

Wandsworth Local Plan

Employment and Industry Document

SD/005 Appendix 1 - Full copies of all Original Policy Options consultation responses made between 7 October 2016 - 4 November 2016 and Council Consultation Letters and Memos





NICHOLAS TAYLOR + ASSOCIATES
TOWN PLANNING CONSULTANTS

31 Windmill Street, London W1T 2JN
T. 020 7636 3961
F. 020 7636 8131
E. info@ntaplanning.co.uk
W. www.ntaplanning.co.uk

Dear Sirs,

LOCAL PLAN: EMPLOYMENT LAND REVIEW OCTOBER 2016
38 HAVELOCK TERRACE, LONDON SW8 4AL

Our interest lies with Nos.38 and 48 Havelock Terrace.

The following statement is provided in response to the below questions set out in the Councils Employment Land Review – Policy Options Consultation (October 2016) and on behalf of the owners of 38 and 48 Havelock Terrace.

Question 4

Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area?

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

Question 49

Are there other designations that would be more appropriate for the Havelock Terrace area?

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

Question 51

Should the Local Plan allow residential uses in any part of the SIL?

Question 53

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

The National Planning Policy Framework, published March 2012, sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development, which means that local planning authorities should positively seek opportunities to meet the development needs of their area and should usually meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

Paragraphs 21 and 22 of the NPPF state that in drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

The NPPF requires local planning authorities to produce a Local Plan for its area (para 153) and allows for this to be reviewed to respond flexibly to changing circumstances. Local Plans should be aspirational but realistic (para 154) and should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.

In summary, whilst we fully support the continued protection of industrial land, this protection needs to be more flexible and modified. We provide justification below:

We note that the policy and the wider review of the employment local plan have been informed by various evidence sources, but in particular a new Employment Land and Premises Study (ELPS) commissioned from AECOM. The primary findings of the study are that office-based employment is expected to grow from 13,000 jobs to 14,900 jobs, whilst employment based in industrial premises will contract from 13,300 jobs to 11,400 jobs, to 2030.

In terms of the increased office demand, the AECOM study suggests that this would result in the region of at least 31,700m² of new office space orientated towards local/sub-regional markets.

Whilst the findings of the ELPS indicates that the borough will need to retain a significant quantity of industrial land in order to meet the potential forecast demand for industrial uses, storage, transport, waste and related infrastructure over the next 15 years, there is a requirement to meet the significant uplift in non-industrial B-Class employment floorspace.

The Havelock Terrace/Southside Industrial Estate forms a protrusion of the SIL north of the railway line serving London Waterloo, with land and premises here are presently well-used. The opening of the Northern Line Extension station at Battersea Power Station will further increase the PTAL of the industrial area. The improved accessibility the new station offers and the provision of retail, leisure and social infrastructure through the redevelopment of VNEB OA is likely to attract demand from higher-value industrial or office uses to this location.

To help meet wider strategic objectives and market predictions made by AECOM, whilst also promoting higher density development at accessible locations, we urge the Council to consider promoting intensification of a portion of the Queenstown Road SIL at Havelock Terrace. This should include higher density employment uses (e.g. Use Classes B1a/b, and not limited only to industrial uses (B1c, B2, B8 and Sui Generis), which are complementary uses to any safeguarded uses under SIL.

As set out in the AECOM report, the supply of industrial land in LB Wandsworth has contracted over the past 15 years and in particular over the past five years. We note that contraction means that there are fewer sites which can accommodate industrial activities so in theory the Council should look to intensify industrial provision on existing sites, where suitable. However, the Havelock Terrace area of the Queenstown Road (SIL) is a well-used area of the SIL containing a mix of traditional occupiers in good/average quality premises. Though the area is considered typical of the character found elsewhere in the SIL, it juts out from the core area of the SIL being the only portion located north of the railway lines into Vauxhall/London Waterloo, and thus is to some degree separated from it.

As set out in the AECOM report, the Havelock Terrace benefits from its own access road, it experiences less of the access and permeability issues encountered in other parts of the SIL. Notably, the area lies in close proximity to Battersea Park Station to its west along the A3205, with Queenstown Road station a short distance beyond this. The construction of the Northern Line Extension with its terminus station at Battersea Power Station will also result in another link to central London being installed a short distance to the north-west, thus improving further the good public transport access that this portion of the SIL currently benefits from.

The provision of high quality office floorspace nearby at Battersea Power Station and further east within Nine Elms is resulting in the employment make-up of the area local to Havelock Terrace changing significantly from its mostly departed industrial focus. The Havelock Terrace area, including 38 and 48 Havelock Terrace would make a welcome contribution to this new character that is quickly being established.

Accordingly, we wholly agree with the conclusions of the AECOM report commissioned by Wandsworth Council, and the Council should seriously consider changing the designation of Havelock Terrace within the SIL framework from Preferred Industrial Location to Industrial Business Park or similar. This would allow for and help facilitate the location of higher density employment uses at this location, whilst maintaining complementary business uses in this location adjacent to the main body of the SIL which would benefit from its continued protection.

The relaxation of the Strategic Industrial Land allocation will enable redevelopment for other uses, without such release other regeneration objectives are likely to be hampered. In this regard we are aware of high level discussions within the Council for the strategic redevelopment of this part of the Queenstown Road Strategic Industrial Location, which is already in progress.

More specifically, under current planning application 2016/5422, involving the site at Palmerston Court (*comprising Palmerston Way Battersea London SW8 4AJ 1-3 Havelock Terrace Battersea London SW8 4AS The Pavilion Public House 1 Bradmead London SW8 4AG and Flanagan's of Battersea Public House 133 Battersea Park Road London SW8 4AG*), demolition of all existing buildings is proposed to allow the construction of 4 buildings ranging from 9 to 18 storeys in height, comprising 174 residential units; office (B1) accommodation; drinking establishment (A4); and flexible retail (A1/A2/A3) uses.

This site sits against the northern boundary of the SIL, and in fact was only itself recently removed from the SIL. As set out within the DAS submitted as part of the application, the masterplan for the development seeks to unlock and connect the site to the Nine Elms Regeneration area to the north with a new public realm composed of a series of public spaces plugged to a central spine facilitating a new link to future redevelopment to the rear (south), i.e. Havelock Terrace.

The submission acknowledges that the land to the south of Palmerston Court is currently designated as Strategic Industrial Location. However, the applicants undertook a masterplan study in consultation with LB Wandsworth to illustrate and consider the potential for future developments. The masterplan proposals submitted under the application have no status at this stage, however they do provide the context of the proposed redevelopment of Palmerston Court, illustrating that the scheme design does not compromise future, nor current, development on the wider site.

In light of the above, the timing of the employment land review provides a significant opportunity to enable redevelopment of the immediate area for other compatible uses for which there is an identified needs (e.g. offices); without such release these regeneration objectives are likely to be hampered.

In conclusion, we entirely endorse the recommendations of the ELPS, given the extent of change to the areas surrounding the Havelock Terrace part of the SIL, and in particular the increased connectivity that will be provided by the Northern Line extension. This area has the potential to provide a significant increase in employment floorspace and should be re-designated as an Industrial Business Park or similar in order to capitalise on these changes and to enable the development of a wider mix of business uses including B1b (research and development) and B1a (offices) alongside retained or replaced industry and distribution functions. The change in this area has already been catalysed by the submission of the large scale major redevelopment at the northern end of Havelock Terrace – Palmerston Court. The proposals submitted set out the high level strategic masterplan for this northern spur of the SIL/Havelock Terrace which appear to go hand in hand with the recommendations of the ELPS .



Jones Lang LaSalle Ltd
30 Warwick Street London W1B 5NH
+44 (0)20 7493 4933

www.jll.co.uk

Policy and Design Team
Planning and Transport Division
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

Your ref
Our ref 486500/LON
Direct line 020 7399 5409
guy.bransby@eu.jll.com

Via Email and Post

31 October 2016

Dear Sir/Madam,

AMEC STAFF PENSIONS TRUSTEE LIMITED (C/O LASALLE INVESTMENT MANAGEMENT) | EMPLOYMENT AND INDUSTRY LOCAL PLAN (EILP) REVIEW

We are writing on behalf of our client, Amec Staff Pensions Trustee Limited (c/o LaSalle Investment Management), to submit representations on the Employment and Industry Local Plan (EILP) Review.

Whilst Amec Staff Pensions Trustee Limited welcomes the principle of the Employment and Industry Local Plan (EILP) Review, we comment specifically in relation to 37 Lombard Road, Wandsworth, London SW11 3RW (herein referred to as 'the site'). We will firstly set out the context of the site before commenting specifically on it in relation to the EILP. A site location plan has been included at **Appendix 1** of this letter for reference.

Description of the Site

The Site is located within the administrative boundary of the London Borough of Wandsworth ('LBW').

The site is currently occupied by a Travis Perkins store (builder's merchant) with associated offices and warehouses. There are three low rise buildings (1 to 2 storeys) on the site plus ancillary yard space, one retail warehouse and two industrial units. The site has associated car parking for approximately 37 vehicles.

On the basis that all three units are in use by Travis Perkins, the current land use is likely to be B8 (and / or A1 use where there are retail sales on the premises).

The existing buildings were permitted in 1983. The Planning Permission (Application Reference: Unknown) is as follows:

“Erection of one-storey non-food retail warehouse (1,125sqm), part one / part two storey industrial unit (2,217sqm) and one storey industrial unit (322sqm); provision of 37 parking spaces with vehicular access from Lombard Road.”

Planning Permission (Application Reference: 23/05/1988) was approved for *“Use as a builder’s merchants, including store/office on Harroway Road frontage, open store and lean-to-stores. Condition 2 of this application states that “the storage accommodation hereby approved shall be used only as a builders merchants and for no other purpose within Class A1 or Class B8 of the Town and Country Planning Use Classes Order 1987.”*

The site is bounded by Gwynne Road, Lombard Road and Harroway Road and can be accessed from the latter two roads. To the east of the site lies Harroway Gardens an area of local and publically accessible open space.

The overall site ownership, for the land and buildings, extends to 0.6 hectares in footprint. Please find a site location plan at **Appendix 1**. Photographs of the site are provided below (**Figure 1**).



Figure 1 – Images of the Site

Description of Surroundings

The site is located on the eastern side of Lombard Road. The site lies approximately 100 metres to the east of the River Thames, along which there are a number of modern, high density residential developments of between 5-24 storeys.

The surrounding area is characterised by a mix of uses. These include a Big Yellow Self Storage, Halfords and Pets at Home to the south of the site. Harroway Gardens is located east of the site, providing a focal point for Battersea's growing population. A self-storage warehouse and retail area are located to the north of the site on Gwynne Road. Oyster Wharf, a 9 storey residential development is located to the west.

The site has good transport connections; the Public Transport Accessibility Level (PTAL) for the site varies between 2 and 3. Clapham Junction Station, which provides services to the south-east and south-west of England, is a 12 minute walk from the site. The site is also served by a number of bus routes (319, 345, 44, 344, 49, 170, 295 and C3). However, the PTAL rating for the site should improve when the proposed pedestrian footbridge to Imperial Wharf Station is open and Crossrail 2 arrives in the area from 2030.

Planning Context

The site is allocated within LBW's Local Plan – Site Specific Allocations Document (adopted March 2016) and the Lombard Road/York Road Riverside Focal Point Supplementary Planning Document (adopted December 2015) for “*mixed use development incorporating replacement employment floorspace and residential use*” (Policies Map Reference Number: 112 and 12).

The Policies Map (adopted March 2016) also designates the site as **(Figure 2)**:

- A Focal Point of Activity (Core Strategy Policy PL9 and DMPD Policy DMO8).
- A Mixed Use Former Industrial Employment Area (MUFIEA) (Core Strategy Policy PL6 and DMPD Policy DMI2a). In MUFIEA's, mixed use redevelopment including residential is promoted and replacement of existing employment floorspace is required (DMDP Policy DMI2).
- An Archaeological Priority Zone (DMPD Policy DMS2).
- Flood Zone 3a (greater than 1 in 100 probability of river flooding (>1%) and greater than 1 in 200 (>0.5%) probability of flooding from the sea in any year) and Flood Zone 2 (between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1%-0.1%), or between 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5-0.1%) in any year).
- A Decentralised Energy Opportunity Area (CS Policy IS2; DMPD Policy DMS3).
- There are no nationally or locally listed buildings on the site and it is not located within a Conservation Area. Battersea Square Conservation Area lies to the north.

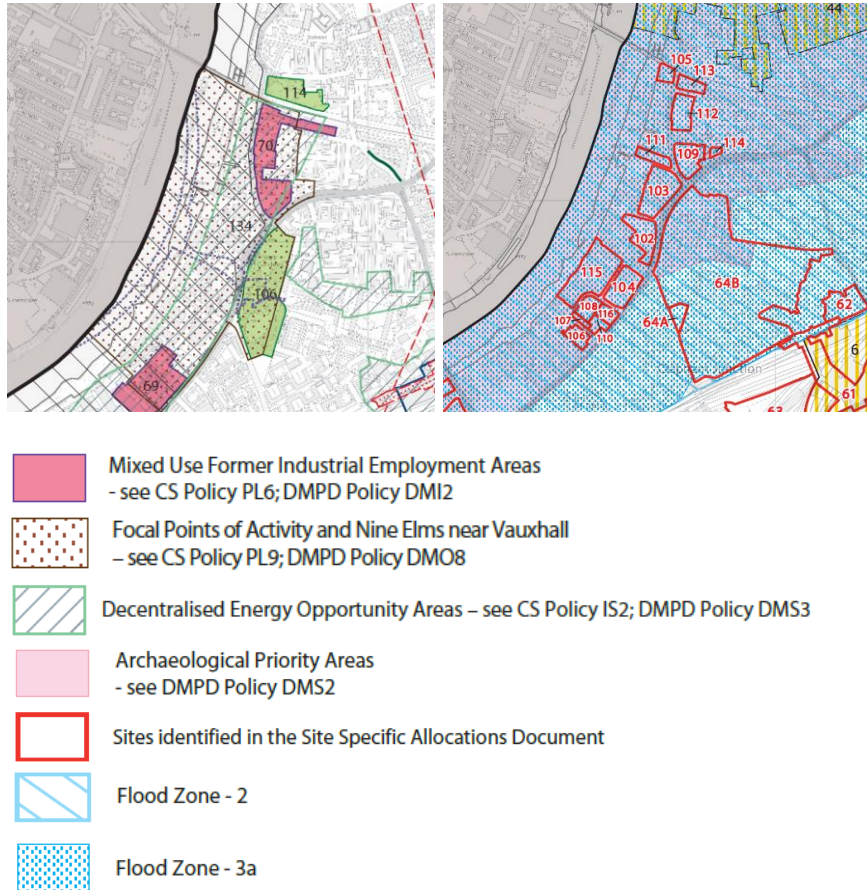


Figure 2 – Policies Map (adopted March 2016)

Local Plan: Employment and Industry Review

The Employment Land and Premises Study (2016) projects that the balance between supply and demand for industrial land in the borough up to 2030 could reduce for industrial land by 9.5 hectares (in a low growth scenario) or increase demand for industrial land by 8.2 in a high growth scenarios. In the adopted Local Plan there is 141.9 hectares of protected industrial land.

The Study also identifies that the Lombard Road “*cluster has areas of poor and very poor environmental and build quality, predominantly in locations with older industrial premises, warehouses, or workshops. Redevelopment of the remaining industrial premises within the cluster would allow for intensification of activities, possibly to provide additional purpose built SME workspace or office premises (near the existing SME estates within the cluster).*”

The Employment and Industry Review Policy Options Document (October 2016) identifies that Mixed Use Former Industrial Employment Areas (MUFIEAs) were initially designated with the adoption of the original Core Strategy in 2010 and the DMPD in 2012, at which time the Employment and Premises Study by DTZ (2010) identified an adequate supply of employment premises in the



borough to meet demand. Whilst some MUFIEAs have been redeveloped, others still contain substantial quantities of industrial/distribution floorspace that have not been developed since the MUFIEA was introduced or have identified redevelopment projects in the pipeline. Moreover, the document goes on to state that in March 2016 the Lombard Road/York Road Riverside Focal point was designated, as a result all existing MUFIEAs are designated within or partially within a focal point or town centre. The wider aim for town centres, focal points and MUFIEAs is for continued priority release for non-industrial uses.

As set out above, our client's site is designated as a MUFIEA and is located within the Lombard Road/York Road Riverside Focal Point, where current planning policy (Policy DMI2) encourages mixed use development (including a residential component) providing that:

- *“Net employment floorspace equivalent to at least existing employment space is provided (and in particular flexible floorspace catering for small and medium sized enterprises;*
- *New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment land; and*
- *Existing surrounding uses will not have an adverse impact on the amenity of new residential space.”*

In accordance with the adopted policy framework for the site, the client has appointed a project team and begun to work up a mixed use scheme. This has included a series of Pre-application meetings with LBW Planning and Highways Officers, Officers at the GLA and two presentations to Councillor Ravi Govindia.

In light of the above and our client's intention to redevelopment the site, we consider that the Local Plan should continue to allow the loss of industrial and distribution uses in the MUFIEA areas for the following reasons:

- The NPPF sets out a presumption in favour of sustainable development and supports economic growth, as well as housing. The redevelopment of brownfield employment land is considered to represent sustainable development in accordance with the NPPF.
- The London Plan seeks to ensure that sufficient industrial and related uses are retained, where compatible, the London Plan indicates that the managed release of surplus industrial land is acceptable, especially where it will lead to the provision of more housing in appropriate locations.
- At the local level, the Employment Land and Premises Study (2016) sets out that in both a low growth and central growth scenario the existing supply of industrial land will outstrip the future demand in the borough up to 2030.
- The site is allocated within the Lombard Road/York Road Riverside Focal Point SPD and is designated as a MUFIEA, both of these designations prioritise the release of non-industrial uses. The designation of the site as a focal point of activity is based on clearly defined



benefits of regeneration, townscape and public realm that will result as a direct consequence of the co-ordination of development across a number of sites. Whilst some of the sites in the Lombard Road/York Road Riverside Focal Point have already been developed, further sites such as the redevelopment of 37 Lombard Road will complete the regeneration and continue transformation of this area.

- The MUFIEA designation encourages rather than restrains new development. It provides an opportunity to diversify the uses on a site, whilst re-providing modern fit for purpose employment floorspace and utilising the land more efficiently. However, the mixed use schemes being promoted on sites designated as MUFIEA are more compatible with SME space as opposed to the re-provision of industrial/distribution uses, and this should be given more prominence within planning policy wording.
- The environmental quality of the site and surrounding area has been identified as poor quality. The existing use of the site as a builder's merchant with its low level shed-like structures, associated open storage and utilitarian security fencing detract from the character of the surrounding public realm. Redevelopment of the site would provide an opportunity to make significant improvements to the townscape quality of Lombard Road, Gwynne Road and Harroway Gardens open space. This includes the opportunity to provide active frontages, public realm improvements and pedestrian routes through the site which would significantly enhance the area.
- Redevelopment of the site would allow for additional purpose built SME workspace or office premises at ground floor level, in close proximity to existing SME clusters, which would contribute towards identified office premises demand (low growth scenario – 31,700 sqm, central growth – 48,400 sqm and 65,800 sqm). Therefore, it is likely that some employment floorspace will be retained on the site once redeveloped but at a much higher standard to meet modern day requirements. However, it is considered the re-provision of employment uses should be based on an equivalent number of jobs and not an equivalent quantum of floorspace, as SME workspace/office premises would have a higher employment density than the existing industrial/distribution use.
- Given the relatively low density of the current built form, redevelopment of the site would make a significant contribution to housing targets and wider regeneration objectives of designated focal points, including making more efficient use of brownfield land in conformity with sustainable planning principles but also to achieve a better relationship with the surrounding land uses. In terms of proposed residential provision, the redevelopment of the site would deliver much needed affordable housing, family sized units and wheelchair accessible homes.

Conclusion

In summary, we request that the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas, in particular for the site at 37 Lombard Road, as this will enable the site



to be redeveloped for a mixed use scheme which will deliver a number of benefits to the Lombard Road/York Road Riverside Focal Point.

If you require any additional information please do not hesitate to contact Guy Bransby on 020 7399 5409 or Jennifer Watson 020 7399 5346 of these offices. We look forward to receiving acknowledgement of our submission.

Yours faithfully,

JLL

Enclosures

- Appendix 1 – Site Location Plan

Appendix 1 – Site Location Plan



From: Sophie Lancaster <Sophie.Lancaster@artscouncil.org.uk>
Sent: 11 November 2016 09:34
To: PlanningPolicy
Subject: Wandsworth Land Use Policy Consultation Response

- The Arts Council welcomes the inclusion of culture within local plans. Cultural well-being, as set out in the National Planning Policy Framework (page 3) is a key component of the dimension of sustainable development that it is the purpose of the planning system to achieve. The NPPF further states as one of the core principles that planning should take account that it should: “support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”
- The planning system can support this in a number of ways:
 - Considering the specific local contribution of culture to sustainable development as defined in the NPPF
 - Considering how best to provide opportunities for local people and visitors to engage with arts and culture
 - To secure developers contributions to support the development and delivery of cultural infrastructure
- There are a number of challenges and opportunities which considering how culture can contribute to sustainable development through the planning system can add value to a local area
 - Increasing economic prosperity and employment – DCMS’s Creative Industries Statistics indicate that the creative industries have higher levels of productivity, growth and job creation than the economy as a whole. However, this contribution can be restricted if there is a lack of workspace and studios.
 - Increasing social wellbeing – the planning system can support the value to social wellbeing of arts and culture through considering the spatial nature of engagement with cultural opportunity – and how planning can help tackle barriers to engagement
- The Arts Council encourages local planning authorities to consider these issues as part of the development of local plans, and within the context of the NPPF

Sophie Lancaster
Relationship Manager, Libraries London
Arts Council England
21 Bloomsbury Street, London, WC1B 3HF
0207 268 9691 | 07917 540 880

Please note - I am not at work on Mondays

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For all general enquiries, please contact our Enquiries team on 0845 300 6200 or 0161 934 4317.

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*I think **#culturematters** – do you?*

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22/10/2016

Wandsworth Council Local Plan

It is alarming that despite the growing recognition of the vital importance of artists' studios and the evidence of the crisis they face, there is still so little focus or sense of urgency among policymakers. ACAVA alone has lost 233 studios in central London in two years. The haemorrhaging of over 3,000 artists' studios from the city predicted by the GLA September 2014 Artists' Workspace Study to occur over five years, has not been staunched.

