people have access to suitable employment opportunities.

**6.34** Option 5 - This option recognises that some parts of the borough suffer from limited access to local jobs and explores the potential of providing employment opportunities in these areas that cater specifically for the needs of local residents. On its own this option would not resolve wider issues around the affordability of business premises, or capitalise on the emerging managed workspace market, however it could sit alongside option 4 giving a spatial dimension to the provision of affordable premises. It scores particularly positively against objective IIA12: Reduce poverty, social exclusion and health inequalities and objective IIA14: Address Council aspirations within priority neighbourhoods.

**6.35** Option 6 -The predicted outcome of this option against the sustainability objectives is similar to option 5 above. However the main points to note from the appraisal are that a stronger positive impact is predicted against the objective IIA12: Reduce poverty, social exclusion and health inequalities - in relation to creating employment opportunities and training for local residents, and as many supply-chain industries are located in the Nine Elms area (typically serving the visitor economy sector of Central London) it is also predicted to

score positively against objective IIA14: Address Council aspirations within priority neighbourhoods. As this option is closely tied into the SPD and will assist in its implementation, it may also be pursued in addition to option 4.

**6.36** The policy options document also explored the provision of workspace for the creative sector. This is a niche market in Wandsworth for which there is strong local demand. The strategic effects of policies seeking to address this sector are therefore likely to be minimal and therefore the effects in the assessment table are predicted to be local impacts.

### **Policy EI7 –Waste**

**6.37** Planning for Waste and the use of the safeguarded wharves are cross-London strategic matters; waste apportionments are currently allocation in the London Plan and are likely to be revised in the forthcoming review of the London Plan, along with London’s safeguarded wharves. Given these impending reviews, and considering that the existing policies were adopted recently, it is not considered necessary to review the current policy approach until the full review of the Local Plan, which will be informed by the emerging London Plan. In the interim, it is proposed that the relevant text of DMPD Policies DMI5 DMI6 and DMI7 and the relevant parts of DMI3 and Core Strategy Policy PL7 will be incorporated into the Employment and Industry Local Plan Document with minimal changes, such as updated policy numbering.

### **Policy EI8 – Redundancy of employment premises**

**6.38** The development of this policy approach balances the NPPF statement that long term protection of land for employment use must be avoided where there is no prospect of them being used for that purpose, with the updated Employment Land and Premises Study which found that on-going demand justifies retention of the borough's stock of industrial, office and other employment floorspace. This led to three options being tested relating to redundancy criteria, and two options for alternative uses as follows:

#### Redundancy Criteria

Option 1: Set redundancy requirements as per current policy (status quo).

Option 2: Introduce additional criteria relating to vacancy and marketing the premises for redevelopment including an employment element.

Option 3: No plan scenario: Require no redundancy evidence.

#### Alternative Uses

Option 1: Restrict alternative uses for former ground floor office premises (outside of protected shopping frontages) in town centres (status quo)

Option 2: No plan scenario: Make no restriction on alternative uses for the ground floor of former office premises

### **COMMENTS**

### Redundancy Options

**6.39** Option 1 - This is predicted to strike a balance between providing for residential uses and offering some protection to offices and business use. However, the existing policy contains insufficient detail in that it does not address whether offices are vacant - a key indicator of demand and availability. Overall it does not reflect the current strategic and strong market demand for office/business uses in particular office and SME accommodation that meets current demand. The predicted effect in the medium to long term could be to reduce the economic base of the borough and therefore reduce the range of employment opportunities available, as well as impacting on both the strategic supply with the effect that demand could be displaced into adjoining boroughs creating pressure on rents and on land or sites allocated for other uses including housing.

**6.40** Option 2 - This provides the best overall score against the IIA objectives, scoring particularly high against IIA19: Provide employment space to meet the borough's needs and IIA20: Ensure people have access to suitable employment opportunities. In summary it improves the effectiveness of the existing policy by including vacancy as a key indicator of demand, whilst allowing flexibility for mixed-use redevelopment where this would encourage investment in the site and the re-provision of employment floorspace. In providing stronger protection for existing premises, this would reduce the need to travel to access employment opportunities (IIA18) and correspondingly a positive score against IIA7: Maintain and improve air quality is predicted.

**6.41** Option 3 (Redundancy Criteria) and Option 2 (Alternative Uses) are no plan scenarios. Outside of strategically protected industrial locations, this is not usually a strategic matter where the London Plan would be expected to guide development. Therefore a policy option without any policy requirements for evidence, redundancy, or an alternative use requirement for vacant ground offices, would not allow refusal of an application for change of use or redevelopment away for office/business uses and the likelihood is that the premises would become a residential use in perpetuity. The Council can demonstrate that it can exceed its housing targets without having to encourage development onto land protected for business use therefore, whilst this option may positively impact on objective IIA10: Provide more housing opportunities for Wandsworth residents and workers, the predicted overall effect will be a weakening of the borough's economic base reflected in strong negative impact against objective IIA19: Provide employment space to meet the borough's needs, IIA20: Ensure people have access to suitable employment opportunities; and a negative effect against the sustainability objectives IIA14: Addressing Council aspirations within priority neighbourhoods, and IIA12: Reduce poverty, social exclusion and health inequalities. In the medium to long term, the reduction in office/business space in Wandsworth may have a strategic impact in reducing supply. Negative scores against reducing the need to travel (to access employment opportunities) and a corresponding negative impact on air quality IIA7: Maintain and improve air quality, and IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy, are predicted. In the short to medium term there is likely to be a negative impact on adjoining boroughs by means of reduced supply, making it more difficult for other boroughs to have a planned approach to managing competing demand for housing and business uses.

### Alternative uses

**6.42** Option 1 - This status quo approach has the best overall score. In restricting alternative uses for former ground floor office premises (outside of protected shopping frontages) in town centres, this will continue to enable access to employment opportunities in the most sustainable locations and will ensure that the wider economy of those locations is not undermined by inappropriate uses. Additional criteria relating to marketing evidence before allowing any change of use may strengthen this approach. Impacts such as noise and disturbance on neighbouring properties through continued employment uses is addressed in DMPD Policy DMS1, and the use of relevant conditions. The effectiveness of this option and therefore an improved overall score could be achieved by extending protection to Local Centres outside the protected shopping frontages as some local centres do have small-scale offices and are well located for public transport.



## 7 Mitigation and Monitoring

### **Proposed mitigation measures:**

### **Proposals for mitigation and monitoring of the significant effects of Implementing the key Local Plan changes.**

**7.1** The SEA Directive states that:

**7.2** *The environmental report "shall monitor the significant effects of the implementation of plans and programmes in order... to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action." (Article 10.1)*

### **Mitigation of adverse effects and maximising the beneficial effects.**

**7.3** The appraisal analysis identified some broad themes of potentially adverse effects from the policy options relating to greater intensity of development particularly in the introduction of housing through mixed use development of industrial areas. The main adverse impacts were noise (as experienced by the new residential occupiers), consumption of resources including fossil fuels, and production of waste (though growth).

**7.4** It was also noted that options involving a 'no plan' option or those options proposing no restrictions on use could mean that new mixed use development, particularly the more vulnerable new residential and business uses, could locate in areas of high flood risk.

**7.5** Noise impacts may initially be predicted in proposed mixed use areas or areas transitioning from protected industrial areas to mixed use, particularly at the early stages where the majority of uses may be business and industrial uses that have not previously had to mitigate against potential residential neighbours. In the medium to long term, this effect is not predicted to continue. The main mitigation against the effects of noise and vibration from new development are Wandsworth Council Standard Conditions for planning applications regarding control of noise emissions, requiring submission and approval of details of insulation against external noise generated by a development, and details of soundproofing which require the submission and approval of noise insulation measures to provide effective resistance to the transmission of airborne and impact sound. In addition, Wandsworth Council has in place a service committed to offer assistance to combat noise nuisance, including through online reporting which may provide a mitigation solution for some residential and business occupiers especially in the short term.

**7.6** An increase in the quantum of development will inevitably generate a greater quantum of waste in the borough than the status quo and will result in a greater consumption of natural resources and fossil fuels. However new development will be subject to existing Local Plan policies and protocols which seek to reduce and recycle waste, and reduce carbon emissions (Core Strategy Policy IS2, and DMPD Policy DMS3).

**7.7** It was also noted that options involving a 'no plan' option or those options proposing no restrictions on use could mean that new mixed use development, particularly the more vulnerable new residential and business uses, could locate in areas of high flood risk. However, as this is only a partial review, the existing policy Local Plan Policies on Management of Flood Risk will continue to apply (DMPD Policies DMS5-7).