This is of course one element of the wider problem created by escalating property prices and changing planning laws for small and start-up enterprises which need inexpensive workspace. Planners increasingly refer to workshops, making spaces, creative hubs, or open workspaces, all of which are essential, but the particular requirements of the arts and creative studio sector, the unique and vital contributions they make, and their vulnerability, are insufficiently recognised.

Over almost half a century a growing number and variety of organisations have turned abandoned industrial property, empty housing and obsolete buildings into affordable studios for professional artists and other cultural workers. This has sometimes been financially supported by local authorities, arts bodies and regeneration agencies, other studios have been viable without subsidy because the property was unwanted and cheap. Now property in London is so expensive affordable space is impossible to create without support and the funding available is insufficient to replace lapsing leases. Artists are leaving London, and the vital contribution they make to the wellbeing and economy of the city is threatened.

Studio providers now need more robust support, including from local authorities as the GLA Study indicates, if their strenuous efforts to retain and build creative communities, and the

ACAVA 54 Blechynden Street London W10 6RJ
telephone 020 8960 5015 fax 020 8960 9269 email post@acava.org web www.acava.org

creative industries they generate, are to continue to be successful.

Duncan Smith

Artistic Director of ACAVA and Chair of the National Federation of Artists' Studio Providers

ACAVA 54 Blechynden Street London W10 6RJ

telephone **020 8960 5015** fax **020 8960 9269** email **post@acava.org** web **www.acava.org**

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03/11/2016

Planning Policy
Housing & Community Services
London Borough of Wandsworth
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir/Madam

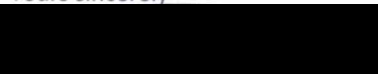
Re: Wandsworth Local Plan: Employment and Industry Review Policy Options

We are the owners of No 25 Lydden Road (SW18 4LT), which is currently within the Bendon Valley Locally Significant Industrial Area (LSIA). It has recently been brought to our attention that you are consulting on the above document and whilst we have not had time to respond to all of the questions posed, we would like to make some general comments about the Bendon Valley LSIA.

We feel that the Bendon Valley area has changed significantly over the years and we are struggling to operate effectively. At the moment we are considering various options including moving away from the area as we no longer feel that it is an appropriate location for industrial use. We therefore support any proposals to re-designate the area to residential and/or a mix of uses and would like to promote our site for this purpose.

We request that these comments are considered as part of the Employment Land Review process and also ask to be kept up to date with the results of this consultation and be notified when the next consultation opportunity arises.

Yours sincerely



Gavin Scillitoe
Managing Director

BATTERSEA ARTS CENTRE

Employment and Industry Review

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

Wandsworth has a terrific opportunity to develop itself as a home for London's Creative Industries. The Creative Industries is the fastest-growing sector of the UK economy. As the Creative Industries Federation recently stated: "The Government currently risks failing to capitalise on the potential of the wider creative industries, ranging from architecture to design to video games by appearing to focus support for innovation and R&D narrowly on science and tech. The creative sector is well placed to help drive growth across the entire country and so we see huge potential in the £1.8bn funding awarded to local authorities and local enterprise partnerships (LEPs). Investment in the creative industries has been key to the Northern Powerhouse development and other forward-thinking LEPs have identified this as an area for growth." When looking at creative space, it is worth considering the different types of spaces that are preferred by different parts of the creative industries.

We have a number of competitive advantages in Wandsworth in terms of becoming a home for the creative industries in London:

- companies like Apple are coming to the borough with their national headquarters;
- nationally celebrated arts organisations like BAC are creating new cross-sector models;
- the borough has a track record of supporting small businesses and start-ups.

We think that affordable creative workspace is very important. But even more important is that developers have conversations with local delivery partners to explore the best way to deliver benefit in the local area. This might be the provision of affordable workspace, but depending on the nature and location of the development, there might be more appropriate delivery mechanisms such as training, business development or activity programmes. The key to the success of any developer led plan is engaging local creative and cultural organisations in the conversation, so that the eventual offer, that is created, is joined up and user-tested with local partners.

Could local cultural organisations be used as a placemaking agency to ensure that the offer made by the developer is fit-for-purpose? We have had various conversations with colleagues at GLA about the idea of cultural organisations playing a stronger role in placemaking and supporting developers to strengthen their delivery plans.

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

The provision of space is only one aspect of any development. Again, the mechanism needs to be more sophisticated than simply the provision or allocation of square feet. Could there be a mechanism which is about consulting, from a placemaking perspective, with local creative and cultural organisations, and shaping a partnership plan in dialogue with those organisations? This kind

of dialogue might define the need for cultural spaces though it might also identify other more pressing needs which developers could engage with.

Question 41

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

Wandsworth is predominantly a small business economy. Of the 13,595 VAT registered businesses in 2013, nearly a quarter qualified as start-ups, having been registered for less than two years; this is a higher proportion than London as a whole (Inter Departmental Business Register, ONS 2014). In addition, recent data from the Banksearch service shows the total number of new start-ups in 2015 as 2,658; further demonstrating the strong entrepreneurial culture in the borough. Battersea evidently provides great potential for enterprise development, but finding appropriate workspaces remains challenging. Though available workspace is characterised by clusters of creative businesses, it is generally limited, with much of the redevelopment of previous office and industrial spaces into residential. Where affordable workspace is available, there is little provision for incubator, accelerator and co-working spaces (IACs), with only one incubator space and three co-working spaces identified in the GLA report Supporting Places of Work: Incubators, Accelerators and Co-working Spaces.

Question 42

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

This should be considered on all development where a creative, daytime economy is, or can be supported. This should be especially important in areas where there is already the infrastructure and local economy that would benefit from an increase in small, creative, businesses with the transport links to support such as Clapham Junction.

4 November 2016

Planning Policy
Planning and Development Services
Housing and Community Services Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

By Email: planningpolicy@wandsworth.gov.uk

Dear Sir/Madam

Representations on behalf of Battersea Project Land Company Limited (BPLCL) regarding the Employment and Industry Review: Policy Options Document October 2016

DP9 Limited, on behalf of the owners of Battersea Power Station, hereby submit formal representations to LBW regarding the above draft document which was issued for consultation on 7th October 2016. Please find our comments below, which we respectfully request are taken into consideration.

Question 11: Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

The regeneration objectives for Nine Elms are currently being implemented to transform the area into a mixed-use part of central London, with Battersea Power Station at its heart. The masterplan for Battersea Power Station contains a mix of uses, including a large proportion of commercial floorspace which is crucial to the success of Nine Elms as a place and as a sustainable urban quarter. We therefore support the continued promotion of the regeneration objectives for Nine Elms, but with a recognition that during the lifetime of such a large-scale project, site-specific challenges and wider economic and social changes may dictate shifts in the focus of land uses. We do not see the need to protect industrial and distribution sites beyond the SIL.

Question 21: Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

As noted above, large scale offices are a significant component of the Battersea Power Station masterplan. They will bring jobs and economic growth which will in turn support the shops and restaurants, and provide the funding certainty for the transport infrastructure that is so critical to driving the regeneration of the area. The recent letting of 50,000sq m of office floorspace in the Power Station to Apple strengthens the viability of the town centre, but to



realise the full potential of such a large occupier, Nine Elms and Wandsworth need to provide a wider network of services and links, including supporting the provision of smaller incubator business units, which have been commented on separately below in response to questions 37, 39, 41 and 45. The creation of a tech hub in Nine Elms has the potential to create a multitude of employment and training opportunities for the borough.

Notwithstanding the importance of offices to the success of the masterplan, the primary objective is the restoration of the Grade II* listed Power Station and the regeneration of this long-derelict site. This regeneration process will span economic cycles and requires flexibility to adapt to changing circumstances, in order to deliver the land use mix that will most effectively support delivery of the scheme in the long-term. This flexibility is particularly relevant now, given the uncertain global economic position caused by Brexit.

Question 22: Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

The Options Document notes that the ELPS identifies a need for an additional 31,700 to 65,800sqms of office floorspace over the next 15 years to serve the local/sub-regional office market. Battersea Power Station currently has permission to provide upto 150,773sq m of office floorspace, of which approximately 50,000sq m has been pre-let to Apple. This letting should provide a valuable boost to the viability of Nine Elms as a commercial office location, however wider economic uncertainty makes it difficult to predict exactly how much floorspace will be required. The current downward trends in the residential market could provide an opportunity for Nine Elms to accommodate additional office floorspace if the demand arises, and so we would suggest that policy remains flexible enough to support additional office floorspace should it come forward. The market will drive floorspace need and policy should provide an effective framework to accommodate change.

Question 37: Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

The provision of employment floorspace needs to be considered on a site by site basis. Not all major sites will be suitable for employment uses, and employment needs to be considered across the Borough to ensure that there is a strategic approach which encourages business growth that works with the market. Forcing the creation of employment floorspace in locations or forms which are not attractive to occupiers will not be of benefit and could dilute the Borough's employment offer. Instead, we consider that policy should generally focus on allowing and encouraging employment floorspace to happen where there is a market demand, and provide the framework to support and encourage the networks and environment that will make new employment developments successful.

Question 39: Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

Question 41: Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

Question 45: Should the Local Plan require managed workspace to be provided on new developments in the borough?

At Battersea Power Station, we anticipate that the Apple letting will lead to organic growth and, we hope, the creation of an employment hub which could contain elements of creative, affordable and managed workspace. We will need to work closely with the Council and tenants to foster and develop such a hub, which is likely to include incubator and/or managed workspace. However, rather than force its provision we consider that the most effective role of planning policy is to create the framework to allow voluntary provision, by avoiding prescriptive or burdensome requirements that make other commercial uses more attractive, by protecting suitable areas or buildings from other uses and by guiding providers of this floorspace to appropriate sites. This could include other incentives, for example, removing the requirement for such floorspace to pay CIL, or allowing developers to 'trade' such floorspace with other planning benefits.

Question 40: Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

As with creative workspace, we would caution against an overly prescriptive approach to locating cultural uses which attempts to artificially create or direct cultural spaces where they may not be appropriate. Not every major site is appropriate for cultural spaces or uses, and the creation of too many spaces in locations or formats that are not attractive to cultural operators would be detrimental. There are also existing cultural spaces in need of revenue support, and so the provision of new spaces must be done having taken account of the existing cultural landscape in an area.

Culture should be considered at a wider level via planning policy rather than on a site by site basis. We would also support its promotion as a meanwhile use on redevelopment sites. Strategic coordination will ensure more cohesive delivery, particularly in regeneration areas. However, in light of the low development value of cultural uses, there should be recognition that other obligations such as affordable housing, may need to be reduced to off-set the cost of delivery.

We would welcome the opportunity to discuss the content of this letter should you find it helpful. Please contact Jonathan Smith for further information.

Yours faithfully,



DP9 Limited

CC Gordon Adams, Head of Planning, on behalf of BPLCL

The Battersea Society



reply to: planning@batterseasociety.org.uk

14 November 2016

Adam Hutchings
Planning Policy
Housing & Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

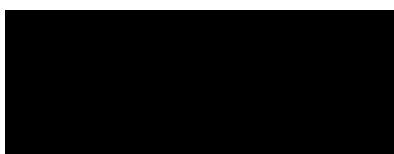
Dear Adam

Local Plan: Employment and Industry review - policy options consultation (Oct 2016)

At the Planning Forum you kindly said you would accept late comments on the Employment and Industry Review from the Battersea Society, although we had passed official deadline.

We found it an interesting and extensive document. We have therefore focussed very much on the questions that bear directly on Battersea. These are attached as a separate document. We look forward to hearing about the wider response you received and how this will feed into the local plan review.

Best wishes



Liz Walton

Chair Battersea Society Planning Committee

cc: Planning Policy

Battersea Society response to Wandsworth Local Plan: employment and industry review – policy options consultation (Oct 2016)

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

The Battersea Society considers that this area should continue to retain its strategic status as an employment area. Its mix of small and larger firms offers significant employment opportunities and a mix of services to the immediate locality and more widely to central and south west London. It is relatively self contained, accessible and its uses do not generate significant nuisance to local residents. As smaller businesses in Nine Elms and elsewhere in Battersea, for example the Lombard Road area, are squeezed out by new development, this area will gain further significance.

Question 11

Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

We support the wider regeneration of the area with industrial and distribution sites focussed on the SIL. However we consider that the protection of existing employment and potential for new jobs, including in the industrial and distribution sectors, should be a critical part of examining applications for development across the whole of the opportunity area (as has happened for example with the redevelopment of the CGMA site). In addition, care should be taken to ensure that where new development results in the displacement of small firms and existing employment bases (e.g. Sleaford Street, Palmerston Court) alternative viable premises are offered, preferably locally. The Society welcomes the inclusion of incubator units within some of the new developments. Significant revision of existing planning permissions to reduce employment opportunities by replacing approved commercial space with additional residential units should be resisted on larger development sites.

Question 13

Should the clusters and sites identified above be protected for industrial and distribution uses?

The Battersea Society consider that C21: 99-109 Lavender Hill (Battersea Business Centre) should continue to be protected as it provides a high density cluster of small business units for a wide range of businesses and services from start up to long term established companies in the buildings. These provide a wide range of units for local entrepreneurs at accessible levels of rent

Question 14

Should this include specific protection for such uses located in railway arches?

The potential of the extensive space in railway arches available across the Borough should continue to be protected and realised. Consideration should be given to freeing up unused arch space as potential relocation for SMEs displaced, for example, from MUFIEAs where industrial uses are no longer being protected. Efforts should be made to ensure that displaced businesses are offered alternative accommodation at rents affordable relative to those they have had to move from.

Question 15

If so, should the Local Plan allow change or redevelopment to non-industrial uses provided that there is no demand for the industrial or distribution use? Should redevelopment of these sites prioritise alternative employment uses?

The main protection should be to resist pressure to redevelop these sites for non-employment use or

conversion to purely residential.

Question 17

Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

Traditionally Battersea has sustained a mix of housing types and tenures alongside light industrial and office uses and we would hope this social mix and balance can be retained as far as possible. In order to maintain a range of local employment we would support redevelopment of units to a higher density on existing sites rather than relocating business to areas outside the Borough. There needs to be protection, however, against consequent increases in noise, traffic generation outside normal working hours and near to existing residential areas.

Question 18

**Should the Local Plan seek to protect offices in the following locations:
Town Centres;
The part of the Central Activities Zone that is in Nine Elms;
Focal Points;
Smaller office clusters near transport interchanges or on the edge of town centres?**

Yes

Question 21

Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

Yes but see response to Q 11 above

Question 36

**On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor?
Are there other design and management issues that should be taken into account for large-scale mixed use schemes?**

Care is needed to ensure that potential nuisance from long and anti-social hours of working, operations noise, traffic movements etc is recognised in the physical design of buildings (i.e. commercial access points not sited immediately below bedroom units on residential floors etc). Commercial /private areas need to be physically and securely separate including for example discrete visitor parking, drop off, delivery and service areas for residents and for businesses. A criticism of many of the new large scale mixed developments, for example in Nine Elms and Lombard road area, is that these elements of plans are not well understood and too frequently actually absent from proposals put forward.

Question 37

Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

Question 38

If so, should this floorspace be of a particular type or size?

Our particular interest is the regeneration of the Winstanley Estate. A word search of the preferred option includes no reference to employment as such and the only reference to 'work' is in relation to the library providing potential space in which to work - perhaps this should read 'study'? A major regeneration project such as the Winstanley should not be as narrowly conceived as the current proposal which focusses almost totally on housing and open space, There is little integration with

complementary employment and business support opportunities for Winstanley residents, either within the designated regeneration area or in locally accessible employment areas. Some small workshop spaces should be provided within the total scheme and greater opportunity made of the potential of the railway arches in Grant Road, not merely for retail but for use by incubator business and local start ups. Likewise there should be a strong strategic location based employment policy to assist residents access nearby employment and business areas. This could include opportunities arising from the business space proposed on developments within Plantation Wharf and elsewhere in the Lombard Road SPD area. The economic development department has such policies but they do not appear to be adequately reflected in the regeneration documents so far presented.

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

Yes. A primary objective should be to provide creative workspace suited to local residents, both those already in professional and creative industries and those seeking to set up in these sectors. There has been significant success in attracting such uses in the new developments in Nine Elms, around Battersea Bridge Road/ Parkgate Road and York Road. Such space may also offer the benefit of related employment opportunities in support services such as again may be well suited for those living locally.

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

Every effort should be made to encourage developers to include such space within developments. Battersea is deficient in both cinema space and in small halls for use by local performance groups. S106 /CIL should be used to support such provision where applicable.

Question 41 (and 42 - 44)

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

Yes. Provision of different types and size of workspace combined with business models which build in cross subsidy to allow initial rent free or highly subsidised rent structures for start -ups should be a condition of new business developments. Retention of clusters such as the Battersea Business centre also helps retain lower rent units.

Question 45 (and 46 -7)

Should the Local Plan require managed workspace to be provided on new developments in the borough?

Certainly on major regeneration schemes and mixed use development

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

Question 49

Are there other designations that would be more appropriate for the Havelock Terrace area?

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

Question 51**Should the Local Plan allow residential uses in any part of the SIL?**

If the Palmerston Court development is approved and built then these questions are too late as there will be a large element of residential injected locally. Although that site is just outside the SIL it effectively is part of the totality of employment in this part of Battersea. In principle designation of this and possible areas further south within the SIL as an Industrial Business park makes sense given the coming of Apple and other potential secondary business services generated by the Power Station, CGMA etc. We would generally oppose any replacement of existing non-residential uses with new housing within the SIL on grounds that the mix of uses could generate poor quality environment for residential development and loss of employment potential in this part of the Borough.

Question 52**Are there opportunities for further consolidation of industrial and other uses in the SIL? If so, how can this be realistically achieved and how would it contribute to intensification of employment uses, improvements to access and upgrading the quality of the public realm in and around the SIL?****Question 53****Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?**

Generally we would support greater intensification of uses in the area where this does not cause major knock on effects in terms of significant increases in heavy traffic, deterioration in air quality and noise pollution and offers greater opportunities for small local service companies.

Question 56**Should the Local Plan continue to protect the function of New Covent Garden Market (following the implementation of the consolidation project recently granted planning permission)?**

Yes it is strategically important both locally and for London as a whole. It also moderates the impact of the dense housing developments in Nine Elms.

Question 63**Should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review?****Question 64****Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?****Question 65****Should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review?**

We agree these safeguarding policies should be retained and given fuller consideration as part of the Local Plan review.

14 November 2016



our ref: **Q30026**
your ref:
email: leo.cunningham-baily@quod.com
date: 04 November 2016

Policy and Design Team
Planning and Transport Division
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir/Madam,

CONSULTATION ON WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW - POLICY OPTIONS (OCTOBER 2016)
REPRESENTATIONS ON BEHALF OF BIG YELLOW SELF STORAGE COMPANY LIMITED

We are instructed by our client, Big Yellow Self Storage Company Limited (“BYSS”), to submit representations on their behalf regarding the consultation on the Wandsworth Local Plan: Employment and Industry Review Policy Options (Oct 2016).

BYSS is one of the leading self storage operators in the UK. It is a publicly listed company which develops, owns and operates modern self-storage centres for personal, business and leisure storage. It now has 73 trading stores open, totalling over 4.6 million sqft of storage space. BYSS operate two stores within the London Borough of Wandsworth: one at 100 Garratt Lane, SW18 4DJ and another at the York Road Business Centre, SW11 3RX. BYSS has been a pioneer in the self-storage industry, being the first operator to focus on providing the highest quality service to its customers. It has also been the first operator to build purpose built warehouses, as well as providing high quality, sensitive conversions of existing premises. The Company is listed on the London Stock Exchange and employs over 300 full and part time staff.

The BYSS store at 100 Garratt Lane is located within the boundary of the Old Sergeant Locally Significant Industrial Area (LSIA). The store at the York Road Businesses Centre is located within the existing Gwynne Road Mixed Use Former Industrial Employment Areas (MUFIEA) designation. The York Road/Lombard Road area has seen significant change in recent years, from a predominantly industrial/commercial location to an emerging mixed use community and this is recognised through its designation in the Local Plan as a MUFIEA. The site is also allocated on the proposals map as Site 109 – York Road Business Centre.

Question 12: Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

Our client considers that the boundary of the existing MUFIEA designations, including the Gwynne Road MUFIEA within which the York Road Business Centre store is located, should not be altered.

As the site falls within a MUFIEA, the principle of additional residential development as part of a mixed use scheme is acceptable, where it can be demonstrated that wider regeneration benefits can result from the proposals, and this is confirmed in the site specific allocation.

In December 2015, the Lombard/York Road Riverside Focal Point SPD was adopted. The York Road Business Centre is shown within this document as being suitable for mixed use development incorporating replacement employment floorspace and residential use.

The site therefore has significant potential to contribute towards the regeneration of the Lombard Road area, complementing the other sites coming forward, and to optimise its development potential through introducing new uses, including residential, as well as retaining and expanding the existing employment and retail uses. Our client is therefore pursuing a mixed use development to provide residential units, retail units, flexible studio/office space, and a new Big Yellow Self Storage store. BYSS are currently engaged in ongoing pre-application discussions with officers at the London Borough of Wandsworth regarding this redevelopment and are in the process of undertaking public consultation events, following a meeting with the local ward Councillors.

The self storage (Use Class B8) offered by BYSS stores is compatible with residential (Use Class C3), as demonstrated by the BYSS store in Kingston-upon-Thames which successfully combines self storage and residential uses within a single building.

Question 42: Should affordable workspace be sought on developments of a particular type or size, and in particular parts of the borough?

Customers of BYSS use self storage for either domestic or business purposes. On average around 80% of customers of a store will be domestic, with the remaining 20% being business customers. This proportion relates to the numbers of customers, but business customers usually take a greater area of floorspace and thus the floor area they occupy is actually substantially greater than 20% (around 30%). The flexible service provided by BYSS is particularly attractive to Small and Medium Enterprises (“SMEs”), as detailed in the Big Yellow - ‘Helping Local Business to Grow’ document enclosed with this letter.

It is therefore suggested that the Local Plan be amended as part of the Employment and Industry Review, to explicitly clarify that warehouse and distribution (Use Class B8) uses should not be subject to a requirement to provide affordable workspace, given the supporting role B8 uses already provide for SMEs and the flexible manner in which this storage space is let.

Question 44 Should managed workspace be considered to be affordable, or are there other criteria that should be set?

In the event that affordable workspace does become a requirement of business developments in the borough, it is suggested that the Local Plan should be amended to clarify that affordable workspace can be ‘affordable’ either by virtue of its design **and/or** the manner in which it is let. This would provide developers with the flexibility to either let floorspace at a reduced rent and/or design the workspace so it can be let in an affordable manner (e.g. micro office space).