**7.8** In terms of maximising the beneficial effects of the policy options in the Local Plan review, the main vehicle where this will be achieved is planning obligations. The Council's Planning Obligations SPD aims to secure implementation and sets out details of how training and local employment commitments, community uses and social infrastructure will be secured.

**Monitoring:**

**7.9** In order to ensure that the impacts of the reviewed Local Plan are monitored, and that any significant effects can be measured, a set of indicators need to be established. As this is a partial review of the Local Plan, focusing on industry and employment policies, it is appropriate to set out indicators for those IIA objectives that relate directly to these issues, specifically:

- IIA19: Provide employment space to meet the borough's needs;
- IIA20: Ensure people have access to suitable employment opportunities.

**7.10** The relevant indicators for the adopted Local Plan sustainability appraisal have been used as a starting point for this, and revised and added to where required.

**7.11** It is relevant to note that the Scoping report identified a new objective which does relate in part to the industry and employment policies and policy options:

- IIA14: Address Council aspirations with priority neighbourhoods.

**7.12** Many of these neighbourhoods, such as parts of Battersea, Roehampton and Nine Elms, are proposed for higher intensity mixed use development which would give rise to new housing and employment opportunities which would benefit equality of opportunity and help to reduce poverty and social exclusion, as reported in section 6 and appendix 1. However, as regeneration of these priority neighbourhoods relies on the interaction of a wider range of policies therefore a review of the relevant indicators for this objective will be carried out as part of the full review of the Local Plan.

**7.13** The indicators relating to adopted policies which are not proposed to be replaced as part of the review will continue to be monitored in accordance with the adopted monitoring schedule, set out in appendix 1 of the adopted Core Strategy.

**7.14** The full details of the monitoring arrangements will be set out in the post-adoption statement. A monitoring schedule will be prepared to accompany the Proposed Submission version of the Local Plan Employment and Industry Document.

| <b>Adopted Local Plan indicators</b>  | <b>Proposed submission Local Plan review indicators</b>   | <b>Reason for amendment</b>  |
|---|---|--|
| Size of businesses in Wandsworth and regeneration areas   | Size of businesses in Wandsworth and regeneration areas   | <i>No change</i>   |
| Amount and percentage of floorspace (m2) available by type  | Amount and percentage of floorspace (m2) available by type  | <i>No change</i>   |
| Employment by employment category in Wandsworth and regeneration areas  | Employment by employment category in Wandsworth and regeneration areas  | <i>No change</i>   |
| Percentage change in the number of VAT and PAYE registered businesses births and deaths in Wandsworth and regeneration areas  | Percentage change in the number of VAT and PAYE registered businesses births and deaths in Wandsworth and regeneration areas  | <i>No change</i>   |
| Floorspace (m2) secured as flexible business floorspace B1a and B1b/c   | Floorspace (m2) secured as managed workspace  | Reflects the proposed policy option seeking flexible, managed workspace as part of new employment development          |
| <i>New indicator</i>  | Floorspace (m2) secured as affordable workspace   | Reflects the proposed policy option seeking affordable workspace   |
| Number of jobs created through new development in Nine Elms within the Central Activities Zone  | Number of jobs created through new development in Nine Elms within the Central Activities Zone  | <i>No change</i>   |
| Amount of commercial and employment floorspace completed, granted planning permission and in the development pipeline including percentage by location (SIL, LSIA, DMTS1, DMTS2, MUFIEA in Town Centres and Focal Points of Activity, Other MUFIEA, SIL in Stewarts Road Industrial Area, Town Centres, Local Centres, CAZ in Nine Elms and rest of the Thames Policy Area) | Amount of commercial and employment floorspace completed, granted planning permission and in the development pipeline including percentage by location (SIL (IBP, PIL), LSIA, Focal Points of Activity, Town Centres, Local Centres, CAZ in Nine Elms, Economic Use Intensification Areas, Employment Protection Areas, elsewhere in the borough) | To reflect the proposed policy options establishing employment protection areas and economic use intensification areas |

## **Uncertainties and Risks**

**7.15** Uncertainties and risks remain largely the same as those set out in the sustainability reports accompanying the adopted Local Plan documents. New risks and uncertainties relating to the performance and impacts of the proposed policy options can be envisaged through the forthcoming new London Plan which is at a very early stage of preparation, and as signalled in the Employment and Industry Review policy options document, the impact of the decision to leave the European Union on London's economy, population and growth. Initial impacts included a fall in the value of sterling, the value of shares and the cessation of trading by commercial property investment trusts. The longer term impacts on the economy and subsequent effect on the demand for employment land in London and Wandsworth are unknown. In context however it should be noted that the lifetime of a development plan is typically 15 years, and it can be reasonably envisaged that the economy could be impacted by a range of unknown factors in addition to leaving the EU. Furthermore, as set out in the NPPF, local plan policies are expected to have a degree of flexibility so that local plans can respond to changes in economic circumstances.