If workspace is affordable by virtue of its design, it is not considered that such floorspace needs to be managed by an affordable workspace provider. This is because such workspace is inherently ‘affordable’ as a result of its design rather than how it is managed.

Summary

In summary, our client considers that the site York Road Business Centre has significant potential to contribute towards the regeneration of the Lombard Road area, optimising its development potential through introducing new uses, including residential, as well as retaining and expanding the existing employment and retail uses.

It is also considered crucial that affordable workspace should not be required in association with warehouse and distribution (Use Class B8) developments, due to the support such uses already provide to SMEs and the wider economy. Where affordable workspace is pursued, it is strongly suggested that the updated Local Plan explicitly clarifies that such workspace can be affordable by virtue of its design **and/or** the manner in which it is managed. If affordable as a result of its design, it is not considered that such workspace needs to be managed by an affordable workspace provider.

A summary of our client’s specific comments in relation to the Wandsworth Local Plan: Employment and Industry Review - Policy Options (October 2016) is set out in Table 1 below.

Table 1: Specific Representations made on behalf of BYSS

Our Ref:	Question Ref:	Responses
001	12	<ul style="list-style-type: none"> - The boundaries of the existing MUFIEA designations, including the Gwynne Road MUFIEA, should not be altered. - The site York Road Business Centre has significant potential to contribute towards the regeneration of the Lombard Road area, optimising its development potential through introducing new uses, including residential, as well as retaining and expanding the existing employment and retail uses..
002	42	<ul style="list-style-type: none"> - The revised Local Plan should explicitly state that warehouse and distribution (Use Class B8) uses should not be subject to a requirement to provide affordable workspace, due to the supporting role such uses provide for SMEs and the wider economy.
003	44	<ul style="list-style-type: none"> - The revised Local Plan should clarify that affordable workspace can be considered ‘affordable’ either by virtue of its design and/or the manner in which it is let. - If workspace is affordable by virtue of its design it is not considered that such floorspace needs to be managed by an affordable workspace provider.

I trust that the information provided in this letter clearly sets out BYSS’ position with regard to the Wandsworth Local Plan: Employment and Industry Review - Policy Options (October 2016). If you have any queries regarding this letter or the enclosed, please do not hesitate to contact me.



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I look forward to hearing from you shortly.

Yours sincerely,



Leo Cunningham-Baily
Planner

Enc. Big Yellow - 'Helping Local Business to Grow'

Planning Policy
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

roger@simply-planning.com
4th November 2016

Dear Sirs,

Representations – Employment and Industry Local Plan Document
53 Lydden Grove, London, SW18 4EW

We are instructed by our joint clients, Callington Estates Limited and The Callington Trust, to submit the enclosed representations in respect of the Policy Options Consultation for the Employment and Industry Local Plan Document. Our clients' land interest is the property known as 53 Lydden Grove, London, SW18. They are the freeholders of the site.

(a) The Site

The property (shown below) is located to the very north-west of the Bendon Valley Locally Significant Employment Area (LSIA), on the west side of Lydden Grove and close to its junction with Twilley Street. The building comprises a ground and ground and first floor building with a total gross floorspace of circa 638m². The building is divided into two units (Unit 1 – 395m² and Unit 2 – 243m²), both of which are occupied as offices within the Use Class B1(a). The occupation of the two units is:-

- Unit 1 – The rear single-storey building now occupied by Callington Estates Limited, Victoria Smee and Manuel Santos; and
- Unit 2 – The front two-storey building occupied by Chase Erwin.

Figure 1 – The Site



(b) Planning History

The property benefits from a long planning history. Most significantly, in the context of these representations, are the decisions from 2015 when three Certificate of Lawfulness (LDC) applications were submitted.

The first LDC (2014/7188), approved on the 25th March 2015, was to establish that the lawful planning use of the property was for storage and distribution purposes within Use Class B8. The second LDC (2015/2294) was submitted to establish the lawful use of the property as two separate B8 units. That application was approved on the 16th June 2016 with no conditions attached.

The third and final LDC (2015/4948) was submitted to establish the lawful building use as two self-contained office units (Use Class B1(a)). The application was approved on the 6th November 2015 with again no conditions attached. It confirms that the lawful planning use of the property is as two self-contained office units. That is the use the property is in today.

(c) Representations

These representations seek the removal of the site from the designated Bendon Valley LSIA. The following sections of this letter explain in detail why the site can, and should, be removed from the LSIA.

(i) Policy Context

Policy DMI1 of the Wandsworth Local Plan – Development Management Policies Document (adopted March 2016) is concerned with protecting land within the designated LSIA. It resists the loss of existing floorspace within Use Classes B1(c) B2 and B8 to alternative uses. Criterion (c) provides that other uses are unacceptable within LSIA. With regard to office uses within the LSIA, the policy confirms these will only be acceptable where the office use is '*ancillary to the principal use on site*' (criterion (b)). Our clients' site benefits (as explained above) from lawful use for office purposes and that is its current use. It is not a use considered in policy terms appropriate to the LSIA nor protected by the terms of Policy DMI1. Indeed, Policy DMI1 actively resists office uses within the LSIA. As such, in policy terms, our clients' site is inappropriate for inclusion within the LSIA.

Policy DMTS 14 of the Development Management Policies indicates that new office development (B1(a)) should be focused around the existing town and local centres as well as Nine Elms. The site is not located in either location and therefore this is not a location to which office use is encouraged.

(ii) Site Specific Considerations

The site is located on the very periphery of the Bendon Valley LSIA and forms an unconventional and illogical boundary (please see Figure 2) to the LSIA. Moreover, the site, with a total floor area of 638m², makes up a very small percentage (1.7%) of the Bendon Valley LSIA.

Figure 2 – Bendon Valley LSIA Boundary



The site is surrounded on two sides by residential properties and to the west by the Wandle River. This is a result of the site being located on an extended 'nib' of the Bendon Valley LSIA. The location of the site and the context of its immediate neighbours results in the site being unsuitable for those uses (B1(c), B2 and B8) designated as appropriate to the LSIA. If the site were in use for any of those purposes it would lead to inevitable conflict with the immediate residential neighbours and an unacceptable impact on residential amenity. This part of Lydden Grove is, with exception of our clients' site, wholly residential in character. It is not an area into which B1(c), B2 or B8 uses are appropriate. Indeed, by definition B2 and B8 uses are inappropriate to established residential areas such as this.

Figure 3 – Site and Surrounding Context



In addition, the local roads which must be used to access the site are extremely narrow residential streets, flanked on both sides by residential parking. These residential roads are not appropriate for large vehicles serving industrial/commercial uses, such as LGVs/HGVs. It is not possible for LGVs/HGVs to access the site from the main area of the LSIA (to the south) because of the width restriction in Lydden Grove at the southern limit of our clients' site. This is again indicative of the inappropriateness of this site for continued allocation within the LSIA.

Deliveries to and from the site by the use of LGV/HGV vehicles are likely to raise concerns with the local residents on the basis that LGVs/HGVs, given the layout of the adjacent roads, could create road congestion/conflict, raise noise levels and cause danger to pedestrians. The residential roads serving the site are wholly inappropriate for commercial deliveries to the site and will inevitably result in conflict with the amenities of nearby residents.

(iii) Response to the Employment and Industry Review Policy Options Document October 2016

The following paragraphs provide a response to the relevant questions which have been put forward within the Employment and Industry Review Policy Options Document October 2016.

Question 7: Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

Our client neither agrees nor disagrees that both the Bingo Hall and the Wandsworth Gas holder site should be prioritised for re-designation. What is considered to be important is to highlight the fact that the Bingo Hall site, as you will already be aware, is a large percentage of the total floorspace of the Bendon Valley LSIA. Should the Council identify the Bingo site as a priority for re-designation, it would be reasonable to also consider our clients' site, a far smaller site located on the periphery of the Bendon Valley LSIA, as a site that should also be excluded from the designated LSIA.

Question 8: Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why? and Question 9: Are there any other sites or areas within other LSIA's that should be prioritised?

Yes. Our clients' site should be included as a re-designated site within the Bendon Valley LSIA based on the justification as already explained within this letter. The site's lawful use (B1(a)) is outside of the relevant policy's identified uses for the LSIA. The site is also located on a "nib" of the Bendon Valley LSIA, adjacent residential properties and is inappropriate for designated LSIA uses.

Question 10: Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?

Employment designated areas such as LSIA's are strategically important to ensure that the Council has the means to protect employment land uses and ensure that the supply of employment land can keep up with current and future demand. It is though essential that, in defining LSIA's, their boundaries are logical, robust and defensible. They should not include land, such as our clients, that neither contributes to the LSIA or is appropriate for LSIA uses. If land is wrongly included in the LSIA's it will devalue them as a concept and weaken the Council's ability to defend the LSIA's from other uses. Although Employment designated areas such as LSIA's are considered to be strategically important, it is essential that all the land and sites within the LSIA's are carefully considered to ensure that each site is physically capable of providing a use that is appropriate to the LSIA and satisfies the policy context of LSIA's.

Sites such as 53 Lydden Grove, London, SW18, should not be included within LSIA's if they do not lend themselves favourably to the locational requirements of such employment areas as set out in Policy DMI1, i.e. B1(c), B2 or B8. Sites that are assessed as being unsuitable should therein be removed from the defined LSIA.

(d) Conclusion

In summary, these representations to the Policy Options Consultation for the Employment and Industry Local Plan Document seek to remove our clients' site from the designated Bendon Valley LSIA. The site is neither suitable in policy terms or practical in site specific terms for continued designation as part of the LSIA.

We trust this representation submission will be carefully considered by Wandsworth Council.

Yours faithfully,

A black rectangular redaction box covers the signature area.

Roger Birtles
Director

Enc.

3 November 2016

Mr Rob McNicol
London Borough of Wandsworth Council
Environment and Community Services
The Town Hall
Wandsworth High Street
London
SW18 2PU

Kieran Wheeler
E: kwheeler@savills.com
DL: +44 (0) 20 3320 8243
F: +44 (0)

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Dear Rob

**POINT PLEASANT WORKS, PUTNEY BRIDGE ROAD, SW18 1TU
REPRESENTATIONS FOR THE EMPLOYMENT AND INDUSTRY REVIEW: POLICY OPTIONS
CONSULTATION**

Further to our previous representations made in connection with the above site, I write on behalf of my client, Charterhouse Property Group (Charterhouse) to provide representations to the recently published Employment and Industry Review: Policy Options Consultation Document.

As you are aware, Charterhouse have an interest in the Point Pleasant Works site, on the corner of Putney Bridge Road and Point Pleasant, and are seeking to bring forward a mixed-use redevelopment to replace the existing tool hire operation currently on the site. They have entered into pre-application discussions with the Council and are continuing to revise and develop the proposed scheme on the back of the feedback and advice provided.

1. Site and Surrounding Area

The Point Pleasant Works site measures approximately 0.08 hectares and is currently occupied by a single storey building which is used as an equipment and tool hire business (Sui Generis use) with associated hardstanding.

The site is bound by a railway line to the north, a four storey office building to the south, the junction of Putney Bridge Road and Point Pleasant to the west and an electrical sub station to the east. On the western side of Putney Bridge Road, opposite the site, is a three storey public house and beyond this is traditional housing stock ranging between two and three storeys in height. To the north, beyond the railway line, the area comprises large new build residential developments, ranging from 4 storeys to 21 storeys in height.

The site is located within close proximity of Wandsworth High Street which forms part of Wandsworth Town Centre, defined as a Major Centre in the London Plan. In addition, Wandsworth Park is 120m from the site, which also provides access to the Thames Path.

The site is not located in a conservation area, but is located adjacent to Wandsworth Town Conservation Area. There is a Grade II listed building within 100m of the site, located at 159 Oakhill Road, which is currently occupied as flats.

The site has a PTAL rating of 4, indicating a good level of access to public transport. The site is in close proximity to Wandsworth Town National Rail Station (750 metres), East Putney London Underground Station (850 metres), and the bus stops along Putney bridge Road.

2. Background To Representations

The Council are in the process of reviewing employment premises and industrial land within the Borough. The Employment and Industry Review is a partial review of the adopted Wandsworth Local Plan 2016 and we understand that the Council hope to publish a submission version of the Employment and Industry Local Plan in March 2017.

The Policy Options Consultation Document has been informed by the responses received during the earlier preparation stage, as well as the Employment Land and Premises Study (2016) prepared by AECOM. The Employment Land and Premises Study assesses the quantity, quality and viability of the Boroughs employment land and provides the evidence basis to support the review of the Borough's Local Plan. Whilst the study does not consider sites on an individual basis, the Employment Land and Premises Study states:

"The ELPS will be used by LB Wandsworth to inform its future approach to the provision of, protection, release and enhancement of employment land and premises"

The Point Pleasant Works site is designated within the Central Wandsworth Locally Significant Industrial Area (LSIA) and is therefore covered by Policy DMI 1 of Wandsworth's Development Management Policies Document (2016). This states:

"Within the SILs and LSIAs, the loss of existing B1(c), B2 and B8 floorspace will be resisted unless full replacement provision is provided. Planning permission will be granted for new B1c, B2 and B8 development subject to compliance with Policy DMS1. In accordance with Core Strategy Policy PL7, SILs are also appropriate locations for waste management activity"

"With the exception of the provision of small scale uses which cater to the local needs of people working in the area which may be appropriate other use classes are considered unacceptable in these areas."

However, we note that once the new Employment and Industry Local Plan document is adopted, it will replace the existing employment and industrial land policies within the adopted Local Plan documents, including Policy DMI 1. As such, the Council should consider why such restrictions as outlined in Policy DMI 1, are no longer appropriate.

We have previously made representations on behalf of Charterhouse, as part of the initial consultation on the Employment and Industry Local Plan Review. Please refer to our letter dated 31 May 2016 (copy attached for completeness) which provides further information with regards to the relevant planning history and planning policy framework in relation to the site. Our previous representations also set out the reasons why the Point Pleasant Works Site should be removed from the Central Wandsworth LSIA, considering the use of the site currently comprises a tool hire shop (Sui Generis use) and that surrounding land uses, including residential dwellings, office use and a public house, would be adversely impacted by heavy industrial/warehouse uses synonymous with Class B1(c), B2 and B8 uses in this location.

The comments below expand on the previous representations made, in light of the policy options set out within the Consultation Document.

3. Response to Policy Options Consultation Document

The Consultation Document sets out a number of policy options and questions on the proposed approach. We have addressed the relevant questions in turn below.

Q.1- Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

Considering the three proposed growth scenarios, it is shown that within both Wandsworth itself and across the wider region, there is evidenced demand for additional small/medium sized, modern office floorspace. As such, the Borough should support a flexible growth strategy that takes into account the changing demand in the local market for employment floorspace and which seeks to address the need to provide additional office floorspace within the borough. In relation to this site, we would therefore support a central growth scenario, as the mid point between the two employment forecasts produced by GLA economics.

Q.4 - Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

The Central Wandsworth LSIA extends to 11.1ha and forms the largest designated LSIA in the Borough. An LSIA is defined in the Wandsworth's DMPD (2016) as land protected for industrial purposes, including uses relating to industry, storage and distribution.

The site is located on the western edge of the Central Wandsworth LSIA. The core area of the LSIA is located to the east and provides a range of industrial and storage/distribution uses. The western part of the LSIA is physically separated from the wider designation by residential properties on Sudlow Road which are not included within the LSIA. The surrounding uses within the western part of the LSIA comprise office uses and a self storage facility. It is therefore substantially different in terms of land uses to the wider LSIA and does not function as a proper LSIA and should not continue to be protected under the existing designation. Moreover, the site only extends to 0.08 hectares so is relatively small in size and is constrained by the surrounding land uses which are predominantly mixed-use in nature (residential, offices and a public house). It is very unlikely that the site would ever operate as a general industrial use due to its size and the potential impacts on the amenity of adjacent residential properties.

Given the foregoing, and in line with Paragraph 22 of the NPPF, we do not consider it appropriate for this part of the Central Wandsworth LSIA to be designated for general industrial purposes. Indeed, the Policy Options Consultation Document explicitly states that the Central Wandsworth LSIA is located within a wider area where there is ongoing change and improvements and as such greater flexibility with regards to land use is appropriate. We would therefore request that the LSIA boundary is amended to remove the western part of the LSIA from the wider designation, in particular the land around Putney Bridge Road, North Passage and Adelaide Road.

Q.8 - Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?

The Policy Options Consultation Document identifies two sites (the former bingo hall in Bendon Valley and Wandsworth gas holder site) that have potential for new development and intensification.

As outlined, Charterhouse consider that land comprising the western part of the Central Wandsworth LSIA should also be re-designated, considering the physical separation from the industrial core of the LSIA and that surrounding land uses do not function in line with an LSIA, as defined in local planning policy. We suggest that the core industrial function of the LSIA is focused on the central area of the

Central Wandsworth LSIA, with the area identified above being separate from this.

In particular, we suggest that land adjoining Putney Bridge Road, North Passage and Adelaide Road should be removed from the Central Wandsworth LSIA, for the purpose of enabling more appropriate mixed use development to come forward. We have set out our main reasons for this below.

Specifically, the Point Pleasant Works site is located in the north-western corner of the Central Wandsworth LSIA, on the periphery of the designated area. The area surrounding the site is predominantly mixed use in nature. For example, residential uses (Use Class C3) are located in close proximity, including at the junction of Oakhill Road and Putney Bridge Road and period residential terraced housing along Oakhill Road. The site is also further separated from the main industrial area by Sudlow Road, a residential street comprising period terraced housing. The site also sits adjacent to an office block (Use Class B1a) and opposite a public house (Use Class A4) located on the western side of Putney Bridge Road. The site is not suitable for use for noisy industrial or storage uses which would have an adverse impact on the amenity of the immediate area.

Furthermore, the existing use of the site as an equipment and tool hire business (Sui-generis) does not function in line with the majority of the other uses within the LSIA (Use Classes B1c, B2 and B8) and is not compliant with the industrial-type uses which are sought to be protected within the LSIA. The only use within the immediate vicinity of the site that is considered compliant with the industrial type uses associated with an LSIA is Shurgard Self-Storage (Use Class B8), located approximately 100m south of the site. However, this operation is not a noisy or intensive industrial use, and doesn't contribute to the LSIA's function in the same way as other core industrial facilities located in the central area of the Central Wandsworth LSIA.

Considering the above, the site is not considered to be part of the core industrial area, rather a transition site, between areas of general industrial uses and residential uses. We therefore suggest that the site be removed from the Central Wandsworth LSIA designation or at the very least, greater flexibility should be allowed with regards to the redevelopment of the site.

Development proposals currently considered by Charterhouse, either provide a mixed-use scheme with ground floor commercial/office uses or alternatively, an office-led (Class B1) scheme. Initial market analysis suggests that there is significant demand in this location for modern purpose built office floorspace which the emerging scheme would address.

Q.23 – Are there specific sites in or on the edge of the boroughs town centres that have the potential to contribute to the demand for local and sub-regional office floorspace?

One of the proposals being considered by Charterhouse in relation to the above site, includes the provision of Class B1(a) office space. This would increase the employment use associated with the site beyond the current use of the site as an equipment and tool hire business (Sui Generis). This proposal would also contribute to the forecast demand for additional small/medium, high quality and modern office floorspace over the next 15 years to serve the local and sub-regional office market, and is considered a more appropriate land use with regards to the surrounding uses.

The Policy Options Consultation Document identifies that there are currently constraints within the boroughs existing five town centres for new office development. As such, other suitable areas include edge-of-centre sites close to existing town centres, in particular areas to the north of Wandsworth Town Centre. The site is located approximately 300m north of Wandsworth Town Centre, which is defined as a Major Centre in the London Plan, and as such is an appropriate location for Class B1(a) development. Therefore, notwithstanding the appropriateness of the proposed development with regards to the surrounding uses, the location of the above site also lends itself to development as Class B1 use.

Q.55 – Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in LSIA's?

In principle, the Local Plan should not only allow development that falls within use classes B1(c), B2 and B8 in LSIA's. As set out above, this approach is not compliant with Paragraph 22 of the NPPF and without a review of all the LSIA's then a blanket restriction should not be applied to such large areas. Some sites within the LSIA's are currently more appropriate for class B1(c), B2 and B8 use than others and there should be greater flexibility for sites to be developed for other purposes. For example, the Council may consider it more appropriate to adopt a criteria based policy which could allow sites within LSIA to be redeveloped for uses other than Class B1(c), B2 and B8 where appropriate, taking into account factors such as location, existing use and surrounding uses. That said, the site is also considered appropriate for mixed-use residential development, which would complement the surrounding uses as identified above, and which would provide much needed new housing in this part of the Borough.

4. Way Forward

In light of the above, Charterhouse considers that a mixed-use development on the site, comprising ground floor commercial uses and residential accommodation above would be more appropriate given the location and function of the site. In addition, Charterhouse considers that an office building (Use Class B1a) on the site would also be appropriate. We therefore respectfully request that the LSIA designation is removed from the site to enable it to come forward for redevelopment in early 2017.

Please feel free to contact me or my colleague, Lucy Aspden (0207 299 3094), of these offices in the first instance if you have any queries or would like to discuss.

Yours sincerely

Kieran Wheeler
Director

Cc. C. Old, Charterhouse



Chocolate Films

G7 Ground Floor, Battersea Studios 1,
80 Silverthorne Road, London SW8 3HE

Tel: 020 7793 4287

info@chocolatefilms.com

www.chocolatefilms.com

The experiences of your business

Chocolate Films Limited is a limited by guarantee, Wandsworth based video production company. We are a creative business, producing video content for a wide range clients, and we also work extensively with other creative organisations. Our regular clients include TATE, The Science museum, The Royal Collection Trust, The Wallace collection, The Geffrye museum, The Museum of London, Charles Dickens Museum, The Jewish Museum and many more. We also work extensively with businesses providing promotional films, information films and filming conference and events for clients such as Institute of Directors, ARUP and Jeep.

From the beginning, 15 years ago, Chocolate Films has been focussed on business excellence with social goals. We run workshop programmes with young people, children and vulnerable adults to enable them to have creative filmmaking experiences. We work with between 2000 to 2500 people each year.

We are passionate about working in the local community and have always been based in Wandsworth or Lambeth over the 15 years. With both directors being residents for Wandsworth and educated in Wimbledon, there is an inherent interest in successfully growing the business in South London and developing our creative offer to local businesses and residents. Large scale local projects include our HLF funded heritage and Media project 'Nine Elms Past and Present', our 3 year Walcott Foundation funded learning programme for children in primary schools and the 'New Perspectives' 3 year filmmaking programme for Imperial War Museum.