## 8 Next steps

**8.1** The detailed timetable for the Employment and Industry Local Plan Document in the non-technical summary of this IIA report and key stages of the production of the Document is described in section 4. It is proposed that public consultation on this IIA report will take place alongside consultation on the Proposed Submission (Regulation 19) version of the Local Plan Review which seeks views on the 'soundness' of the proposed policies, as set out in the NPPF. This will take place between March and April 2017 in accordance with the Town and Country (Local Planning) (England) Regulations 2012.

**8.2** Comments received will be considered and may require a new IIA report or an IIA statement (depending on the degree of changes to the IIA required or if additional new or significant changes to policies arise from consultation). The new report or statement will be submitted for public examination, alongside this IIA, to the Secretary of State.

## Appendix 1 IIA Detailed appraisals of the (Policy) Options for the Partial Review (Industrial and Employment Land) Revision to the Wandsworth Local Plan

**This section comprises SEA/SA Stages B3 AND B4: Predicting the effects of the Plan and its alternatives; and Evaluating the effects of the plan and its alternatives**

Section 6 of the main report provided a detailed analysis of the main outcomes predicted in the appraisal tables below.

| KEY TO ASSESSMENT EVALUATION TABLES    |   |  |
|--|---|--|
|  | ASSESSMENT/PREDICTED EFFECTS  |  |
| IIA 12-14 Equalities Impact Assessment | Overall Score:<br>Green = positive<br>Amber = neutral<br>Red = negative | + Minor positive effect<br>++ Major positive effect                        |
| IIA15-16 Health Impact Assessment      |   | – Minor negative effect<br>– –Major negative effect<br>0 Neutral/no effect |

| <b>EI2 - Protecting and Re-designating Industrial Land (B2-B8 uses)</b>  |          |          |          |           |            |          |          |            |
|--|----------|----------|----------|-----------|------------|----------|----------|------------|
| Option 1: Protect all existing industrial land (whether currently protected or not), including remaining industrial land in Nine Elms and MUFIEAs, smaller industrial clusters (eg Jaggard Way) and undesignated sites (eg railway arches) |          |          |          |           |            |          |          |            |
| Option 2: Protect all land currently protected as SIL or LSIA (status quo )  |          |          |          |           |            |          |          |            |
| Option 3: Protect the land identified as SIL or LSIA but not Bendon Valley bingo hall or Wandsworth gas holder   |          |          |          |           |            |          |          |            |
| Option 3a: as for 3 but with additional mitigating protections for other existing industrial land (eg Jaggard Way, railway arches) meaning they will be protected unless redundant.  |          |          |          |           |            |          |          |            |
| Option 3b: as for 3a but with additional surrounding sites re-designated to mixed use, ie Frogmore depot, Riverside business centre  |          |          |          |           |            |          |          |            |
| Option 4: Promote mixed use re-development in LSIA's provided industrial floorspace is re-provided and that employment floorspace for SMEs is provided alongside residential providing for different parts of the local economy            |          |          |          |           |            |          |          |            |
| Option 5: Promote a mix of uses in SIL and LSIA with re-provision of any employment-generating use (not just industrial) and planned redevelopment of these areas (ie MUFIEA plus area spatial strategy approach)                          |          |          |          |           |            |          |          |            |
| Option 5a: As above but with re-provision of any B class use   |          |          |          |           |            |          |          |            |
| Option 6 No plan scenario: No policy control and no designation of areas for protection of B2-B8 uses  |          |          |          |           |            |          |          |            |
|  | <b>1</b> | <b>2</b> | <b>3</b> | <b>3a</b> | <b>3 b</b> | <b>4</b> | <b>5</b> | <b>5 a</b> |
| IIA1: Avoid loss of designated ecological sites, priority habitats and species   | 0        | 0        | 0        | 0         | 0          | 0        | 0        | 0          |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough  | 0        | 0        | 0        | +         | +          | 0        | 0        | 0          |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains            | 0        | 0        | 0        | 0         | 0          | 0        | 0        | 0          |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure   | 0        | 0        | 0        | 0         | 0          | +        | 0        | 0          |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy  | 0        | 0        | 0        | -         | -          | -        | -        | -          |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy   | 0        | 0        | 0        | -         | -          | -        | -        | -          |
| IIA7: Maintain and improve air quality   | 0        | 0        | 0        | +         | +          | -        | -        | -          |
| IIA8: Promote renewable and low carbon energy generation   | 0        | 0        | +        | +         | +          | ++       | ++       | ++         |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS   | 0        | 0        | +        | +         | +          | ++       | ++       | ++         |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers   | -        | -        | +        | +         | +          | ++       | ++       | ++         |
| IIA11: Ensure people have access to essential community services and facilities, including open space  | 0        | 0        | +        | +         | +          | +        | +        | +          |

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|   |    |    |   |    |    |    |    |    |
|---|----|----|---|----|----|----|----|----|
| IIA12: Reduce poverty, social exclusion and health inequalities   | +  | +  | + | +  | +  | -  | -  | -  |
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief | 0  | 0  | 0 | 0  | 0  | 0  | -  | 0  |
| IIA14: Address Council aspirations within priority neighbourhoods   | -  | 0  | 0 | 0  | 0  | 0  | 0  | 0  |
| IIA15: Protect and improve public health  | 0  | 0  | 0 | +  | +  | 0  | 0  | -  |
| IIA16: Reduce the impact of noise   | 0  | 0  | 0 | 0  | 0  | 0  | 0  | -- |
| IIA17: Encourage the growth of sustainable transport  | 0  | 0  | 0 | 0  | 0  | -- | -- | -- |
| IIA18: Reduce the need to travel  | 0  | 0  | 0 | 0  | 0  | 0  | 0  | 0  |
| IIA19: Provide employment space to meet the borough's needs   | +  | ++ | + | +  | +  | +  | -- | -  |
| IIA20: Ensure people have access to suitable employment opportunities   | ++ | ++ | + | ++ | ++ | +  | +  | +  |

**SUMMARY**

Options 3a and 3b are predicted to have the best overall score against the IIA objectives

Option 6: For the 'no plan' scenario, protection of industrial uses would rely on the London Plan policies which have already been subject to SA therefore it is not relevant to carry out any further assessment.



| <b>EI3 – Protecting office floorspace</b>   |          |          |          |          |          |
|---|----------|----------|----------|----------|----------|
| Option 1: Protect offices in town centres and the Thames Policy Area (status quo)   |          |          |          |          |          |
| Option 2: Protect offices in town centres, focal points, small clusters near transport interchanges, edge-of-centre areas   |          |          |          |          |          |
| Option 3: Protect all remaining offices in the borough  |          |          |          |          |          |
| Option 4 Protect offices only in town centres and edge of centre locations and seek to maximise new housing potential on sites elsewhere  |          |          |          |          |          |
| Option 5 No plan scenario: Do not have a policy protecting office floorspace  |          |          |          |          |          |
|   | <b>1</b> | <b>2</b> | <b>3</b> | <b>4</b> | <b>5</b> |
| IIA1: Avoid loss of designated ecological sites, priority habitats and species  | 0        | 0        | 0        | 0        | 0        |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough   | +        | +        | +        | -        | 0        |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains | +        | +        | +        | 0        | 0        |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure  | 0        | 0        | 0        | -        | 0        |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy   | 0        | 0        | -        | -        | 0        |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy  | 0        | 0        | 0        | -        | 0        |
| IIA7: Maintain and improve air quality  | 0        | +        | -        | -        | --       |
| IIA8: Promote renewable and low carbon energy generation  | 0        | +        | -        | +        | 0        |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS  | 0        | 0        | -        | 0        | 0        |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers  | -        | -        | --       | ++       | +        |
| IIA11: Ensure people have access to essential community services and facilities, including open space   | 0        | 0        | 0        | -        | 0        |
| IIA12: Reduce poverty, social exclusion and health inequalities   | 0        | +        | +        | -        | --       |
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief   | 0        | 0        | 0        | 0        | 0        |
| IIA14: Address Council aspirations within priority neighbourhoods   | +        | +        | 0        | -        | --       |
| IIA15: Protect and improve public health  | 0        | 0        | 0        | 0        | 0        |
| IIA16: Reduce the impact of noise   | 0        | +        | -        | -        | 0        |