Our business has been based in South London ever since it was founded in 2001. Our offices have been in Clapham, Tooting, Vauxhall, Stockwell, (now) Battersea. Wandsworth is the ideal base for us as it is close to the majority of our clients, however it has become increasingly difficult for us to remain in this area due to increasing costs.

What makes creative and cultural businesses thrive

Our business is based on three main tent-poles:

- A strong and committed skilled team of full time staff members
- The latest digital equipment and accessories
- A space that allows us to create, in a location that is convenient for our staff and clients.

Design requirements for premises

Chocolate Films has two sides - a video production business and a youth engagement workshop organisation.

For the workshops, we need a workshop space for our public engagement creative programmes, a smaller breakout room, a secure kit room an office and post production suite and a parking space. We are lucky enough to have won a pitch as part of the s.106 in Nine Elms cultural quarter and we will be moving Chocolate Films Workshops into a specially designed new property for our purposes.

For the Chocolate Films video production side, we need a space with a video production studio (approx 1500sq ft) a kit room, an office, a post-production suite, a client viewing area and two parking spaces. This is an ideal and a longer-term goal. We will be searching for this ideal and low cost space for our production side in the next 3-5 years and we hope to be able to continue to build this part of our organisation locally, in Wandsworth.

All creative businesses are different and therefore, the need for a flexible space that can be designed to the specific requirements of the business is advantageous and would encourage growth and innovation.

Additional costs for fitting out

This is a real issue. While we are delighted to have a reasonable space in 46 Ponton Road for our workshops, the fit-out costs for a new build are extremely expensive. The cost for basic design requirements (ie not including any video-specific kit or specifications) are over £350,000 and therefore something that is incredibly expensive to find and a high risk element to any business.

Is clustering with other cultural and creative organisations useful

We find being part of a wider eco-system of businesses to be very useful. Some creative businesses can help creativity and enable a support network for creatives, but being close to non-related businesses can also have great advantages. We

currently have our offices at Battersea Studios which is a collection of small businesses under one roof. This enables us to promote our services to the businesses within the building and we have already produced films for a couple of the organisations on site, having only been on the premises for 1 year now (Booktrust and Polar Bear). We find the location incredibly convenient for a number of reasons. The largest video rental service is on the same site so we are able to rent cameras and accessories for last minute jobs. We are close to our new premises location and to several of our partners and organisations we have a strong relationship with including the New Covent Garden Market, Hawker Publications, Wandsworth Arts, Cultivate and BAC.

The challenge of being in Battersea is the expense of the office space. However we need to be close to the centre of London as most of our clients are in central London and we need to be able to travel to the locations for shoots at early hours of the day. In this way, we are like a tent pole business servicing central London. A good example of this is on one day, a crew will need to be at the Courtauld Gallery at Somerset House by 7am and then go to Buckingham Palace in the afternoon for another shoot. Being within 3 miles of Central London enable us to be flexible and available for our clients. Without the proximity of our office, we would loose alot of our work.

Whether cultural organisations need to carry out un-neighbourly operations (such as being noisy or needing to operate outside standard work hours).

We work outside standard working hours as a shoot may start early in the morning or be an evening shoot. We therefore need to have access to collect and drop off our camera equipment to the office at all hours of the night. However we are not noisy. We use headphones for editing and do not create any noise. We do need a bay for our company car as this is the means by which are filmmaking crews travel to shoots, but again this is no louder than most organisations.

Discuss the role of smaller cultural organisations both for their local area and the wider cultural life of London – in particular your relationships with the strategically important cultural organisations that make the centre of London unique.

We work extensively with larger organisations. Being a small organisation has the advantage of enabling us to be light on our feet, and versatile. However partnering with larger organisations for projects helps us create work on a larger scale and helps our work to be seen. For example our work is currently on display at Science Museum, Museum of London, Museum of London Docklands, and we're planning one of the largest ever youth engagement projects with Kew Gardens.



Wandsworth Local Plan

Employment and Industry Review Policy Options Document October 2016

Response by Covent Garden Market Authority

1. The underlying rationale of the redevelopment plans for New Covent Garden Market (NCGM) currently being implemented is to ensure the fruit, vegetable and flower wholesale market continues to operate and flourish in the long term.
 2. Since NCGM moved to Nine Elms in 1974, significant changes have taken place in the food wholesaling sector, particularly due to the increased dominance of supermarkets with their own distribution systems. NCGM has changed its activities in response to these changes which has seen increased fresh food distribution and food processing, a greater focus on central London end users and a widening of activities in the food sector generally.
 3. A key factor for the market is accessibility to central London, and this was the reason for the market remaining in its current location, rather than moving to a more suburban location. A PwC report showed a small, but significant, environmental benefit to the market's current location.
 4. The redevelopment proposals will provide facilities better suited to current activities and to provide flexible floorspace that is better able to respond to future changes in the food industry. Whilst the market will operate on a reduced size site, the total trading space and level of activity will increase. As such, it is incorrect to suggest the market is consolidating.
 5. With the continuing pressures on employment and industrial land in this part of London, due to higher value residential and other uses, it is important that planning policies continue to protect such uses.
 6. The wholesale market includes the various core activities of the fruit, vegetable and flower markets, but also other added value food activities such as food processing, and it is anticipated these types of activity could increase in the future. The recent planning permission for redevelopment of the market (Ref
-

2014/2810) categorised the wholesale market as sui generis, reflecting the activities that take place that do not fall into Business Use Class (B1, B2 and B8).

7. It is important to ensure that the wholesale market activities are protected not only from changes of use to non-employment uses, but also from changes of use to B Use Classes, as there could be pressure from such uses as the quantum of employment land further shrinks.
8. However, the policy needs to recognise that the wholesale market business will continue to change and develop in the future and therefore need to include some flexibility to reflect this. An important part of the redevelopment of NCGM is to create a food hub for London. As well as the core wholesale activities, the new market will include incubator space and business support for startup businesses, workspace for food-related businesses, a retail market, restaurants, food shops and education floorspace. The aim is to become a showcase for food in London.
9. NCGM is an important employer (over 2,500 work at the market a good proportion of whom live locally) but it also has links to other employment uses in the area who form part of the “supply chain”. A study by Aston University gives a multiplier factor of 3 jobs for every job based at a wholesale market. It is important that general industrial, uses are protected to enable these synergies to be maintained and enhanced in the future. For example tenants’ vehicles and equipment needs to be maintained, so it is important that these services are available in close proximity.
10. The decline in local industry space has already led to the displacement of food service businesses who use the market. Demand for space from existing tenants at NCGM has meant that CGMA has only been able to rehouse two of those businesses. Recently the need to expand has seen some NCGM companies relocate out of the borough, to Park Royal and East London.
11. On a point of accuracy, paragraph 8.16 sets out total industrial land in the Borough - 141.9 ha. It is stated that Nine Elms (including NCGM) contributes 11 ha of this figure. However NCGM is currently 24.57 ha and following redevelopment, the main market site will be 14.5 ha (plus the entrance road from Nine Elms Lane).

November 2016

JLL

Jones Lang LaSalle Ltd
30 Warwick Street
London
W1B 5NH
tel +44 (0)20 7493 4933

www.jll.co.uk

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90 Long Acre
Covent Garden
London, WC2E 9RZ

t. +44 (0) 20 7849 3300
w. creativeindustriesfederation.com

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Dear Madam/Sir,

I am writing on behalf of the Creative Industries Federation to strongly recommend that Wandsworth's creative and cultural industries feature as key policy priority in its amended Local Plan - in particular around the provision of affordable workspaces. Revising the Plan offers Wandsworth a unique opportunity to increase support for its burgeoning creative industries and grow the social and economic benefits they bring to the local community.

The Creative Industries Federation is the national membership organisation bringing together all of the UK's arts, creative industries and cultural education. We represent over 1000 members from across the UK working in industries ranging from architecture to video games, publishing to performance and creative tech to craft and design, as well as universities, colleges and conservatoires. We represent the sector to Government, making the case for the infrastructure and investment, both public and private, crucial for the industries' future growth and success. In particular, we have worked closely with the Greater London Authority on the city's cultural strategy and have contributed to its inquiry into culture-led regeneration - a copy of our submission is submitted alongside this letter.

The creative industries are worth £87.4bn GVA to Britain and have been the fastest growing part of the UK economy since the 2008 crash, expanding at three times the average rate. The creative economy accounts for 1 in 11 UK jobs - a rate which rises to 1 in 6 in London. The city is both a national and global hub for the sector, housing almost a third of all the country's creative industries as well as of its creative economy jobs. In Wandsworth alone, 6500 people are employed across the 'arts, entertainment and recreation sector', accounting for 5.7% of its workforce.

Beyond these rates of employment and financial return, creative and



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cultural industries are central to local regeneration, making cities interesting places to work and live. Developing a strong cultural offer improves quality of life for residents and promotes community cohesion - an objective more important than ever in the current political climate - and also encourages business investment by increasing the area's appeal as a destination. The power of culture-led regeneration was illustrated by Liverpool's time as European Capital of Culture in 2008: the city received 9.7m additional visitors, generated £735m of additional local spend and left 85% of residents feeling that it a better place to live. The Federation's International journal, which also accompanies this letter, demonstrates the impact of culture-led regeneration on other cities, including Romania's Cluj and Rotterdam in the Netherlands.

If the creative industries are to continue delivering economic and employment growth and major community benefit, they must be properly underpinned by planning policy, including the provision of affordable workspace. The average creative company has under 4 employees and a disproportionate amount of self-employed and freelancers work in the sector, many of whom require studio space. These businesses often operate on far slimmer profit margins than businesses in other sectors. As such, the creative industries are particularly affected by the rising cost of space in London: some 3,500 artists are likely to lose their places of work by 2019 (30 per cent of those currently available).

In response to this issue, the Mayor of London has identified affordable creative workspaces as a policy priority for the city: the London Plan calls for "targeted support of the creative industries". It urges local development frameworks to "enhance and protect creative work and performance spaces; support the temporary use of vacant buildings for performance and creative work; designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration; provide arts and cultural facilities in major mixed use developments" and "seek to enhance the economic contribution and community role of arts". The Federation firmly supports these priorities.

Our submission to the Greater London Authority's inquiry into culture-led regeneration offers a number of recommendations on how local government can support creative industries in their area, in particular around providing affordable workspaces. These can be found in the attached document. In particular, we recommend that the GLA classify affordable workspaces as 'infrastructure' essential to the capital's creative economy. This would allow community infrastructure levy money to be accessed in order to support their development and maintenance.



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We urge Wandsworth to capitalise on this chance to support its local industries through such workplace provision. We suggest that it feature explicitly as a key policy area from early drafts, supporting the development of the local community and its contribution to one of the UK's economic success stories.

Yours faithfully,



Harriet Finney
Deputy CEO & Policy Director

Issue 1

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International

CREATIVE INDUSTRIES FEDERATION

International

Issue 1

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Authors:

Callum Lee, Lucy Minyo and Iain Bennett, BOP Consulting

Edited by:

Eliza Easton and Louise Jury, Creative Industries Federation

With thanks to:

Harriet Finney and Jack Powell, Creative Industries Federation

Paul Owens and Matthieu Prin, BOP Consulting

Design: Toyas O'Mara

The UK Government is proud to promote our creative industries as the greatest in the world.

But particularly at a time of political and economic uncertainty, we should be looking over our shoulder at those countries that have learned from - and are keen to emulate - our success.

Dear members,

Welcome to the first of our biannual international journals, which will examine where the UK's arts, creative industries and cultural education sit in a global context. In the light of the British public's momentous decision on Europe last month, the need for genuine insight is even more important.

The UK Government is proud to promote our creative industries as the greatest in the world. But particularly at a time of political and economic uncertainty, we should be looking over our shoulder at those countries that have learned from - and are keen to emulate - our success.

By showing the trends, the opportunities and the risks, we hope to give members information that can be used to enhance the UK's position as a creative powerhouse. In a market where growth means exports, we have to look globally to understand what more we need to do. The need to identify opportunities for competitive advantage can only be increased by the uncertainties created by Brexit.

In this first edition, we examine cities and countries with ambition and innovation we can learn from, and focus on one of the areas of greatest concern: education and skills.

While England is returning to a traditional academic curriculum, the rest of the world is opening up to a more flexible, creative approach. In higher education, our world-class universities are in huge demand from international students. But our analysis suggests Britain is failing to capitalise on the talent it is teaching and asks: is the UK in danger of becoming the world's creative finishing school?

The journal is just the start of the Federation's work in giving members the global perspective I have spent many years arguing is needed. I believe it is more necessary than ever.

Sir John Sorrell CBE,
founder and chair,
Creative Industries Federation

Why diplomat Tom Fletcher is swapping global conflict for a creative future

High-flying foreign affairs expert Tom Fletcher has only just taken on the task of chairing the Federation's new international advisory council but he has long been an advocate for the sector.

In Foreign Office postings from Paris to Beirut, he says it is the royal family, our sports stars and – in a very big way – our culture that counts. “More people in Lebanon know about Prince Harry and David Beckham and Benedict Cumberbatch than they do about our foreign policy.”

And he has taken a pro-active approach to waving the flag for Britain's creativity overseas, memorably even taking to the skies. “I thought I could do more for British design as an ambassador by flying a Red Arrow upside down than I could by making a speech.” It was, he admits, “utterly terrifying”.

Fletcher, 41, joined the Foreign Office at 22 with a first in modern history from Oxford, spending time in Kenya and Paris (where he met and married Louise, a psychologist), as chief of staff to the Africa ministers,

Baroness Amos and Chris Mullin, and as foreign policy advisor to three prime ministers – Tony Blair, Gordon Brown and David Cameron. He then spent four years as ambassador in Lebanon.

He is now creating the next generation of diplomats, splitting his time between New York and Abu Dhabi. “Rather than teaching the history of international relations and humanitarian law and protocol etiquette, I'm teaching them a series of skills – resilience, courage, curiosity, communication, but, most importantly, creativity because any decent negotiation is going to involve new creative ways of getting to the right answer. There's a massive gap for more creativity in diplomacy – and in government as a whole.”

This enthusiasm is why he has joined the Federation. He had bonded with Fed chief executive John Kampfner at the Hay Festival some years ago and stayed in touch. His interest in the sector grew personal when he started a blog as ‘the naked diplomat,’ then a book, ‘Naked Diplomacy: Power and Statecraft in the Digital Age’. He loved writing. “I found the mornings when I got up and wrote from six to seven I was then much more productive for the rest of the day.”

His aspirations for the international advisory council, with a mix of experts offering insight on different countries and sectors, mirror his work as a diplomat. “There was no point pretending I knew more about business than the businesses I was promoting but I did know about networks and about the local market so I could help people position themselves.” So the Federation work will be about knowledge and, potentially, match-making, knowing where there are the most brilliant and innovative people worldwide and how to connect with them. “We're not going to be in the business of telling people how to paint but we might be able to tell them where the next opportunity to paint is.”



“We’re not going to be in the business of telling people how to paint but we might be able to tell them where the next opportunity to paint is.”

Education is vital which is why he shares current worries about creativity being scheduled out of the curriculum. “There is so much of what our kids are learning that ultimately is not going to be necessary. I met this guy who’s a brain scientist re-wiring brains in order to teach people foreign languages. I asked, ‘How many decades before you can put Chinese into my brain?’ And he said, ‘Not decades, but years’.” He adds: “Einstein said, ‘Don’t bother learning anything you can read in books.’ We’ve got to be teaching our kids stuff that helps them understand how to use these massive amounts of data. Creativity is the key to that.”

Other countries have seen the potential. Take, for instance, Lebanon. “The Lebanese are so attuned to global trends, so international in their outlook. Ninety per cent of them live overseas because of war and because they’ve always been travellers and traders. They are training their kids up to be more creative because they think that is how they’re going to succeed in the global market.”

Abu Dhabi has a more government-driven approach, with support for the creative industries and giant projects such as the Saadiyat island cultural centre with its own Guggenheim and Louvre museums. “They just make it very easy for people to have the time and resource and support to be creative and to be entrepreneurial.”

Fletcher thinks it is important to seek out these new sources of power and influence and work with them. And it would be foolish to do anything to undermine our own role as a cultural powerhouse. “I think it would be really dangerous if we lose that market position. The harder it becomes to deploy hard power the more we have to rely on this amazing set of soft power superpowers.” The UK was second place behind the United States in the Portland consultancy’s soft power rankings this year, after topping the chart in 2015. It warned leaving the EU would have a negative impact.

Speaking with a united voice, as the Federation was established to do, is crucial. He feels the creative industries still fail to interact with government in a coherent way. “The sum is not greater than the parts. We’ve got to be better in making our case, about what the sector does and how it adds very specific value.”

The EU referendum result, and the Scottish referendum before that, point to a broader danger of Brits becoming a bit too inward-looking, he says. “We need to be open and ready to go and collaborate with these sources of inspiration globally and not to be the Donald Trump of the sector.”

“We need to be open and ready to go and collaborate with these sources of inspiration.”

His other projects shed light on his own can-do approach. He is trying to provide education for a million Syrian children and is pulling in business partners to deliver on the buildings, transport, tech and educational content required.

He is also overseeing a report for the next UN Secretary General on using digital technology to crack big world problems. “I have a team working on questions such as, Can robots get a better climate change deal than humans, can artificial intelligence change the nature of international negotiations, can we use digital mapping to deliver better disaster relief after the next volcano... There’s a whole load of creative ideas there at the space where technology, innovation and creativity meet my very old maps and chaps business.”

There’s nothing old-school maps and chaps about Fletcher.

Global trends in the creative industries

The creative industries in the UK have experienced the fastest growth of any sector since 2008.¹ But other countries are also taking the arts and creative industries seriously, and are backing this up with investment in ambitious and innovative schemes that could challenge the UK's competitive advantage.

Internationally, world trade in creative goods and services more than doubled between 2002 and 2011, driven by technological shifts. Mobile platforms and streaming services have changed engagement with video games, film and television. And the growing wealth of many emerging nations, from China to Chile, has created a larger market for international content, with digital platforms bringing this potential market closer.

UK exports are growing – but rivals are growing faster

The rise in demand for creative services and products is mostly from non-domestic markets, so to take advantage of all the opportunities available, the UK needs to up its game at selling overseas.

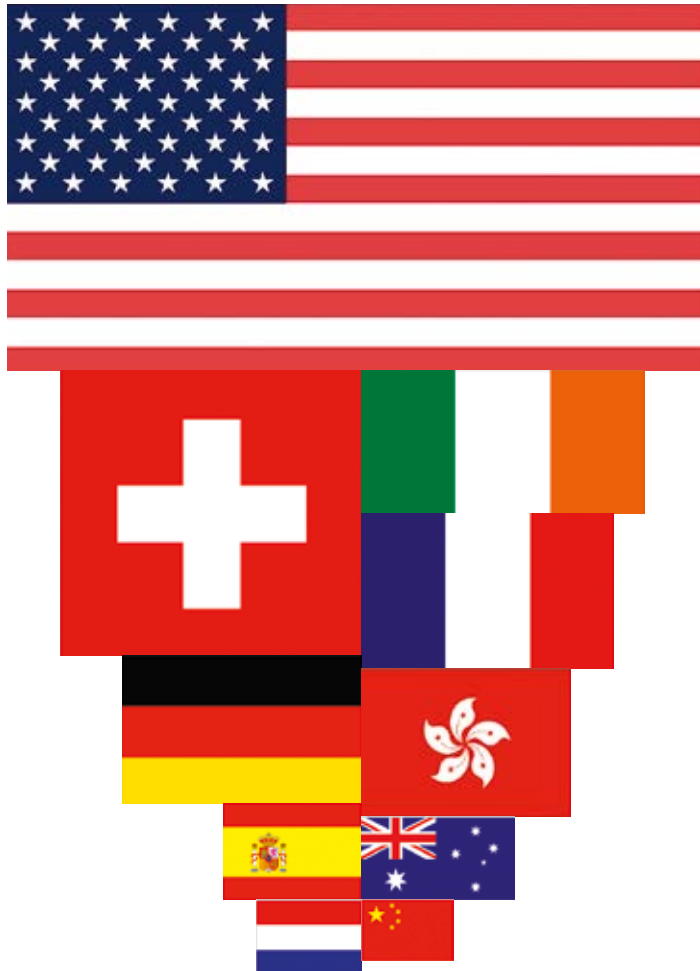
Over the last decade, UK exports of both creative goods (from Burberry coats to Harry Potter books and films) and creative services (from architectural plans to advertising campaigns) have increased, though not always with the steady trajectory that makes for long-term success. Our goods export growth rate – where there is international comparable data – is lagging behind that in other countries. Growth in China (15%), Germany (7%), France (7%), and Korea (6%) has been outpacing our own (4%).²

Global growth is coming from some surprising places

Analysis of the figures reveals some surprises. Of the major economies, Japan is forecast as having the slowest growth in consumer spend on electronics (0.9% annual growth).³ Consumer spending in Nigeria, by contrast, is forecast to increase by 15% a year.

Top 10 markets for UK creative goods⁴

	£m
United States	1721
Switzerland	883
Ireland	631
France	614
Germany	594
Hong Kong	517
Spain	344
Australia	313
Netherlands	292
China	253



Broadly speaking, wealthy countries close to home are far more significant consumers of our export products than large developing nations. We export more creative goods to Poland than we do to India and more to the Netherlands than to China.⁵

Import growth rates have plummeted in some places. In 2013, some of the highest growth rates for imports of creative goods were seen in Russia and Brazil, but both are now burdened with a falling GDP and overall economic decline.

Other opportunities for business exist beyond these established markets. We could do more in many countries with high import growth where the UK already has a large market. Countries with fast import growth but small existing market offer an opportunity for expansion. All the countries on this list had GDP growth in 2015 of between 4.5% and 5.5%, far outpacing the world and UK economies.

Two areas of future opportunity for UK businesses⁶

High growth, large existing market for UK creative goods

- **India**
- **Malaysia**
- **Turkey**
- **Korea**
- **Macao (China)**

High growth, small existing market for UK creative goods

- **Indonesia**
- **Pakistan**
- **Sri Lanka**
- **Luxembourg**
- **Dominican Republic**

Some on these lists might not be obvious. Macao's potential is based on a booming games, gambling and leisure industry, offering what UKTI describe as 'high value opportunities projects' to creative businesses, while the widespread use of the English language in countries such as Sri Lanka offers particular scope for television, publishing and film.

SPOTLIGHT: South Korea



Korea's Creative Economy Action Plan of 2013 aims for growth based on innovation and entrepreneurship, with the creative industries at its heart.⁷ The Korean Minister for Science, ICT and Future Planning described it as transforming the nation from a "fast-follower" to a "creative first-mover".

This ambition is built on infrastructure, education and entrepreneurship. Korean citizens are among the best connected in the world with the highest broadband speeds (22Mo/s). Its young people have topped international tests in creative problem-solving skills.⁸ And the country is also one of the easiest places to open a business. According to the World Bank, only five days are needed to register and open a business compared with the Organisation for Economic Co-operation and Development's (OECD) average of 10.

The plan also recognises the importance of connections between different parts of the creative economy, including the cultural sector, large tech firms and research. The first year saw 17 Centres for Creative Economy and Innovation (CCEIs) established. Each CCEI is linked to a top Korean company, and with the help of these companies offers startups practical support. It is too early to assess results, but Saudi Arabia and Brazil have signed agreements to learn from and replicate this model.



Creative Culture and Arts Education – Adolescent, 2013
Courtesy of Seoul Foundation for Arts and Culture

Cities as crucibles of culture and creativity

Cities can be powerful vehicles for change in the creative industries and devolution offers further opportunities in the UK. These examples illustrate what has been achieved elsewhere in the world.

Eastern Europe's outsourcing capital switches focus to creative tech



Romania's second city of Cluj-Napoca has 420,000 residents (about the size of Bristol) and is still recovering from economic decline in the 1990s.

But it provides real insight into how, even in difficult circumstances, creative and tech businesses can fast-track regeneration – and may be of interest to British businesses wanting to forge new international connections. Over the last two decades the city has developed a reputation as the tech outsourcing capital of Europe, for major European companies like Bosch and DeLonghi. This reputation was built on low labour costs and a well-educated population – Cluj has 11 universities and more than 100,000 students. But Cluj-Napoca is now looking to create higher-value jobs in the creative industries.

Led by an ambitious mayor, the city government has begun to nurture a startup culture visible in projects such as Cluj Innovation City, a £12m investment in a regional centre of excellence for creative industries, and ClujHub, a creative centre with co-working spaces. Cluj is also investing in its cultural assets. Its bid to become 2022 European Capital of Culture commits the city to a significant increase in funding, equivalent to increasing the current budget tenfold.



View of Cluj Arena, Cluj-Napoca, Romania.

Rotterdam is using architecture to give an economic facelift to the city



Investment in both infrastructure and promotion is helping Rotterdam position itself as the Netherlands' city of architecture.

It is already well known as the home of high-profile architectural practices such as Pritzker prize-winner Rem Koolhaas's Office for Metropolitan Architecture (OMA). However, the creative industries, and architecture and urban design in particular, have been identified as one of three focus areas in Rotterdam's economy (together with its port and medical cluster).

The city has provided support for educational institutions, affordable workspace and export initiatives – all essential components of making creative industries investment pay off in the long term. It has also invested in its cultural infrastructure. The Rotterdam International Architecture Biennial (IABR) has raised the sector's visibility while the Het Nieuwe Institute (formerly the Netherlands Architecture Institute) has nurtured innovation.

Gaining most attention is the city's investment in its own built environment, part of efforts to make Rotterdam an "attractive city" – one of the areas of focus in their economic strategy. Heavily bombed during the Second World War, its urban re-building programme was ambitious, but – by separating living and working spaces – created some problems similar to those in British post-war housing. The city has recently remodelled empty sites, creating extraordinary new buildings such as Rotterdam Centraal station, the Markthal and De Rotterdam (the largest building in the Netherlands). The New York Times recommended it as a place to go, saying: "Post-World War II reconstruction has changed the face of one of Europe's largest ports, where striking, cubed architecture gives shape to the most modern skyline in the country."



Markthal Rotterdam, at Binnenrotte, next to Blaak Station.



De Rotterdam by Rem Koolhaas (OMA) on the river Maas in Rotterdam.

“Post-World War II reconstruction has changed the face of one of Europe’s largest ports, where striking, cubed architecture gives shape to the most modern skyline in the country.”



Markthal Rotterdam, at Binnenrotte



Markthal Rotterdam, at Binnenrotte



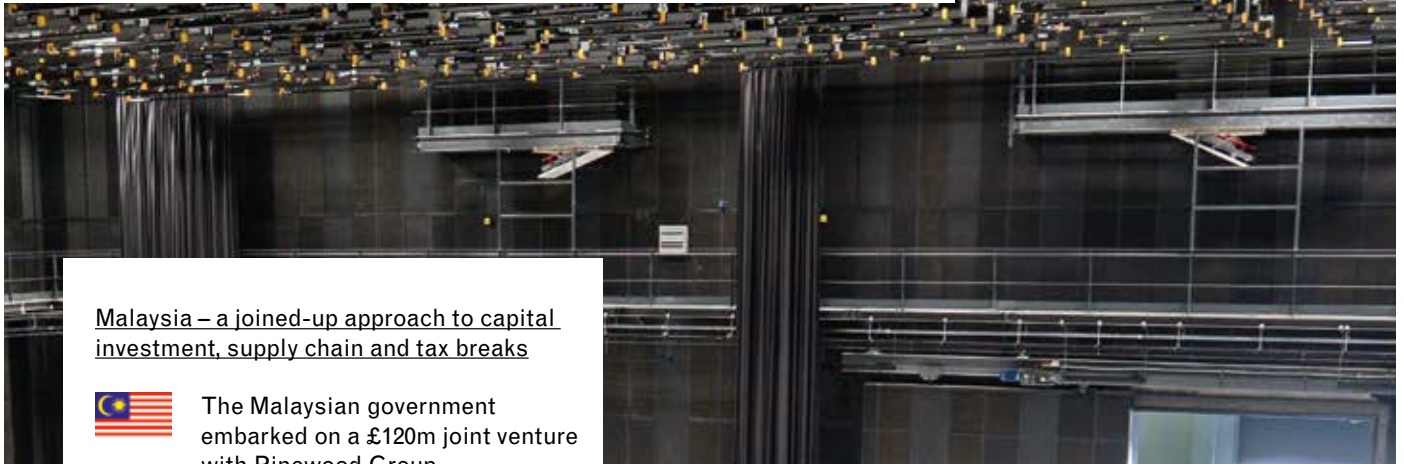
Het Nieuwe Instituut architecture, design, e-culture.

Photos: Ossip van Duivenbode.

Photo: Johannes Schwartz

Tax breaks: risks and rewards

While the Federation strongly believes that tax breaks should complement rather than replace other forms of public support that are better able to encourage risk and innovation, they have been an enormous boost to those UK creative industries who have secured them. But internationally there are both success stories and warning signs; tax breaks that are not integrated into a proper industrial strategy can only function as a short-term measure.



Malaysia – a joined-up approach to capital investment, supply chain and tax breaks



The Malaysian government embarked on a £120m joint venture with Pinewood Group, establishing Pinewood Iskandar Malaysia Studios, to support investment in its film and television industries. The 50-acre site has 100,000 square feet of sound stages and represents the successful export of UK creative services, reflecting in particular the preeminent reputation of the UK's craft skills in film and TV production. The relatively low cost of setting up in Malaysia is enhanced by a Malaysian government offer of a 30% rebate on production and post-production spend for large projects.

Malaysia's joined-up thinking in linking together site set-up and a tax rebate for subsequent productions using the facility may offer some lessons for the UK. Greater coordination between fiscal measures, skills development and capital investment in UK infrastructure could be a spur for higher levels of inward investment, not just in film and television but in digital technology.



One of the 15,000 square ft stages, part of Pinewood Iskandar Malaysia Studios, Johor, Malaysia

Controversy in Canada



Canada's famed tax credits have made a huge difference to the country's creative economy.

The advantage that they give to Canadian creative businesses has long been seen as a direct threat to the UK's ability to create and exploit new intellectual property, particularly in videogames, and were a direct spur to action in Britain.

"The gaming industry in Quebec is armed with a 37.5% tax break. This helped to grow the overall Canadian games industry's workforce by 33% between 2008 and 2010. The gaming sector in the UK has seen 41% of jobs move overseas between 2008 and 2011, with Canada unsurprisingly representing the main destination."
– Creative Nation, CBI, 2014

But businesses may relocate if incentives are taken away. After Nova Scotia dropped its credit, which reduced labour costs by around 50%, the number of TV jobs fell and media concluded that the sector was "a shadow of its former self". When other provinces with smaller film sectors, such as Saskatchewan, dropped their tax incentives, it was the start of sustained decline.



“Every German CEO of a big company in the last two years has travelled to the United States just to see what is happening in Silicon Valley,”

Why German designers think digital is the next challenge

Andrej Kupetz, chief executive, German Design Council



German industrial design is famous the world over, with brands in everything from cars to domestic appliances regarded as gold standards in their fields.

The distinguishing feature, according to Andrej Kupetz of the German Design Council, is that German companies take it as read that design is fundamental to the manufacturing process and crucial to differentiating their products in the market place. There are more than 50 German universities offering courses in industrial design. “Everyone feels that design can help them improve their product and make them recognisable in the world market.”

He dates the concept of industrial design in Germany back to when Rhineland furniture maker Michael Thonet created a process for bending wood in the 1830s. Thonet’s coffee shop chair, which is still in production today, could be disassembled into a few components, creating the potential for the industrial manufacture of a chair for the first time. Today, the relationship between designers and their local manufacturers in Germany is so close that they are invariably located near each other.

Kupetz contrasts the situation in Germany with the UK where, despite our strong manufacturing base, the growth in financial and public services means that designers are more likely to be working in the NHS than a car plant.

Interest in improving efficiency in crafts and better design for industry prompted the establishment in 1907 of the Deutscher Werkbund, the German Association of Craftsmen, which involved young designers/ architects such as Walter Gropius and Ludwig Mies van der Rohe. The modern German Design Council was founded in 1951. It receives no public funding and is supported instead by 260 corporate members spanning every design sector. However, there is government money for initiatives such as promoting innovation in small and medium-sized design companies.

Kupetz says the major challenge for the future is digital and how manufacturers re-conceive their products for the modern world. He gives the example of a heating manufacturer which has traditionally promoted its brand through the very visibility of its boilers and radiators, but faces a new dilemma when all the heating technology is built into a wall and the only customer interface is with an app to control the system.

“Every German CEO of a big company in the last two years has travelled to the United States just to see what is happening in Silicon Valley,” he says. “They are learning how the digital world is now working. They think that’s the future.”

“They are learning how the digital world is now working. They think that’s the future.”



Government expenditure
on cultural services
£ per person, per year



Singapore Night Festival, 2015

Art as infrastructure for the creative industries

Global trends in publicly-supported arts

In the UK, public investment in the arts has been falling. UK government expenditure on culture has dropped by around 26% since its peak in 2007. The intrinsic importance of the arts aside, this sits oddly against an increasing acknowledgement of the importance of the creative economy. It starkly contrasts with other countries, which are investing in the arts because of the social good they effect, their centrality to placemaking and the crucial infrastructure they offer to the creative industries.

SPOTLIGHT: Germany and Singapore

Germany provides a model for stability and investment in cultural policy and the arts. It is the unsung hero of the world's creative industries, with steady growth built on a long-term vision and backed up by consistent funding. Germany has 250,000 creative companies, more than any other country in Europe. These successes are built on strong domestic demand, which fuels the sector and continues to grow. Cinema admissions increased by 14% in 2015, to nearly 140 million.⁹ In 2013, the GVA of Germany's cultural and creative industries overtook that of financial services for the first time.

One factor behind Germany's success is that companies and cultural organisations can build on steady, consistent investment in the sector, allowing them to plan for the future. The chart, left, compares the steady pattern of growth in the German government's investment in culture to the UK's fluctuating approach.

Singapore's ambition to embed the arts in people's lives has brought culture into the heart of major planning initiatives, aiming for growth with genuine engagement. The National Arts Council's 2012 Arts and Culture Strategic Review laid out a vision "to bring arts and culture to everyone, everywhere, every day". This capitalises on Singapore's expanding cultural infrastructure, where a population of five million (the size of Scotland) enjoys 57 museums.¹⁰ An initiative to extend access to culture to groups such as recent migrants or elderly residents who are not part of the country's economic success has been successful with a 50% jump in membership of performing arts interest groups in community clubs and residents' committees between 2013 and 2014.¹¹

But the key challenge for Singapore remains whether arts can truly flourish when freedom of expression remains so heavily circumscribed. This year, Kok Heng Leun, Singapore's Member of Parliament for Arts, called for more creative thinking and argued Singaporeans need to learn to not be offended by art that is more controversial.

Singapore aims to
"bring arts and culture
to everyone, everywhere,
every day"

Creative education and future skills

Education as the missing link in creative industries policy

Creative education and future skills are key issues for Creative Industries

Federation members. In the context of changes to England's current education system, more than three quarters of Federation members thought the issue of current skills shortages was important or very important.

In England, measures to improve academic standards such as the English Baccalaureate (EBacc) are exacerbating an existing divide between STEM and arts subjects and encouraging the view that subjects such as art and design and design and technology are optional extras rather than integral to both cognitive development and the economy. More broadly, across the whole UK, a persistent undervaluing of creative education has led to skills shortages in jobs that many young people would love to do.

The EBacc consists of seven to eight GCSEs that the Government wants 90% of students to take at GCSE (from the age of 14 to 16). These are maths, at least two sciences, English, a language and history/geography. As around a third of students in academies take seven GCSEs or fewer, this means many will be excluded from the arts. This is just the latest in a raft of policy changes that have undervalued these subjects. Despite skills shortages in architecture, engineering and design, the years between 2003 and 2013 saw a 50% drop in the number of students taking GCSE design and technology. There is also a low cross-over between creative and other subjects, with only 5% of those accepted for tertiary education maths and computer science courses having studied A Level art and design subjects.¹²

This trend is confirmed in the most recent data released by exam watchdog, Ofqual, which showed the number of exam entries in arts subjects fell by a further 8% in 2016. Design technology continues to be the most seriously affected subject, with 19,000 fewer exam entries.

Lesson time allocated to the arts up to the age of 14 has been falling since at least 1996, the earliest point for which data is available, clearly denoting a long-term downward trend in the UK.

Creativity is a key skill for the next century.

Problem-solving and other aptitudes that can be developed through the arts are already regularly listed as a crucial skill for employers, but may become even more important in future.

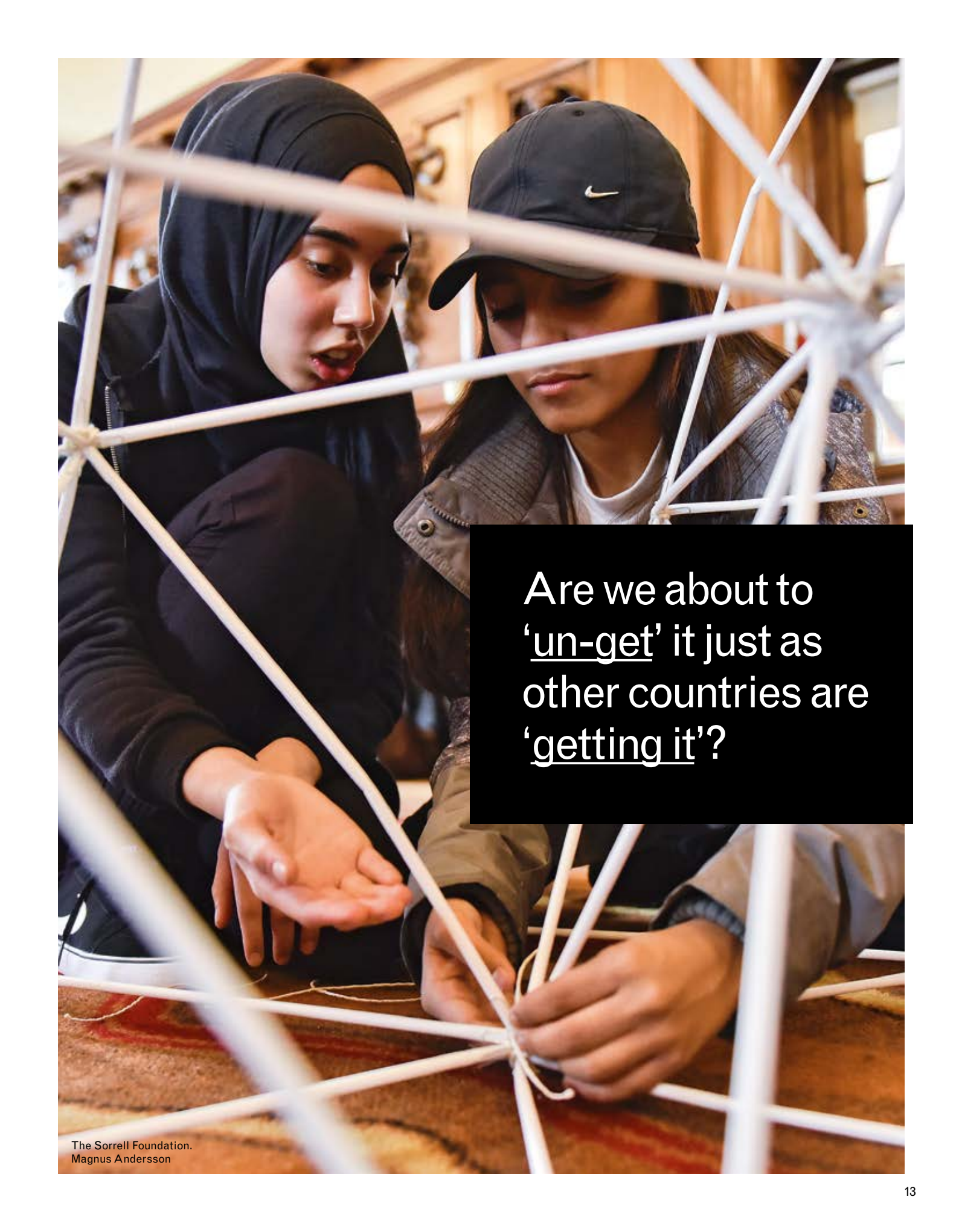
Nesta has suggested that creative jobs are protected from the risk of being replaced by machines as they require skills that are harder to automate.¹³

In short, across the world there is now widespread agreement that the development of design skills as well as other skills learned in creative subjects are crucial not just for the creative industries, but for all business. Are we about to 'un-get' it just as other countries are 'getting it'?

“Overall, social skills – such as persuasion, emotional intelligence and teaching others – will be in higher demand across industries than narrow technical skills”

“Overall, social skills – such as persuasion, emotional intelligence and teaching others – will be in higher demand across industries than narrow technical skills, such as programming or equipment operation and control. Content skills (which include ICT literacy and active learning), cognitive abilities (such as creativity and mathematical reasoning) and process skills (such as active listening and critical thinking) will be a growing part of the core skills requirements for many industries.”

The World Economic Forum (2016) – Ten skills to thrive in 2020.

A photograph of two young women, one wearing a black hijab and the other a black Nike cap, focused on constructing a geodesic dome structure. They are using numerous white sticks connected by thin white threads. The woman on the left is pointing at a joint, while the woman on the right is actively working on it. The background is a warm, wooden interior. A black text box is overlaid on the right side of the image.

Are we about to
'un-get' it just as
other countries are
'getting it'?

Embedding culture in the curriculum

Three approaches: in Finland, Scotland and China

Some countries are making significant changes that embed the arts and creativity into education. Finnish education is often hailed as a model, producing excellent results with a system notable for the autonomy of its teachers and an absence of testing. Like the rest of the UK, Scotland's education policy has undergone significant and almost constant change in recent decades, which has made it difficult to measure success, but embedding creativity in the curriculum is now a clear policy target. In China, too, the national government has made a strong commitment to the arts, even if the results are patchy.

Finland's 2,000-hour rule



In Finland, the arts are guaranteed from ages seven to 16 for a certain number of hours per week, equating to 2,128 lesson hours across these nine years of basic education.

The curriculum also builds in space for play, rest and reflection. Typically, students and teachers take a 15-minute break after every 45 minutes of instruction, allowing them to recharge but also develop social and creative skills.

Teachers are given autonomy to shape the student experience themselves. This approach is considered a possible reason for the country's consistently high PISA results (an international benchmarking of young people's attainment). And, importantly, teaching is highly paid and well regarded. Teachers are granted greater freedom to design their own courses based on guidelines from a central curriculum, with school inspections abolished in the 1990s. There are also few standardised tests. The focus is on learning, not testing, and most students will be examined for the first time at age 17. Teachers are responsible for their own assessments.

What this has meant

The strong Finnish education system is widely viewed to have contributed to the significant economic success of its creative economy. 8.2% of Finnish jobs are in the creative industries, higher than here in the UK (when using comparable definitions)¹⁴, which does prompt questions as to whether this approach would be a better way for the UK to develop the skilled workforce we need.

Scotland's national plan for creativity



In Scotland, the UK's devolved education policy means that responsibility for education at all levels sits with the Scottish Parliament and the Scottish Government's Education and Lifelong Learning Department. Students take Nationals rather than GCSEs and the EBacc is not applied.

Scotland's national education plan, the Curriculum for Excellence, aims to embed creativity in the classroom. A supporting Creative Learning Plan recognises the importance of creativity to economic success.

Although levels of success cannot yet be measured, the Curriculum for Excellence aims to encourage interdisciplinary experiential learning. The curriculum tries to embed creativity in the classroom, beyond 'traditional' arts subjects, for three- to 18-year-olds. The plan is cross-authority so includes Creative Scotland as well as other education-focused organisations. It sets out the importance of creativity "to shape our future as a country, we need to create and be creative".

This shift is of particular significance because, historically, creative subjects are less well subscribed in Scotland than in other parts of the UK. Around 9% of Higher entries are in creative subjects. In England and Wales, A Level entries in these subjects are 15%.

What this has meant

The Creative Learning Plan was only launched in 2013 and its impact so far is difficult to measure. A 2015 evaluation is generally positive but cautious about the level of success.¹⁵

China's one in five hours policy



In China, national government has set recommendations that one in five school hours be spent on the arts as a country famous for its mass manufacturing wakes up to the potential of the creative industries.

With rival nations such as Vietnam and Indonesia eroding its large cheap labour force advantage and with new, style-conscious domestic consumers, the ministry of education set new targets in 2014 for at least 9% of total teaching hours in compulsory education between the ages of five and 15 to be dedicated to the arts. It ruled arts education should take up more than 20% of time in junior high school (ages 13 to 15).