|  |    |    |    |    |    |
|--|----|----|----|----|----|
| IIA17: Encourage the growth of sustainable transport                       | 0  | +  | -- | 0  | 0  |
| IIA18: Reduce the need to travel   | +  | ++ | 0  | -  | -- |
| IIA19: Provide employment space to meet the borough's needs                | +  | ++ | -- | +  | -- |
| IIA20: Ensure people have access to suitable employment opportunities      | ++ | ++ | +  | ++ | -- |
| <b>SUMMARY</b>   |    |    |    |    |    |
| The results indicate that Option 2 scores best against the IIA objectives. |    |    |    |    |    |

| <b>EI4 – Meeting demand for new employment floorspace</b>   |          |          |          |          |           |          |
|---|----------|----------|----------|----------|-----------|----------|
| Option 1: Support the development of large-scale offices in Nine Elms, as per the VNEB OA and adopted Local Plan (status quo), to meet demand for c. 200,000 sq ms of floorspace  |          |          |          |          |           |          |
| Option 2: Intensify requirement for large-scale office floorspace in Nine Elms to meet additional demand on remaining sites   |          |          |          |          |           |          |
| Option 3: Scale back development in Nine Elms and spread more evenly across the borough’s 5 town centres  |          |          |          |          |           |          |
| Option 4: Identify specific sites to meet the demand for office floorspace for local and sub-regional office market, prioritising town centres then edge-of-centre then out-of-centre sites                                     |          |          |          |          |           |          |
| Option 4a As above but without prioritising any specific areas  |          |          |          |          |           |          |
| Option 5: No plan scenario: Expect to meet office floorspace for local and sub-regional office market without identifying specific sites, relying on windfall development   |          |          |          |          |           |          |
|   | <b>1</b> | <b>2</b> | <b>3</b> | <b>4</b> | <b>4a</b> | <b>5</b> |
| IIA1: Avoid loss of designated ecological sites, priority habitats and species  | 0        | 0        | 0        | 0        | 0         | 0        |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough   | +        | 0        | 0        | +        | 0         | 0        |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains | +        | 0        | -        | +        | 0         | 0        |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure  | 0        | 0        | -        | 0        | 0         | -        |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy   | -        | --       | +        | -        | -         | -        |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy  | -        | --       | +        | -        | -         | -        |
| IIA7: Maintain and improve air quality  | +        | -        | -        | ++       | --        | --       |
| IIA8: Promote renewable and low carbon energy generation  | +        | +        | 0        | +        | +         | 0        |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS  | +        | +        | 0        | +        | 0         | 0        |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers  | 0        | -        | -        | +        | 0         | -        |
| IIA11: Ensure people have access to essential community services and facilities, including open space   | 0        | -        | -        | 0        | 0         | -        |
| IIA12: Reduce poverty, social exclusion and health inequalities   | +        | +        | -        | +        | --        | --       |

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|   |   |    |    |    |    |    |
|---|---|----|----|----|----|----|
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief | 0 | 0  | 0  | 0  | 0  | 0  |
| IIA14: Address Council aspirations within priority neighbourhoods   | + | +  | -  | ++ | -- | -- |
| IIA15: Protect and improve public health  | 0 | 0  | 0  | ++ | 0  | 0  |
| IIA16: Reduce the impact of noise   | 0 | -  | 0  | 0  | 0  | -- |
| IIA17: Encourage the growth of sustainable transport  | 0 | 0  | 0  | 0  | 0  | -  |
| IIA18: Reduce the need to travel  | + | -- | -- | +  | -- | -- |
| IIA19: Provide employment space to meet the borough's needs   | + | ++ | -- | ++ | +  | -- |
| IIA20: Ensure people have access to suitable employment opportunities   | + | +  | -- | ++ | +  | -- |
| <b>SUMMARY</b>  |   |    |    |    |    |    |
| The results indicate that Option 4 scores best against the IIA objectives.  |   |    |    |    |    |    |