The recommendation demonstrates the country's serious intention to rival the creative industries of other nations, including the UK, by building a more creative workforce. However, there are several hurdles to implementation.

While the ministry establishes the priorities, education provision is devolved to provincial departments which can make it difficult to enforce national policy. Some parents and schools view the arts as time-consuming and relatively low status while a strong culture of testing means higher education entrance examinations are prioritised. Nonetheless, some long-established programmes ensure students who excel at arts subjects can gain extra credits to go to university.

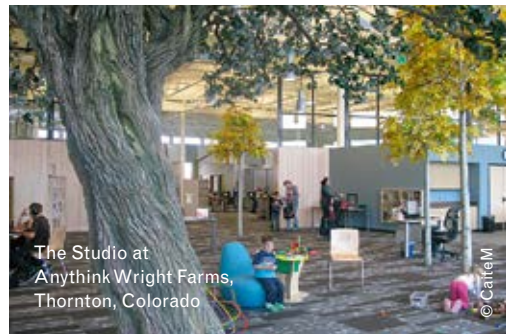
What this has meant

There is strong evidence of huge growth in arts and participation, alongside growth in applications for higher education in China and beyond. Beijing Film Academy received 25,000 applications for just 500 places in 2015. Between 2010 and 2015, the number of Chinese students studying arts subjects in the USA increased by 218%¹⁶ Later in this journal we consider the impact of this on the UK higher education system.

SPOTLIGHT

Colorado becomes the world capital of Hanging Out

Hang Out, Mess Around, Geek Out, or HOMAGO, is a theory of how young people learn and interact with media and technology, and how this helps them to build their creative capacity. In Thornton, Colorado, these theories have been adopted by a range of libraries. The flagship library Anythink Wright Farms is home to The Studio, a digital learning lab designed specifically for HOMAGO learning with open spaces giving room for experimentation. The approach is now being integrated into all new libraries across the city.



Bremen's orchestra in a school

The Deutsche Kammerphilharmonie, the orchestra in the German port city of Bremen, rehearses in one of the city's comprehensive schools. The school has spaces with the appropriate high-level acoustics, plus a recording studio and sound-proofed rehearsal rooms, paid for by a combination of trusts and foundations and earned income. The orchestra uses its new premises to engage the school and the entire community and so develop new and effective ways of communicating classical music.



Higher and further education: Is the UK becoming the world's creative finishing school?

UK higher education institutions have thrived in a globally competitive market.

According to QS University Rankings, which identifies the world's strongest universities, the UK offers 12% of the top courses for subjects that are directly related to the creative industries. This puts us in second place behind the United States, which was the top performer. Australia, in third place, illustrates the dominance of English-speaking western nations in this ranking.¹⁷

Much of the demand for places is coming from overseas

In the last decade, higher education has become increasingly globalised. Between 2000 and 2010 the number of students outside their own country grew at more than 7% per year.¹⁸ For the UK, demand from overseas students wanting to study creative, arts and design subjects at UK universities has increased by nearly 50% in just four years. Surveys of international students identify the reputation of our institutions as the key factor drawing international students to the UK.¹⁹

Growth in international demand for arts and design courses in the UK

Total applications from international students					
2012	2013	2014	2015	2016	
22,350	24,800	28,360	30,720	32,110	

International as percentage of all applications					
2012	2013	2014	2015	2016	
10%	11%	12%	12%	13%	

Future growth in international students will be from Hong Kong, Singapore and Malaysia

The majority of international students choosing to study in the UK in future are unlikely to be from Europe. Around 90,000 Chinese students are now coming each year

for creative subjects, with even more for engineering and medicine. Countries such as Hong Kong and Singapore have the highest rates of growth.

International student numbers and average growth rates by country of origin²⁰

	2014-15	Average annual growth 2012-15
1. Hong Kong	16,215	11.4%
2. Singapore	7,295	10.1%
3. Malaysia	17,060	6.7%
4. China	89,540	3.4%
5. United States	16,865	1.9%

Universities becoming more international creates new challenges

The international students studying arts or creative subjects in the UK – 16% of the total – bring new ideas and funding for UK institutions and could provide employers with an educated, international workforce ideally suited to reach new markets.²¹

But this potential benefit is arguably negated by visa regulations that limit opportunities for overseas students to continue their careers in the UK. In 2012, the post-study work visa that had allowed students to stay and work for two years after graduation was scrapped. A new visa for entrepreneurs was introduced, requiring capital of £50,000.

In contrast, other countries have developed policies to liberalise visa rules to attract international students. This raises the prospect of the UK's world leading creative education providers becoming finishing schools for overseas students. These students' talent will then bolster the competitiveness of the very businesses against which UK companies will be fighting for future contracts. This problem is likely to be exacerbated by the UK withdrawing from the EU.

New trends in education

Globally, new initiatives are looking to develop creative skills needed for the jobs of the future. What are leading institutions doing to make sure that their students stay ahead?

1) Giving students a purpose for studying

To give students control of their own learning, some schools and universities are now setting students briefs, not teaching them 'subjects' in a traditional sense. Often these come with a mission or a challenge, ensuring young people leave education with a portfolio of applied skills.

At Stanford University, the 'Missions not Majors – 2025' visioning process builds on the university's long history of such work, especially at their d.School (design school): *"'I'm a biology major' was replaced by 'I'm learning human biology to eliminate world hunger'. The goal was to help students select a meaningful course of study while in school, and then scaffold a clear arc for the first 10 to 15 years of their professional lives. It wasn't about the career trajectory, but the reasons behind it."*²²

2) Online courses show enormous potential to reach millions

Around 35 million students around the world are now enrolling in MOOCs (Massive Open Online Courses) each year.²³

Some cultural organisations have developed impressive partnerships. For instance, the Tate has an ongoing partnership with the Khan Academy, a free online course provider for all ages, with around 100,000 users.²⁴ However, the wider sector may be missing out. With just 7% of

MOOC courses in art and design subjects compared to 10% in computer science alone, there is clearly greater potential.

3) Giving teachers room to teach

A number of governments have begun to allow teachers greater freedom to manage learning in their classroom, based in part on the success of hands-off approaches in countries like Finland.

Alberta, Canada, has one of the highest-rated education systems in the world. From around 2002, it placed increased emphasis on supporting teacher-designed innovation in the classroom, in part by allocating 2% of the education budget to allowing teachers to collaborate with each other. A similar programme in New York found collaboration resulted in maths scores 6% higher.²⁵

In the UK, much of the rationale for the move to academies in secondary and now primary education has been to allow freedom to bring more innovation into schools. Research for the Department for Education suggested this was one of the benefits of chains of academies, as they created clusters of engaged heads who could network together and develop innovations.²⁶ But there is a question mark over whether this is benefiting pupils, especially given new, quite prescriptive assessment measures.

Notes

- 1 BOP analysis of DCMS Creative Industries Statistics
- 2 Latest comparable data from 2003-2012
- 3 PwC (2015) Global Entertainment and Media Outlook 2015-2019
- 4 Based on UNCTAD data for 2012, converted at current prices
- 5 BOP Analysis of UNCTAD data; based on 2013 data (most recent available)
- 6 BOP analysis based on UNCTAD trade data (2003 – 2013; latest available). Ranked by growth rate; filtered to exclude countries with recent growth in GDP of below 1%. Some areas with recent conflict e.g. Egypt were excluded
- 7 <http://geloookahead.economist.com/the-creative-economy-2/>
- 8 OECD's 2012 PISA test
- 9 European Audiovisual Observatory (2016) World Film Market Trends
- 10 World Cities Culture Forum (2016)
- 11 Singapore Cultural Statistics (2015) report
- 12 OECD (2013) Art for Arts sake?
- 13 Nesta (2015) Creativity vs Robots
- 14 Nesta (2015) Creative Europe: measuring the creative industries of the EU
- 15 Consilium (2015) Evaluation of the Creative Learning Plan
- 16 World Education Services (2016) Mobility Monitor
- 17 Based on synthesis of number of top universities in relevant subjects (architecture and built environment; art and design; communication media) in QS University Rankings
- 18 Higher Education Statistics Agency (2016) Statistical First Release 224
- 19 Universities UK International Unit (2015) International Undergraduate Students: The UK's Competitive Advantage
- 20 Higher Education Statistics Agency (2016) Statistical First Release 224
- 21 Higher Education Statistics Agency (2016) Statistical First Release 224
- 22 Read more at www.stanford2025.com/purpose-learning/
- 23 Find out more about MOOCs: [http://www.thecompleteuniversityguide.co.uk/distance-learning/moocs-\(massive-open-online-courses\)/](http://www.thecompleteuniversityguide.co.uk/distance-learning/moocs-(massive-open-online-courses)/)
- 24 <http://www.tate.org.uk/research/research-centres/learning-research/in-progress/khan-academy-project>
- 25 Professor Carrie Leana (2011) 'The Missing Link in School Reform', Stanford Social Innovation Review
- 26 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/325816/DFE-RR359.pdf

The UK Government is proud to promote our creative industries as the greatest in the world.

But particularly at a time of political and economic uncertainty, we should be looking over our shoulder at those countries that have learned from - and are keen to emulate - our success.

**Creative.
Industries.
Federation.**



London Assembly Regeneration Committee: Investigation into culture-led regeneration in London

19 July to 5 September 2016

The London Assembly Regeneration Committee is looking at how far culture-led regeneration can help expand London's artistic and creative offer, particularly in outer London, and regenerate areas into new creative places.

Culture-led regeneration is about working together with artists, businesses and the community to invest in arts and creativity in an area. By bringing together diverse groups of people with a creative vision, culture-led regeneration aims to help artistic communities, support arts venues and inspire local people, as well as improving the local economy and improve quality of life.

We want to hear your views on this process and how far you think it will benefit London's culture, economy and communities. Responses can be sent until Monday 5 September 2016.

Follow our investigation at twitter.com/LondonAssembly using the hashtag #creativeLondon. To receive a Word version of this document and to ask any questions, please email regenerationcommittee@london.gov.uk.

What is the name of your organisation? *

Creative Industries Federation

What type of organisation are you? *

Membership organisation (including Business Improvement Districts)

Contact email address

eliza@creativeindustriesfederation.com

Questions

What are the main issues facing arts organisations and businesses in London?

In his campaign to be mayor of London, Sadiq Khan pledged to “to ensure that decision makers in Westminster, Brussels and elsewhere hear the voice of Europe’s biggest commercial centre” and to promote “the city’s cultural riches – our fashion, music, design, film, art and architecture – to Londoners, the rest of Britain and the world”.

London has the highest percentage and number of creative industries jobs in the UK. It is a global centre for the sector, and the mayor must take a leadership role in the country’s policy in regards to this sector in Westminster and beyond.

Although there are some areas where the sector requires movement at national government level, there are many policy issues where the Greater London Authority should make positive changes, and even more areas where the mayor should use his position to put pressure on central government to protect the interests of (particularly) the many small and medium sized businesses that bolster the city’s economy.

In this document we will address:

- The cost of living and working
- Funding and Local Authority spend
- Skills shortages
- Visas and freedom of movement

In terms of specific regeneration projects, we know that many of our members are either making their own submissions, or are already working with the relevant local authorities on proposals. This submission aims to give the GLA a sense of the wider priorities and concerns of the sector with some concrete actions that can be taken by the mayor and the GLA.

The cost of living and working

The rising cost of space in London has an effect on many other industries - but is multiplied for many small creative businesses or artists, who need both living and studio space and so are doubly affected by the high price of living. The city needs these artists and young creatives - both because they make the city an attractive and interesting place to work and live, and because these are often businesses which grow quickly and pay back into the economy this way. If spaces are not made available, the city will lose these important benefits.

POLICY RECOMMENDATION: We suggest that the mayor urgently addresses the need for affordable workspace. This should be a key element of the London Plan from early drafts as a key area of policy for the future of the sector and the capital.

POLICY RECOMMENDATION: The GLA should classify affordable workspace for the creative industries as 'infrastructure', as an essential support to the capital's creative economy. This would allow them to apply for CIL funding.

POLICY RECOMMENDATION: The GLA should provide robust direction on the development and implementing workspace provider lists at borough level to ensure that charitable as well as commercial providers secure the appointments.

Funding and Local Authority Spend

There are issues at local authority level including funding of the arts and local authority spend that the mayor can provide direction on. The raw materials of the creative industries, including the publicly supported arts, are talent and ideas. Therefore, investment in innovation and R&D across the creative industries is essential for economic and employment growth.

Even sectors that appear strictly commercial such as IT, software development and digital games rely to some extent on public investment for growth - 37% of video games businesses depend on public grants and government financial schemes. So the issue of funding is not just about the arts - but about the entirety of our interrelated sector.

We believe that the city mayor should assume a leadership role in encouraging local authorities to grow their creative industries by investing in the vital infrastructure that supports them. The danger is that short-sighted decisions on cutting arts funding and other infrastructure investment risk damaging job creation and economic success in a sector with enormous potential for expansion. In the case of London an individual council decision might put the city's wider creative economy in danger.

POLICY RECOMMENDATION: The London mayor should assume a leadership role in advocating the importance of funding the creative industries, and in particular the arts both at borough and at a national level. The mayor should investigate and highlight best practice in London.

Skills shortages

The creative industries have longstanding skills shortages. These stem from inadequate training and provision at school and university in this country compounded by the ever-greater need for talent in a growing sector. In his manifesto Sadiq pledged to “Establish a tech talent pipeline, through the Skills for Londoners task force, following the model developed by Bill de Blasio in New York, with more young people enabled and encouraged to gain key digital skills, and more apprenticeships in the sector. In particular I will ensure more girls are supported to develop tech skills, so that we can turn around the underrepresentation of women in tech jobs”.

In order to do this, he will need to look at the talent pipeline more broadly - and at what is happening at a national level. The lack of relevant tech skills is met and accelerated by the drop in students taking design and art subjects. Engineering and tech sectors have both shown that - in particular - women are more likely to go into these sectors if encouraged to learn technical and creative subjects together. If we want to fill our greatest skills shortages - listed in the National Shortage Occupation List - in industries like animation, engineering (see our work with the engineering sector: http://www.creativeindustriesfederation.com/assets/userfiles/files/CIF_EduAgenda_spreads.pdf) and VFX, as well as encourage more women to pursue technical subjects, then the mayor will need to advocate for arts and creative subjects too.

More broadly, as technologies change quickly - with innovation happening all over the world, rather than confined to a few states - there is a need for London foster as many links with those who might be at the genesis of new ideas as possible and to encourage them to interact with the city (whether by moving to it or sharing innovative ideas) and develop those new technologies here.

With London holding almost a third of all of the UK’s creative economy jobs (28.2%) and 30.8% of the creative industries, it is perhaps more urgent for the capital than for any other part of the UK to think about how to make sure they are able to fill the new jobs that are being created.

Despite the need for arts subjects in a range of careers across several industries, entries for GCSEs in arts and creative subjects have fallen by 46,000 this year compared with last, according to official statistics published by exam watchdog Ofqual [<http://www.artsprofessional.co.uk/news/exclusive-arts-schools-plummets-new-figures-show>]. The steep decline is in sharp contrast to some other GCSE subjects, notably those included in the English Baccalaureate (EBacc) – the suite of subjects on which the Government judges school performance, which excludes arts subjects. Academies do not now have to offer any arts subjects, from eleven, to still qualify as ‘Outstanding’ schools.

POLICY RECOMMENDATION: London can send out a message to the national Government that they are serious about addressing this education and skills crisis. One first step in doing this would be to have a design/engineering/architecture module in the London Curriculum aimed at 13-14 year olds. This would mean that those students taking the module would have the opportunity to discover some of the wide range of jobs that utilise the combination of technical and creative skills. It also has a value in acting as a blueprint for other cities and devolved

regions, who can use it to ensure that they too are encouraging students to think about careers in these sectors.

POLICY RECOMMENDATION: As education policy continues to be devolved, there will be many more opportunities to address the skills gap - but, as London benefits from creative talent from across the country, the skills shortage will not be truly addressed until national policy is changed. The mayor should therefore become a vocal supporter of the importance of creative subjects at school and higher education and put pressure on national government to change existing policy, as well as academy chains within the capital. The mayor should make clear that there is a serious economic case for these subjects, as well as a holistic case and one around life chances - and that it is unacceptable that schools with no arts provision from 11 years old can be judged as 'outstanding' by Ofsted. The EBacc subjects (which include maths, English and science but also modern foreign languages and humanities) might be facilitating for some students, but for many students across the capital they will not be the right choices - and by pushing them away from subjects which they could flourish at, the policy may diminish individuals' career possibilities. They should work on this with key stakeholders, including the Creative Industries Federation.

These skills shortages will be exacerbated by changes to **freedom of movement as a result of Brexit**. Changes to the visa system can only currently be made by the home office, but there have already been calls for a London-only visa system by the London Chamber of Commerce. Part of the mayor's election campaign manifesto was to "Challenge unfair visa rules which make it harder for London businesses to bring in the world's best talent, who in turn create future opportunities for Londoners". The EU referendum vote has made this more important than ever before.

The creative industries are not only reliant on European talent to supplement our own but as more than half of our creative industries exports go to Europe, freedom of movement within the EU has allowed us to build workforces that help us better represent and understand our market. Currently 6.1% of our sector across the UK comes from Europe. Loss of this talent could hurt the sector.

Our sector is also disproportionately made up of freelancers and SMEs, who are less likely to be able to sponsor talent. By losing out on a diverse group of freelance designers, computer engineers, architects and more, we will be inhibiting the growth of this sector more than any other.

Existing visas already do not fit the needs of our sector at large. For example, there is no freelance visa while the entrepreneurial visa (which could, in theory, be used by a creative to set up a one-person contract-based business) requires £50,000 of investment funds. This reduces the number of those able to come to do the jobs with the greatest shortages. The reliance on salaries in measuring who can get a visa can also be problematic, as in our sector there is not necessarily a correlation between pay and skill level.

There is also concern around the way in which London and the UK more widely is seen by those who might work and study here. Already further education and higher education institutions are reporting a

reduction in applications for courses given prospective students' uncertainty as to their eligibility for both visas and EU fee rates after Brexit comes into effect - which for three- or four-year course students may be before they complete their studies. This not only causes greater skills shortages, but will impact the financial performance of many UK educational institutions. There is an opportunity for the creative sector to remind international talent about the vibrancy of London.

POLICY RECOMMENDATION: The mayor needs to make the creative and technology sectors (particularly small businesses and startups) a key consideration in any lobbying on visa provision. Large businesses will always be able to sponsor talent - and so small businesses should be the priority in thinking and advocating for immigration reform. The Mayor should support the development of a model for a freelance visa (more information on request) to allow highly skilled freelancers into the capital.

What role should culture play in regeneration projects? What opportunities are there for regeneration to help expand London's cultural offer?

There have been high-profile uses of culture as an essential part of regeneration. In 2008 Liverpool, as the European Capital of Culture, received 9.7m additional visitors, which meant more than £735m of additional spend in the capital.

In the first edition of our international journal we also looked at other city-based projects that have been based around the creative industries and culture - from Cluj in Romania to Rotterdam in the Netherlands.

Culture must be an essential part of any regeneration attempt - but investment must be sustained and dependable rather than piecemeal. And regeneration which positively works for an area means providing affordable housing in a sustainable way for artists and creative start-ups. Putting in public art is not enough. If the arts are not being enjoyed by everyone - starting at school but including participation right the way through - then social divides will only be increased.

In the culture-led regeneration projects you have worked on or seen, what worked or didn't work about the approach taken? How could the process and outcomes have been improved?

To help with our investigation, please name the projects unless you are unable to do so.

n/a

How do you work with the community and local organisations on artistic projects or culture-led regeneration? What barriers are there to working in partnership with other organisations or building networks with local communities?

n/a

In the long term, what are the main threats faced by artistic communities and partnerships?

n/a

What support have you received or would you like to see to manage these threats?

There are many significant threats created by the UK leaving the EU. The Creative Industries Federation is currently working on a comprehensive list of what these are, and what the sector will require coming out of the future negotiations. The GLA will be provided with this list. For more information contact eliza@creativeindustriesfederation.com.

Are you happy for us to contact you about being a possible media case study?

Yes

A full list of responses will be published on the London Assembly's website (london.gov.uk/assembly) following the conclusion of the investigation. *

You may wish for your response to remain confidential. Please note that should a request be received under the provisions of the Freedom of Information Act (2000) for the full list of responses, confidential responses will also have to be shared.

I am happy for my response to be published

SUBMIT

Wandsworth Consultation on Employment and Industrial Land Use Local Plan Document

Susie Gray, Cultural Planning Manager, Enable Arts, 16.11.2016

Enable L&C is Culture and Leisure provider for Wandsworth Council.

Enable Arts is pleased to provide comments regarding Wandsworth Council's consultation on Employment and Industrial Land Use as part of the Local Plan for Wandsworth, covering employment premises and industrial land. We are pleased to see and support AECOM's recognition, that the identified need for more offices and a similar amount of industrial land over the next 15 years in the borough, should protect and make provision for space and facilities for the cultural and creative sector including affordable creative workspace.

AECOM's study makes various recommendations, including:

- Continuing to promote the VNEB OA as a strategic employment hub, including the provision of high quality units and flexible working space that would be suitable for creative and cultural businesses;
- Retaining (most of) the designation for land as Strategic or Locally Significant Industrial Areas, which (amongst other things) provide accommodation for the 'heavier' creative industries;
- Encourage growth sectors – including knowledge-based, creative and cultural businesses – in areas of currently or formerly under-used industrial land (Nine Elms, the Focal Points, parts of the Central Wandsworth and Bendon Valley LSIA's).

We strongly encourage robust recognition of the need to retain, protect and provide for new cultural and creative space provision in the Local Plan. In addition we would support creation of policy more specifically focused on the needs of the sector.

Please note that when using the term 'artist/s' we are referring to those who are professionally engaged in the wide range of creative practices which include but are not limited to the visual arts, performance, dance, digital, sound, film etc.

Across Wandsworth borough

Wandsworth has a growing creative workforce, about to be boosted through for example the arrival in 2020 of Apple HQ at Battersea Power Station. Wandsworth also has a varied small to mid scale cultural offer such as a pub and community theatre, small public art gallery, performing arts centre. It also has a number of cultural education hubs including the RCA, RAD and ALRA. The borough however provides very little currently by way of affordable creative workspace or affordable artists studios. Nor does it currently offer any large scale cultural venues whether theatre, music or large scale gallery or museum. This may change through the regeneration of Nine Elms, through area strategy rather than borough policy.

We anticipate however, that the data provided above for creative workers in the borough to be below real figures. This is because many arts, cultural and creative workers are freelance and work from home. This is likely to be, in part, due to rising cost and lack of availability of suitable local workspace.

The cultural sector

According to the Creative Industries Federation the cultural sector, is 'the UK's fastest

growing sector since 2008'. As the national membership body for all the UK's arts, creative industries and cultural education, the CIF argues that this is a huge opportunity for government and policy-makers to embrace our sector's power and potential. 'The creative industries are worth more than £87.4bn in GVA to the UK and the creative economy employs one in every 11 working people' (DCMS Sectors Economic Estimates, DCMS, August 2016). It is often taken for granted that Britain is a creative nation, but the Creative Industries Federation say emphatically that this success is not random.

CIF comment on the government's proposed UK Industrial Strategy includes relevant points. <http://www.creativeindustriesfederation.com/assets/userfiles/files/Industrial%20Strategy.pdf>

Data provided by AECOM, in relation to cultural and creative industries show that the sector provides for a significant number of jobs and is growing. It identifies that arts, entertainment, recreation and similar services contribute some 6,500 jobs to the borough (about 5.6% of the total jobs) and that this has grown by about 3.4% between 2009 and 2014. The creative economy sub-sector provides some 3,700 jobs and has grown significantly – about 27.3% over the same time frame. Evidence in the study suggests that these sectors (as well as the information and digital knowledge sectors) are under-represented in the borough and could represent a growth opportunity. This is supported by the finding that the borough also tends to be a small firm economy, with 93.2% of businesses having between 1 and 9 employees (compared to 90.1% for all of London). The premises survey identifies clusters of creative industries and established hubs, but also that some of these are potentially vulnerable to redevelopment to other uses (eg the Old Imperial Laundry).

Artists and Makers Studios

Retention, protection and provision of artists' studios are especially threatened as outlined in 'The Artists' Workspace Study', 2014. This predicted the loss of 30 per cent of artists' workspace in London by 2019⁽³⁾ leaving some 3,500 creatives without workspace in the capital. The booming residential market and liberalisation of planning regulations have resulted in hundreds of artists forced out of their workspaces and many out of the city https://www.london.gov.uk/sites/default/files/artists_workspace_study_september2014_reva_web_0.pdf

What cultural and creative industries need to thrive

Issues that are particularly relevant to the arts and cultural sector and community, are:

- providing appropriate space for creative and cultural industries which are fit for purpose
- the affordability and availability of business spaces
- clustering with other CI/cultural organisations to achieve a greater level of success

In many cases, artists and cultural businesses are distinct, with their own specific needs. Many are very small scale, freelance or require subsidy to provide incubator space or to allow for low turnover entities such as artists' studios, to thrive.

The then Deputy Mayor of Culture for London Muinra Mirza said “With London’s population due to reach nearly 10 million in the next decade, affordable workspace has become a key issue, putting particular pressure on creative small businesses, which includes artists. Whether showcasing fashion designers to international audiences, funding new apprenticeships in animation, promoting the capital’s design businesses or lobbying for the preservation of creative hubs, the Mayor’s office is intervening across the creative industries to ensure that London remains a capital of cultural content.” (Artists Workspace Study, Report and Recommendations, Sept 2014, MOL). This work continues to be a priority for the GLA under the new Mayor.

There are financial challenges for creative and cultural organisations which include some of the following. There are often particular design requirements for premises such as sprung floors, sound proofing, storage needs, front and back of house, rehearsal space, ‘dirty space’ for creation and production, vehicle access for loading, sometimes 24hour access, public access. In many cases these mean additional costs for fitting out which can be prohibitive on top of high rents and sometimes service charges. Clustering with other cultural and creative organisations is useful for networking and to create a focus and can also provide a way to share staff, resources and facilities to reduce costs. Some cultural organisations need to carry out un-neighbourly operations (such as being noisy or needing to operate outside standard work hours) and being located in industrial rather than residential areas can facilities this.

Key to thinking, is to understand that CIs operate within an wider ecology, with a pipeline that extends beyond workspace considerations. Access to facilities and space play a key part in that ecology. In order to sustain and grow the UK’s hugely successful creative offer and ambition, talent must be nurtured throughout education and through supporting young people into careers and to develop creative practices. Smaller and freelance creative practices and production then feed the professional talent pipeline and supports London and the UK’s international reputation. Without fit for purpose affordable cultural spaces and creative workspace built in to London’s working fabric, this pipeline will be pushed out of the city and the city will be the poorer for it.

Opportunities and Benefits

Opportunities for developing cultural spaces and affordable creative workspace alongside new development are being progressed in the borough, mainly in Nine Elms where an area wide Cultural Strategy has been established. This could more effectively be progressed, here and in other parts of the borough, with more robust policy in place to support and encourage, and ensuring costs are worked into development viability at the outset. The ability to secure spaces on peppercorn or reduced rents, on long leases and with fit out cost contributions greatly supports an organisation’s ability to bear relocation and development costs, and the increased costs of running new and sometimes larger spaces and service charges. This then allows for a greater focus on and investment in the community benefit they are able to bring such as education, training or broad contributions to the area’s cultural life.

The National Federation of Artist Studio Providers, states in ‘The Growth and Future of the Affordable Studio Sector’; Affordable studio providers and their member artists achieve

substantial social benefit through their work with many different local, regional and national organisations and agencies - in education, training and community development - to encourage creativity, individual development and address social exclusion, offender, health and learning issues.

Given that cultural provision impacts positively on community cohesion, education, neighbourliness, wellbeing and place making, ensuring robust provision in policy is strategically sensible in any local authority and town planning agenda, which seeks to support the creation of healthy cities and tolerant, resilient communities.

Smaller cultural organisations and artists are also important for their local area, enriching the cultural life in general for residents, workers and visitors and supporting local, regional and national cultural investment. Small theatre productions which are written, rehearsed and produced in the borough, will go on to be presented publicly in smaller theatres such as Theatre 503, Putney Arts Theatre and within the annual Wandsworth Arts Fringe. Local and visiting audiences will eat, drink and shop in the area, providing custom for other local business. These smaller organisations and practitioners, then feed the wider cultural life of London – in particular developing and growing relationships with the strategically important cultural organisations that make the centre of London unique and going on to tour beyond.

The NFASP 2010 Survey reveals that 75 per cent of all studio organisations provide activities that benefit the public. Regardless of their size, staffing and organisational status (i.e. whether they are a charity or not) studio groups are committed to delivering a wide range of activities for and with the public. Nearly all studio groups are involved with exhibitions open to the public, while the majority run open studios events and around half run practical workshops on and outside of the premises and are involved with public art projects.’ NFASP argue that artists help to make creative communities. <http://nfasp.org.uk/resources>

Threats and Risks

In the borough, where planning policy has not to date been robust enough, cultural and creative space is being lost. An example is at Ransomes Dock in Battersea. Despite being located beside a significant creative cluster (RCA, Vivienne Westwood, Foster etc), the grouping of creative entities in the large warehouse space beside the Thames has been cleared for redevelopment with no promise of re-provision. Those who were forced to leave in late 2015 (despite the site remaining closed) included Doodle Bar and Testbed (a thriving hub for creative events, exhibitions and performances); a small gin distillery, a small boxing centre, and digital and design agencies. Artists’ studios managed by ACAVA in Wandsworth Town have been able to locate in two consecutive pre-development spaces, but are again about to lose their current home with no obvious alternative at the same rental level in the borough. Creative uses in spaces which do not have a D1 use class are especially vulnerable.

Such is the threat to cultural and creative space in London, the GLA is currently exploring creation of a Creative Land Trust to support London’s artists through affordable creative workspace across the capital. A consortium of entrepreneurs and philanthropists, known as ‘**Studiomakers**’, are convening to tackle the problem of rising rents in the capital to ensure that artists and creatives are able to flourish and help to maintain London’s status as the world’s cultural capital. The Creative Land Trust will provide faster financing for studio providers looking to buy their buildings, and will be able to hold property for use as

permanent affordable workspace for artists. A taskforce on creative workspace has been created which will make a series of recommendations later this year, including setting up a Creative Land Trust to secure studio buildings permanently across the capital.

Planning Policy
Housing and Community Services
Wandsworth Council
London
SW18 2PU

Our ref: SL/2006/100015/OT-06/PO1

Your ref: Email

Date: 03 November 2016

planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

Wandsworth Local Plan: employment and industry review-policy options

Thank you for consulting the Environment Agency on the above. Little consideration is given to flood risk in this review. A number of the sites identified are in Flood 2 and 3 of the Environment Agency's Flood Map for Planning. Some sites are also immediately adjacent to the River Thames, Wandle and Beverley Brook. Opportunities should therefore be sought to achieve betterment as part of any redevelopment.

We would wish to see the document take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan. It should also reflect the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.

The TE2100 Plan includes improvements to the flood defence system, environmental enhancements and landscape improvements. The plan should seek all opportunities to ensure that these enhancements are provided in a fully integrated way. All riverside works need to be sensitive to riverine features, and opportunities must be taken wherever possible to improve the river environment through these works and to integrate flood defence arrangements into the design of new riverside developments.

It's essential the review of site allocations help to deliver resilience to a changing climate. New and existing infrastructure across the borough such as bridges, roads, railways and electricity sub stations should be carefully designed, located and maintained to remain safe and operational during a major flood event or drought.

We have attached the consultation questionnaire below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

Charles Muriithi, MRTPI
Planning Specialist

Kent and South London
Direct dial 0203 263 8077
Direct e-mail charles.muriithi@environment-agency.gov.uk

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL
03708 506 506

kslplanning@environment-agency.gov.uk

www.gov.uk/environment-agency



Consultation questions

Question 1

Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

The GLA Economics forecast indicates that office-based employment will grow from 13,000 jobs to 14,900 jobs and across the wider region including Wandsworth and nearby boroughs, GLA Economics predicts that employment for office and industrial jobs will both expand.

Question 2

What impact would the decision to leave the EU have on the preferred growth scenario?

No comments

Question 3

Do the findings of the ELPS and other recent evidence in any way undermine the strategic objectives set out in section 6 above?

No comments

Question 4

Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

Wandsworth Employment Land and Premises Study 2016 points out that the future supply is complicated by the influence of PDR with the potential loss of local/sub-regional office space in the borough measuring around 48,600m². Potential loss could impact significantly on the provision of space to support local businesses.

Question 5

Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?

No comments

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

Question 7

Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

No comments

Question 8

Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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No comments

Question 9

Are there any other sites or areas within other LSIA's that should be prioritised?

No comments

Question 10

Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?

The study recommends that to help meet wider strategic objectives the Council could consider a change of use away from industrial employment uses at some SIL/LSIA's industrial/warehousing clusters, through release from these designations by redesignating for a mix of uses including employment.

Question 11

Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

The study points out that the supply of industrial land in LB Wandsworth has contracted over the past 15 years and in particular over the past five years and planned release of industrial land at VNEB OA, will see this provision fall further. Contraction means that there are fewer sites which can accommodate industrial activities so where demand exists – as a consequence of employment growth, displacement or relocation - the Council should look to intensify industrial provision on existing sites, where suitable.

The borough falls under the Thames Estuary 2100 (TE2100) **Wandsworth to Deptford** policy unit: Policy P5, to ***take further action to reduce flood risk beyond that required to keep pace with climate change***. The Wandsworth to Deptford policy unit extends from Wandsworth to Nine Elms and includes residential areas (mainly high rise flats) with riverside paths, commercial and industrial premises with no public riverside access, and Battersea Park. The tidal defences extend along the lower reach of the River Wandle in Wandsworth.

The ground level in much of the policy unit is low (at between 0 and 2m AOD) whereas the level on the Thames frontage is generally higher (typically 4m AOD). Thus there would be great difficulty evacuating floodwater should flooding occur. In some areas the defence line is integrated into buildings with a riverside walkway that is liable to occasional flooding.

It is important that requirements for safeguarding land are incorporated into the plan to inform Thames riverside development.

The flood defences in Wandsworth are generally 'hard defences' consisting of masonry, concrete or steel sheet pile walls. They could generally be raised within the existing defence footprint (or with only a small increase in width). However the structures would be tall, unattractive and would restrict public access and views of the estuary. Additional space will be needed when the defences are raised both for the defence engineering works and also for other enhancements such as suitable public access. Land is also required for maintaining, replacing and improving the flood defences.

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 10 metres. More space may be required especially if wider requirements are to be achieved.

However this will depend on the particular site, the defence type and proposed riverside improvements, and should be discussed and agreed with the Environment Agency. There is scope in Wandsworth for local flood defence realignments to achieve landscape, public amenity and environmental enhancements, for example at new development sites. Where realignments of the existing defences are envisaged, land will be required including an allowance for future defence raising.

Question 12

Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

We support the study recommendation that to help meet housing and wider regeneration objectives, including specific place-making aims in Wandsworth over the plan period the Council should continue to permit a change of use away from industrial employment at some particular locations.

We recently responded to the Lombard Road/York Road riverside focal point SPD consultation pointing out the need of the plan to incorporate the Thames Estuary 2100 (TE2100) Plan requirements. We are pleased to note that sites with a tidal Thames frontage will address the requirements of the Thames Estuary 2100 (TE2100) plan to ensure the necessary level of protection is provided for their lifetime.

Question 13

Should the clusters and sites identified above be protected for industrial and distribution uses?

No comments

Question 14

Should this include specific protection for such uses located in railway arches?

Question 15

If so, should the Local Plan allow change or redevelopment to non-industrial uses provided that there is no demand for the industrial or distribution use? Should redevelopment of these sites prioritise alternative employment uses?

No comments

8.45 Looking at the overall quantity of industrial land that the Employment Land and Premises Study recommends for re-designation and comparing this to the demand forecasts:

Question 16

Are there reasonable justifications for exceeding the low growth demand forecast, either for individual sites or cumulatively? Should any of the sites recommended for

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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re-designation in the Employment Land and Premises Study be retained for industrial and distribution use?

No comments

Question 17

Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

As noted above, in some areas the defence line is integrated into buildings with a riverside walkway that is liable to occasional flooding. Actions involving cross-boundary working between local councils should therefore consider the following:

- A consistent approach to improving the flood defences at the boundary between the London Borough of Wandsworth and the London Borough of Richmond. This should include collaboration on flood management and other improvements to the Beverley Brook.
- A consistent approach to improving the flood defences and the riverside at the boundary between the London Borough of Wandsworth and the London Borough of Lambeth at Nine Elms.

The River Thames is a designated 'main river' and under the jurisdiction of the Environment Agency for its land drainage function. Any works in, over, under or within 16 metres from the landward extent of the flood defences, requires permission from us under the terms of the Environmental Permitting Regulations. For further information please visit: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Please be aware that the River Wandle and Beverley Brook are designated 'main rivers' and under the jurisdiction of the Environment Agency for their land drainage functions. Any works in, over, under or within eight metres of the top of bank or river wall, where one exists, requires permission from us under the terms of the Environmental Permitting Regulations. For further information please visit: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Question 18

Should the Local Plan seek to protect offices in the following locations: Town Centres; The part of the Central Activities Zone that is in Nine Elms; Focal Points; Smaller office clusters near transport interchanges or on the edge of town centres?

No comments

Question 19

Are there other parts of the borough where existing offices should be protected?

Question 20

Should the Local Plan seek to protect B1a and A2 uses located above shops and outside protected shopping frontages? If so, which locations would be most appropriate to protect?

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

www.gov.uk/environment-agency

Question 21

Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

Yes

Question 22

Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

No comments

Question 23

Are there specific sites in or on the edge of the borough's town centres, or in the other areas listed above, that have the potential to contribute to the demand for local and sub-regional office floorspace?

No comments

Question 24

Are the areas listed above the most appropriate for new office development?

We encourage growth that can be supported by the necessary environmental infrastructure, for instance water resources and flood risk management provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands.

Question 25

Are there other areas or sites that the Local Plan should seek to designate for new office development?

No comments

Question 26

Should the Wandsworth gas holder site and the former bingo hall site in Bendon Valley be re-designated as Employment Intensification Areas, seeking increased quantities of employment floorspace alongside other uses?

We consider that the council would want to address the impacts of past and future land uses, ensuring that these do not affect the health of people and the environment. Land contamination and remediation is the subject of planning and other regulatory regimes. The key to the successful development of brownfield land is early and continual engagement between landowner, developers, the council and the regulators.

Question 27

Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?

No comments

Question 28

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

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Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?

No comments

Question 29

**What quantity and mix of floorspace and uses could these areas provide?
Should this include housing provision alongside employment uses?**

Question 30

Should the reviewed Area Spatial Strategy and site allocations address all or some of the following issues?

**Pedestrian and cycle access to the Thames from Wandsworth Town Centre;
Access to the Wandle;
The creation of new public spaces and routes through the area;
Enhancement of the Wandle and its banks as a resource for wildlife;
Biodiversity and environmental issues;
Layout of development;
Mix and arrangement of uses across the area;
Use allocations for individual sites;
Analysis of the historic environment and character of the area;
Place-making initiatives such as cultural uses and activities.**

The review should address all the issues listed. The TE2100 Plan includes improvements to the flood defence system, environmental enhancements and landscape improvements. The plan should seek all opportunities to ensure that these enhancements are provided in a fully integrated way. This is in line with the wording of Action Zone 0, Recommendation 16 of the TE2100 Plan which states:

"Many of the defences are adjacent to or part of important heritage assets, habitats and landscapes. All riverside works need to be sensitive to riverine features, and opportunities must be taken wherever possible to improve the river environment through these works and to integrate flood defence arrangements into the design of new riverside developments". The provision of enhancements to the riverside will:

- Improved public access along the estuary for pedestrians and cyclists.
- Improved public access to the estuary including the foreshore for public amenity purposes including boating.
- Improved public amenity facilities including parks, public open spaces and viewpoints.
- Landscaping to improve the appearance and public experience of the riverside.
- Improved biodiversity

The focus of our future approaches to flood risk management in the Wandle Catchment will be to maintain and preserve this open river corridor as this is vital for us to be able to manage the increased likelihood of flooding in the future. There are of course areas within the Wandle where development within the floodplain and along the river are a cause for concern and here we will be seeking to change the character of the urban footprint through

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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redevelopment. The Wandle catchment is largely developed floodplain with some flood defences.

- These are urban catchments with many of the associated flood risk issues (rapid run-off, large-scale encroachment onto the floodplain and modified watercourses). However, they do have sufficient features (river corridors, open space and natural watercourses) that provide the potential to adopt a more sustainable management of flood risk in the future.

- A priority in these catchments is to maintain river corridors and safeguard existing open space so that the potential to reduce the probability of flooding in the future remains.

- There is still a high level of flood risk from a variety of sources in these catchments. Regeneration and re-development of some areas offers an opportunity to reduce the risk; for example through the layout and design of new development.

Flood risk in the Wandle catchment can become even more severe when the tide is high, preventing the fluvial river water to flow into the River Thames and causing backing up of surface water and road drains. This has the potential to occur in places remote from the watercourse and floodplain. Our aim here will be to gain a more complete understanding of surface water and drainage related flooding so that any future improvements are part of a wider strategy for addressing these sources of flooding.

When spatial strategies and site allocations include an area of watercourse such as the River Wandle, they should always include:

- Enhancement/restoration of the River Wandle for wildlife
- Creation of space/buffer habitat to the river
- General increase in biodiversity through the creation of public spaces, particularly along the riverside areas.
- Aim for public access that creates positive engagement with the river, but where possible the inclusion of some inaccessible/quiet areas of the riverside would help create pockets of 'undisturbed' habitat, particularly needed for breeding birds and mammals.

Question 31

Are there any additional issues that should be addressed through the Area Spatial Strategy and site allocations?

Climate Change Allowances

Recent updates to climate change allowances may have an impact upon development sites in terms of flood risk. The [National Planning Practice Guidance](#) refers planners, developers and advisors to the Environment Agency guidance on considering climate change in Flood Risk Assessments (FRAs). This guidance was updated in February 2016 and is available on [Gov.uk](#)

The guidance can be used for planning applications, local plans, neighbourhood plans and other projects. It provides climate change allowances for peak river flow, peak rainfall, sea

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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level rise, wind speed and wave height. The guidance provides a range of allowances to assess fluvial flooding, rather than a single national allowance. It advises on what allowances to use for assessment based on vulnerability classification, flood zone and development lifetime.

Waste

Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.

Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health.

Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Improved waste management can also contribute to reducing greenhouse gas emissions, including through the use of waste materials to generate renewable energy.

River basin management plans

We updated the river basin management plans in December 2015. This was accompanied by a host of supporting data and information available in a variety of different formats. We have produced a look-up guide to help you navigate the data and information that makes up and is related to the river basin management plans and guide you to the detail you are interested in. Many of the maps available to download are in GEOpdf format. This is an interactive pdf which allows you to turn layers on and off as required to view the data on. Please click on the link below:

<https://www.gov.uk/government/publications/river-basin-management-plans-accessing-data-and-information-guide>

Surface water management

All the proposed site allocations offer opportunities to improve surface water drainage by incorporating Sustainable Drainage Systems. Development at these sites should be informed by the latest environmental good practice and deliver high standards of sustainable design and construction. All sites over 1 hectare should demonstrate how surface water will be managed in a Flood Risk Assessment in discussion with your drainage engineer. The council is the Lead Local Flood Authority.

Question 32

Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

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All allocations that have a riverside area would ideally include a detailed site allocation to help guide redevelopment. This is particularly vital to ensure that riverside/banks restoration takes place and sufficient land is allocated as biodiversity habitat and public open space

Question 33

Do the proposed routes and spaces set out in the adopted Area Spatial Strategy give the optimal arrangement for the area? Are there alternative approaches that should be explored?

No comments

Question 34

Should a similar area spatial strategy and/or site allocation be set out for the former bingo hall site in Bendon Valley? If so, are there issues specific to this site that these should address?

No comments

Question 35

Should the Local Plan continue to specify requirements relating to design, rent levels, leasing and management of new employment premises? If so, are there any requirements that should be set in addition or instead of those given above?

No comments

Question 36

On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor?

Are there other design and management issues that should be taken into account for large-scale mixed use schemes?

We have developed a guide for developers which is an essential tool to use during every stage of development. It provides advice on making sure development contributes to the long-term environmental quality. The increasing impacts of climate change mean this is more important now than ever before. In this guide we give practical advice on each of the environmental issues that may affect a site. This ranges from how to reduce flood risk through to creating quality green space in a development. We give pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. We've also provided examples of sites where this good practice has already been applied.