| <b>E15 – New employment development</b>   |          |           |          |          |
|---|----------|-----------|----------|----------|
| <ul style="list-style-type: none"> <li>Option 1: Set specific requirements for new development (status quo)</li> <li>Option 1a: as for 1 but with additional requirements for the applicant of large-scale mixed use schemes to demonstrate that employment and residential uses complement one another</li> <li>Option 2: Require the applicant to demonstrate that the site would work successfully as an employment use</li> <li>Option 3 No plan scenario: Do not set specific requirements for new employment development</li> </ul> |          |           |          |          |
|   | <b>1</b> | <b>1a</b> | <b>2</b> | <b>3</b> |
| IIA1: Avoid loss of designated ecological sites, priority habitats and species  | 0        | 0         | 0        | 0        |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough   | 0        | 0         | 0        | 0        |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains   | 0        | 0         | 0        | 0        |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure  | 0        | 0         | 0        | 0        |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy   | 0        | 0         | 0        | 0        |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy  | 0        | 0         | 0        | 0        |
| IIA7: Maintain and improve air quality  | 0        | ++        | --       | --       |
| IIA8: Promote renewable and low carbon energy generation  | 0        | +         | +        | +        |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS  | 0        | +         | +        | +        |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers  | 0        | +         | +        | +        |
| IIA11: Ensure people have access to essential community services and facilities, including open space   | 0        | 0         | 0        | 0        |
| IIA12: Reduce poverty, social exclusion and health inequalities   | 0        | 0         | +        | +        |
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief   | +        | +         | -        | -        |
| IIA14: Address Council aspirations within priority neighbourhoods   | +        | +         | 0        | 0        |
| IIA15: Protect and improve public health  | 0        | +         | --       | --       |
| IIA16: Reduce the impact of noise   | 0        | ++        | ++       | 0        |

|   |   |    |   |    |
|---|---|----|---|----|
| IIA17: Encourage the growth of sustainable transport  | 0 | 0  | 0 | 0  |
| IIA18: Reduce the need to travel  | + | ++ | - | -- |
| IIA19: Provide employment space to meet the borough's needs   | + | ++ | - | -- |
| IIA20: Ensure people have access to suitable employment opportunities   | + | ++ | - | -- |
| <b>SUMMARY</b>  |   |    |   |    |
| The results indicate that Option 1a scores best against the IIA objectives. It maximised the potential of land for employment uses but includes sufficient detail to avoid or mitigate adverse impacts on the environment, on housing supply and potential, and manages conflicting uses. |   |    |   |    |

**EI6 – Affordable, creative and flexible workplaces**

- Option 1: No plan scenario: Require no specifically affordable workspace, ie allow the market to set rates for all economic uses and dictate how workspace is managed
- Option 2: Require realistic rents, flexible leasing arrangements and encourage developers to come forward with development partners to manage flexible employment floorspace (status quo)
- Option 3: Require rents at a specific level in relation to market rates (eg 80%) for a proportion of a scheme on large (>1,000 sq ms) employment development, secured through s106
- Option 4: Require a specific managed workspace provider to be secured through s106 on large (>1,000 sq ms) employment development for (at least) a proportion of the scheme, including evidence of how they cater for SMEs and provide affordable workspace (using a management plan, secured through the Local Employment Agreement)
- Option 5: Require major regeneration initiatives to provide employment floorspace
- Option 6: Encourage the employment, training and support of local labour and commercial opportunities for existing Wandsworth businesses, to include training, and employment opportunities for local residents as well as the provision of flexible and affordable workspace and supply chain opportunities for local businesses.

|   | 1  | 2 | 3 | 4  | 5  | 6  |
|---|----|---|---|----|----|----|
| IIA1: Avoid loss of designated ecological sites, priority habitats and species  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough   | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy   | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA7: Maintain and improve air quality  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA8: Promote renewable and low carbon energy generation  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA11: Ensure people have access to essential community services and facilities, including open space   | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA12: Reduce poverty, social exclusion and health inequalities   | -- | + | + | ++ | ++ | ++ |

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|   |    |   |   |    |    |    |
|---|----|---|---|----|----|----|
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief | 0  | + | 0 | +  | +  | +  |
| IIA14: Address Council aspirations within priority neighbourhoods   | -  | + | 0 | ++ | +  | ++ |
| IIA15: Protect and improve public health  | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA16: Reduce the impact of noise   | 0  | 0 | 0 | 0  | 0  | 0  |
| IIA17: Encourage the growth of sustainable transport  | -  | 0 | 0 | 0  | 0  | 0  |
| IIA18: Reduce the need to travel  | -- | + | + | ++ | +  | +  |
| IIA19: Provide employment space to meet the borough's needs   | -- | + | + | ++ | ++ | ++ |
| IIA20: Ensure people have access to suitable employment opportunities   | -- | + | + | ++ | +  | ++ |

**SUMMARY**

The results indicate that Option 4 scores best against the IIA objectives, however the predicted results to Option 6 indicate that this could be a sustainable "second best" option



| <b>E18 – Redundancy of employment premises</b>   |          |          |          |            |            |
|--|----------|----------|----------|------------|------------|
| <ul style="list-style-type: none"> <li>• Option 1: Set redundancy requirements as per current policy (status quo)</li> <li>• Option 2: Introduce additional criteria relating to vacancy and marketing the premises for redevelopment including an employment element</li> <li>• Option 3: No plan scenario: Require no redundancy evidence</li> </ul> |          |          |          |            |            |
| <b>Alternative Uses</b>  |          |          |          |            |            |
| <ul style="list-style-type: none"> <li>• Option 1: Restrict alternative uses for former ground floor office premises (outside of protected shopping frontages) in town centres (status quo)</li> <li>• Option 2: No plan scenario: Make no restriction on alternative uses for the ground floor of former office premises</li> </ul>                   |          |          |          |            |            |
|  | <b>1</b> | <b>2</b> | <b>3</b> | <b>AU1</b> | <b>AU2</b> |
| IIA1: Avoid loss of designated ecological sites, priority habitats and species   | 0        | 0        | 0        | 0          | 0          |
| IIA2: Protect and enhance the natural environment, geodiversity and biodiversity of the borough  | 0        | 0        | 0        | 0          | 0          |
| IIA3: Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment, including buildings, areas, structures, landscapes, townscapes, important views and archaeological remains  | 0        | 0        | 0        | 0          | 0          |
| IIA4: Enhance the benefits to all from biodiversity and ecosystem and establish and retain inter-connected multi-functional green infrastructure   | 0        | 0        | 0        | 0          | 0          |
| IIA5: To minimise consumption of natural, particularly virgin non-renewable, resources and energy  | 0        | +        | 0        | +          | 0          |
| IIA6: To minimise the generation of waste in accordance with the principals of the resource efficiency hierarchy   | 0        | 0        | 0        | 0          | 0          |
| IIA7: Maintain and improve air quality   | 0        | +        | -        | +          | -          |
| IIA8: Promote renewable and low carbon energy generation   | 0        | 0        | 0        | 0          | 0          |
| IIA9: Minimise flood risk in the borough and elsewhere and promote the use of SuDS   | 0        | 0        | 0        | 0          | 0          |
| IIA10: Provide more housing opportunities for Wandsworth residents and workers   | +        | 0        | +        | 0          | 0          |
| IIA11: Ensure people have access to essential community services and facilities, including open space  | 0        | 0        | -        | 0          | 0          |
| IIA12: Reduce poverty, social exclusion and health inequalities  | 0        | +        | -        | +          | -          |
| IIA13: Ensure equality for everyone regardless of disability, age, race/ethnicity, age, sexuality, religion or belief  | 0        | +        | 0        | 0          | 0          |

|  |   |    |    |    |    |
|--|---|----|----|----|----|
| IIA14: Address Council aspirations within priority neighbourhoods  | + | +  | -- | +  | -  |
| IIA15: Protect and improve public health   | + | +  | -  | 0  | -  |
| IIA16: Reduce the impact of noise  | 0 | 0  | 0  | -  | -  |
| IIA17: Encourage the growth of sustainable transport   | 0 | 0  | 0  | 0  | 0  |
| IIA18: Reduce the need to travel   | + | ++ | -  | ++ | -- |
| IIA19: Provide employment space to meet the borough's needs  | + | ++ | -- | +  | -- |
| IIA20: Ensure people have access to suitable employment opportunities  | - | ++ | -- | ++ | -- |
| <b>SUMMARY</b>   |   |    |    |    |    |
| The results indicate that Option 2 (Redundancy of employment premises) and Option1 (Alternative uses) score best against the IIA objectives. |   |    |    |    |    |



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