We have updated our advice for developers and it is now a joint agency document with advice from Environment Agency, Natural England and Forestry Commission, it's available to view on our website: <https://www.gov.uk/government/publications/planning-a-guide-for-developers>

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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Question 37

Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

No comments

Question 38

If so, should this floorspace be of a particular type or size?

No comments

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

No comments

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

No comments

Question 41

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

No comments

Question 42

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

No comments

Question 43

How should affordable workspace be secured – for example through s106 agreements?

No comments

Question 44

Should managed workspace (see below) be considered to be affordable, or are there other criteria that should be set – for example setting a maximum percentage of market rent?

No comments

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

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Question 45

Should the Local Plan require managed workspace to be provided on new developments in the borough?

No comments

Question 46

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

No comments

Question 47

How should managed workspace be secured – for example through s106 agreements?

No comments

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

No comments

Question 49

Are there other designations that would be more appropriate for the Havelock Terrace area?

No comments

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

No comments

Question 51

Should the Local Plan allow residential uses in any part of the SIL?

No comments

Question 52

Are there opportunities for further consolidation of industrial and other uses in the SIL? If so, how can this be realistically achieved and how would it contribute to intensification of employment uses, improvements to access and upgrading the quality of the public realm in and around the SIL?

No comments

Question 53

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

No comments

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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Question 54

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within Locally Significant Industrial Areas?

No comments

Question 55

Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in Locally Significant Industrial Areas?

No comments

Question 56

Should the Local Plan continue to protect the function of New Covent Garden Market (following the implementation of the consolidation project recently granted planning permission)?

No comments

Question 57

Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?

No comments

Question 58

Should any additional criteria be included, for example demonstrating that the premises are vacant, or marketing the premises for redevelopment including an employment element?

No comments

Question 59

Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?

No comments

Question 60

Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?

No comments

Question 61

Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?

No comments

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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Question 62

Are there other places or situations in which alternative uses for redundant employment premises should be restricted?

No comments

Question 63

Should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review?

No comments

Question 64

Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?

Yes. We would like to see the right waste and resource management infrastructure is in place. Businesses and other organisations should reduce the impacts of their activities on air, land and water, using resources efficiently and minimising waste disposal and manage their waste responsibly.

The relationship between planning and other regulatory regimes

We regulate waste management through a system of permits under the Environmental Permitting Regulations (EPR). Planning and permitting decisions are separate, but closely linked. Planning permission determines if a development is an acceptable use of land. Permitting determines if an operation can be managed on an ongoing basis to prevent or minimise pollution.

The NPPW (para. 7) confirms that WPA's should... 'concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities.'

The Environment Agency has three main roles in waste and industry regulation:

- We are the main organisation responsible for the regulation and permitting of complex industrial processes and waste management activity in England, through the application of statutory regimes (such as the Environmental Permitting Regulations).
- We are responsible for tackling serious illegal waste activity.
- We are an advisor to Government and local councils on waste and waste infrastructure planning. We provide data and information on waste, waste management and environmental pressures and limits to help them with their work and decisions.

Question 65

Should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review?

Yes

Question 66

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

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Do the policy options set out in the sections above accurately reflect the evidence base?

Yes

Question 67

Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?

For other most up to date and accurate environmental evidence we recommend using Open Gov Data service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. Please see the link for more detail: <http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login>

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

www.gov.uk/environment-agency

Development, Enterprise and Environment

John Stone

Head of Forward Planning and Transportation
Wandsworth Council
Planning and Development Division
Housing and Community Services Department
The Town Hall
Wandsworth High Street
London SW18 2PU

Our ref: LDF32/LDD08/BS01

Date: 11 November 2016

Dear John

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

Re: Wandsworth Local Plan: Employment and Industry Review Policy Options

Thank you for consulting the Mayor of London on your Local Plan Employment and Industry Review Policy Options regarding its general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Representations from Transport for London (TfL) are set out in Annex 1.

The policy options document provides an opportunity to ensure that Wandsworth's industrial and employment land is managed in an efficient and effective way to meet the borough's needs for the Plan period, in line with London Plan policies 2.17 and 4.4 and the associated Land for Industry and Transport Supplementary Planning Guidance (SPG).

Responses to the questions in the document are set out below.

Question 1

Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

GLA response:

It should be noted that the reference to the GLA Economics forecast in para 8.6 is not the latest forecast and it should be made clear that the forecast referred to is for 2014. The document should clarify whether the 13,000 jobs referred to is the number of office jobs in the borough at 2014 and in particular it should state whether this number refers to absolute jobs or a net change. The London Office Floorspace projections (2014) based on the GLA Economics forecast April 2013 expected an additional 16,000 jobs for the borough, with growth between 2011 and 2036 expected to rise from 26,000 to 42,000 jobs.

More recent forecasts published by the GLA in June 2016 expect higher total employment growth in London and it would be useful to know how these will bear on Wandsworth's evidence base.

London office floorspace projections for the borough are close to Wandsworth's estimate of 44,000 sqm for 2011 – 2036, however, these figures are out of date (2013) and we are anticipating overall stronger growth in London as a whole.

Wandsworth is in the borough level grouping of 'Restricted (with exceptional planned release)' for transfer of industrial land to other uses in the London Plan Map 4.1. The addition of 'exceptional planned release' to Wandsworth's 'Restricted' borough grouping was made to provide for the release of SIL in the Vauxhall, Nine Elms, Battersea Opportunity Area. According to research by AECOM for the GLA, Wandsworth has already released 27ha of industrial land in the five years between 2010 and 2015. Further release of SIL is expected through the redevelopment of Nine Elms. Taking into account Nine Elms and other planned releases in the pipeline a total of 40ha land anticipated to be released during the Plan period (and exceeding the indicative Wandsworth benchmark for SIL release in the Land for Transport and Industry SPG which is 41ha for 2011 – 2031). It is considered therefore that the borough's 'central growth' scenario would be more in line with the Land for Transport and Industry SPG indicative benchmark and is the growth scenario supported.

Question 4

Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

GLA response:

The Strategic Industrial Location designation is supported. Locally significant industrial areas are supported where justified by evidence in the employment land review.

Question 5

Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?

GLA response:

Any industrial areas the borough considers merits designation as SIL should meet criteria set out in the Land for Industry and Transport SPG, and new areas of SIL would need to be designated first in the London Plan.

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

GLA response:

Yes, in principle.

MAP 8.2 Locally Significant Industrial Areas

GLA comment:

It would be useful if the sites on the map were labelled

Question 9

Are there any other sites or areas within other LSIA's that should be prioritised?

GLA response:

The borough should be mindful of the Land for Industry and Transport SPG benchmark for industrial land release. Any further LSIA land release should be considered for mixed use where viable, exploring the potential for intensification and/or co-location of industrial activities with other uses.

Question 10

Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?

GLA response:

Yes, if this is justified in the Council's Employment Land and Premises Study (ELPS) evidence.

Question 11

Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

GLA response:

Yes, in principle. It would be useful to know which other sites are within the Nine Elms area.

Question 12

Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

GLA response:

The borough should be mindful of the SIL release benchmark and look at opportunities for re-providing more modern industrial floorspace compatible with residential uses where viable to enable the retention of some industrial uses in these areas.

Question 17

Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

GLA response:

The borough could look at the feasibility of intensification of industrial uses and, where appropriate, co-location with other uses as part of mixed use development. The potential for relocations should be considered with neighbouring authorities in the relevant property market areas and take into account impacts on employment, supply chains, congestion and London's economic function, including servicing the Central Activities Zone.

Question 18

Should the Local Plan seek to protect offices in the following locations:

- **Town Centres;**
- **The part of the Central Activities Zone that is in Nine Elms;**
- **Focal Points;**
- **Smaller office clusters near transport interchanges or on the edge of town centres?**

GLA response:

Yes, subject to demand. It would be useful to provide a description or definition of a 'focal point'.

Question 20

Should the Local Plan seek to protect B1a and A2 uses located above shops and outside protected shopping frontages? If so, which locations would be most appropriate to protect?

GLA response:

We would suggest looking at viability and taking a balanced approach to retaining B1a and A2 functions above shops whilst taking steps to realise the potential for more comprehensive mixed use development including housing.

Question 21

Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

GLA response:

We support this approach.

Question 22

Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

GLA response:

A pipeline of office space will make a valued contribution to the borough's office floorspace stock at borough level, as well as providing for the national and international role of office space in the CAZ.

Question 24

Are the areas listed above the most appropriate for new office development?

GLA response:

Yes, they should also have regard to office guidelines in Annex 2 of the London Plan.

Question 25

Are there other areas or sites that the Local Plan should seek to designate for new office development?

GLA response:

This would not be supported as in general terms the focus for office development should continue to be the CAZ, town centres and accessible locations on the edges of town centres.

Question 35

Should the Local Plan continue to specify requirements relating to design, rent levels, leasing and management of new employment premises? If so, are there any requirements that should be set in addition or instead of those given above?

GLA response:

We welcome approaches which set criteria for the design, leasing and management of new employment premises to support SMEs. See also response to Question 41.

Question 36

On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor? Are there other design and management issues that should be taken into account for large-scale mixed use schemes?

GLA response:

We would support this approach.

Question 37

Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

GLA response:

As a general principle, we would support provision of employment floorspace in regeneration initiatives. Large scale town centre uses should be in line with the Town Centre first approach as set out in paragraph 8.62 (and see response to Question 24).

Question 38

If so, should this floorspace be of a particular type or size?

GLA response:

See answer to Question 37 above. In addition, we would support types and sizes that are viable and that complemented other uses such as residential.

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

GLA response:

This approach is in line with the Mayor's current thinking and is set out in "A City for All Londoners", the Mayor's new vision for London. The Local Plan should seek creative workspace, including affordable in large scale employment developments where this is viable and to ensure a balance approach to provision of employment space in the borough.

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

GLA response:

This would be supported and is in line with London Plan policy 4.6. Boroughs are encouraged to enhance and enable cultural quarters, particularly in areas of regeneration such as the former Ram Brewery.

Question 41

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

GLA response:

This approach would be supported as it is in line with the Mayor's current thinking and is prioritised in "A City for All Londoners", the Mayor's new vision for London.

Question 43

How should affordable workspace be secured – for example through s106 agreements?

GLA response:

Affordable workspace can be secured through s106 agreements or through direct provision if on council-owned land.

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

GLA response:

It would be useful to have a map showing the boundary of the Havelock Terrace area in the document. In recognition of its relationship to Nine Elms, designating Havelock Terrace area as Industrial Business Park would be supported in principle, subject to further details of the boundary.

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

GLA response:

Because of its particular role in providing sustainable distribution and other support services to the CAZ, it is recommended that other parts remain as Preferred Industrial Locations in line with London Plan Annex 3.

Question 51

Should the Local Plan allow residential uses in any part of the SIL?

GLA response:

To allow residential uses in any part of the SIL would be contrary to London Plan policy 2.17.

Question 52

Are there opportunities for further consolidation of industrial and other uses in the SIL? If so, how can this be realistically achieved and how would it contribute to intensification of employment uses, improvements to access and upgrading the quality of the public realm in and around the SIL?

GLA response:

Any opportunities for intensifying industrial activities in line with London Plan policy 2.17 would be supported.

Question 53

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

GLA response:

All of the listed uses are SIL compliant and opportunities to intensify these uses would be supported.

Question 54

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within Locally Significant Industrial Areas?

GLA response:

All of the listed uses are SIL compliant and opportunities to intensify these uses would be supported.

Question 55

Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in Locally Significant Industrial Areas?

GLA response:

This would be in line with the Land for Industry and Transport SPG and should continue where this is supported by evidence of demand.

Question 56

Should the Local Plan continue to protect the function of New Covent Garden Market (following the implementation of the consolidation project recently granted planning permission)?

GLA response:

This would be supported in line with paragraph 4.24 of the London Plan which “seeks to retain an efficient wholesale market function to meet London’s requirements. Redevelopment of any of the markets should not compromise opportunities to consolidate composite wholesale markets to meet London’s long term wholesaling needs at Western International, New Covent Garden and New Spitalfields.”

Question 57

Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?

GLA response:

The Land for Industry and Transport SPG has the same criteria and therefore these criteria would be supported. It is suggested that these criteria be applied to sites outside of SIL to avoid ad hoc planning applications for non-industrial uses in SIL.

Question 58

Should any additional criteria be included, for example demonstrating that the premises are vacant, or marketing the premises for redevelopment including an employment element?

GLA response:

These additional criteria would reflect those in the Land for Industry and Transport SPG and would therefore be supported.

Question 60

Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?

GLA response:

Restrictions on alternative uses for premises should be made subject to local demand for Town Centre uses and demonstrate viability. Alternative uses should ensure active frontages are maintained.

Question 61

Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?

We suggest having regard to guidance in Table 1.1 of the CAZ SPG which sets out priorities attached to housing relative to office and other strategic functions in the CAZ.

Question 63

Should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review?

GLA response:

We would support the current wording and review of these policies as part of the full Local Plan review.

Question 64

Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?

GLA response:

The sites allocated for waste management in the adopted SSAD 2016 should be retained in line with London Plan policy 5.17.

Question 65

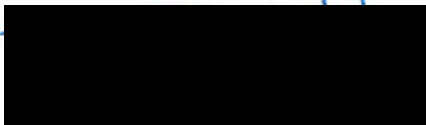
Should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review?

GLA response:

We would support the current policy approach to wharves and the existing safeguarding allocations of the borough's wharves in line with London Plan policy 7.26 and a review at the time of the full Local Plan review, informed by any review undertaken by the Mayor.

If you would like to discuss any of the representations in more detail, please contact Brianne Stolper (020 7983 4286) who will be happy to discuss any of the issues raised.

Yours sincerely,



John Lett

Strategic Planning Manager

cc Leonie Cooper, London Assembly Constituency Member
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

Annex 1: Comments from TfL

With regard to matters concerning the above consultation, TfL has the following comments:

8.2.2 Strategic Industrial Location

Question 6: Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

The GLA group considers that the existing designation of the Queenstown Road area should be retained as SIL. If the Council was minded to consolidate parts of the SIL, the transport and public realm requirements for different uses should be assessed as part of any decision to de-designate. Changing the designation for housing or co-location of employment and mixed use would create new opportunities to deliver homes and investment in transport and public realm. However it would also create different demands on the transport network which would need to be understood, and should be considered as part of the solution. TfL is considering through its work on the London Plan an approach which seeks to maximise development opportunities in areas that are well served by stations and transport corridors. This principle applies to all industrial designations.

The Nine Elms Partnership has invested heavily in public realm design guidance and cycle strategies for the Opportunity Area. In considering the future of this area, every opportunity should be taken to improve pedestrian and cycling connectivity. This is particularly important with large pieces of infrastructure affecting north-south and east-west movement.

8.2.3 Locally Significant Industrial Areas

Questions 7-10

The borough has adequately acknowledged TfL's proposals for the Wandsworth Town Centre gyratory system in their policy options for the gas holder sites and other sites within the town centre. Although the reconfiguration of the gyratory is likely to involve significant land take from the east side of Putney Bridge Road and a relatively small widening of Wandsworth Plain, these areas appear to be outside the current review of employment and industrial land. Thus, provided the new road alignment is secured, TfL considers the re-designations within the town centre and the gas holder site would not impact on the gyratory removal scheme.

The gyratory removal scheme should however be clearly reflected within the consultation and policies around the re-designation of these sites and the potential for improved links across sites reflected.

With regard to the Bingo Hall, any development coming forward consequent to re-designation, should submit a Transport Assessment (TA). Appropriate mitigation will be secured through section 106 agreement / CIL. Currently local bus routes in the area have capacity constraints.

8.2.4 Nine Elms

Question 11: Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL.

Any effort to improve cross connectivity in the area is supported. Dependent on the scale of re-designation in Nine Elms, an element of transport assessment may be required. This would update the transport study undertaken as part of the Opportunity Area Planning Framework (OAPF).

8.2.6 Industrial clusters and undesignated sites

Question 13: Should the clusters and sites identified above be protected for industrial and distribution uses?

Question 14: Should this include specific protection for such uses located in railway arches?

With regard to converting railway arches along Winthorpe Road, TfL has been looking to convert arches directly opposite East Putney station on Upper Richmond Road. An improvement programme for the arches is subject to be implemented over the next few years. TfL Commercial Property will be responding separately with an update on this project.

8.3.1 Employment Protection Areas

Question 18: Should the Local Plan seek to protect offices in the following locations:

- Town Centres;
- The part of the Central Activities Zone that is in Nine Elms;
- Focal Points;
- Smaller office clusters near transport interchanges or on the edge of town centres?

When designating land for office clusters, the council are encouraged to have a clear policy on transport accessibility and parking, reducing reliance on the car. This should be reflective of London Plan policy. Focusing activity into areas of good and excellent accessibility is strongly supported.

8.5.2 Large-scale Mixed Use Development

Question 36: On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor? Are there other design and management issues that should be taken into account for large-scale mixed use schemes?

Co-location of uses, particularly in areas of excellent accessibility should be encouraged. This should not just be limited to office uses, but often other industrial uses such as light industrial or storage and distribution uses can work together with residential. Clear policies can help frame design principles that developers can adopt. TfL would be keen to work with the council on this aspect, particularly in the light of the Mayor's commitment through City for All Londoners to explore intensifying development around stations.

8.7.1 Queenstown Road SIL

Question 48: Should the Havelock Terrace area be designated as Industrial Business Park?

It is understood that the borough is proposing to re-designate sites in the Havelock Terrace area from Strategic Industrial Land (SIL) to Industrial Business Park (IBP). From a highways perspective, there is

no objection to this designation, however detailed transport assessments will be required with individual planning applications or at an area wide scale to consider changes of use.

Summary

In summary, we hope these comments are useful in informing the Local Plan. The gyratory removal scheme should be clearly reflected within the consultation around the re-designation of sites in and around the town centre and the potential for improved links reflected. Considering pedestrian and cycle connectivity in Nine Elms is important through this work, an element of transport assessment may need to be undertaken in this area dependent on the scale of re-designation which would update the transport study undertaken as part of the OAPF. With regard to, the designation of office clusters, clear policies concerning transport accessibility, parking and reducing reliance on the car are required. Focusing activity into areas of good and excellent accessibility is highly encouraged together with co-location of uses which should not just be limited to office uses. Clear policies can help frame design principles that developers can adopt. We would be keen to work with the council on this aspect. Subject to the above, TfL would be happy to meet with the Borough to discuss these matters further.



HOUSE OF COMMONS
LONDON SW1A 0AA

20th October 2016

Dear Mr Stone,

Local Plan: Employment and Industry Review – Policy Options Consultation

As the local MP for Putney, I have seen our local businesses face some challenges over the years with office to residential, and retail to residential conversion, through use of Permitted Development Rights by developers, often at the cost of small local businesses. This has been particularly prevalent in the central Putney area, but also more recently in Southfields as well. We have some great employment and industrial spaces locally and I welcome this review which seeks to ensure that the Local Plan for Wandsworth offers a suitable level of protection for these spaces.

The Strategic Objectives as set out in the Core Strategy 2016 are very much still relevant and I would encourage an even greater emphasis on ensuring that the LA safeguards land and buildings for business use, including provisions for protecting existing thriving businesses, such as the local independent shops on Wimbledon Park Road shopping parade. The promotion of flexible use business space provision is also very much welcome and in areas such as central Putney where office space has been lost to residential conversion, space which can be share-managed would be welcome to tackle low occupancy in buildings.

Section 8.49 of the consultation document highlights that had all prior approval application been implemented, Putney town centre would have lost around 48,500 sq ms of office floorspace. There is a challenge here to encourage and attract businesses to base their offices in Putney given the good transport links, proximity to the town centre and nearby open spaces. Given the Employment Land and Premises Study indicates a trend towards future strong demand for new office floorspace, I agree that the Local Plan should seek to protect offices in Town Centres and office clusters near transport links, such as those on Upper Richmond Road.

I note the Council are intending to implement an Article 4 direction to assist in retaining office space where there is demand, and the sooner the better, although there is a sense that by the time this is implemented, provision will already have been reduced dramatically. I would strongly urge the Council to also look at implementing an Article 4 direction to remove Permitted Development Rights from class A1 to C3 in local shopping hubs such as those in Southfields. The shop frontage protection which currently exists is very much welcome, but does provide a loophole which developers can exploit, allowing basement extension which will render some businesses unviable.

Section 8.4.2 looks at the need for additional office floorspace at a time where Putney has seen a huge amount of its office space converted to housing units. I very much welcome the Council's intention to carry out a detailed assessment of sites around Town Centres and the areas as specified in 8.62. I would urge caution when looking at redesignation of industrial space, as this often tends to be in areas set back from town centres and further away from transport links thus, not necessarily attractive for office use.

In terms of the Area Spatial Strategy, I would agree this should include aspects such as pedestrian and cycle access; mix, use and layout of developments and historical analysis of character, however environmental issues such as the enhancement of the Wandle should perhaps be managed in a separate document covering environmental issues and biodiversity.


Looking at development requirements (8.5.1), the Local Plan should continue to specify requirements relating to design to ensure that high quality development is secured. Prescribing rent requirements also means that developers cannot price-out local business in favour of larger corporations. I would ask the Council to consider whether parking can be considered as part of the management of new employment floorspace as this has been an issue that has cropped up with new developments in Putney, though broadly we should be encouraging the use of public transport.

In terms of large-scale mixed use developments, where there is demand for more office space, the developer could be allowed to put forward a case for use of further units for B1 use, whilst ensuring a minimum level of C3 units per build. This should be done on a case-by-case basis, where there is clear demand for further business use space. The Local plan should require the design of the development to demonstrate cohesion between the retail and business use floors, whilst ensuring enough segregation so that residents are minimally disturbed during business hours. Major regeneration initiatives should be encouraged to include provision of employment floorspace, as employment opportunities and thriving business are very much a part of what makes regeneration successful to support the local offer. This floorspace should not be ascribed to a certain type, however developers should be required to demonstrate the demand for the type applied for.

Rising business costs are something which local businesses in Putney, Wandsworth and Southfields have all raised with me, so I very much welcome the suggestion that the Local Plan ensures affordable workspace provisions in the borough. It does not necessarily follow that these should be in specific areas, although there is perhaps rationale for an allocation in regeneration areas to promote this type of business use. Managed workspace is potentially a good way to achieve this, although this type of scheme would only work where there is sufficient demand for it. It might be that the best way to ensure a suitable amount of affordable workspace is to proportion a certain number of units based on the specific needs of that area. This also ties in with 8.8.1 whereby this could be used as a tool to encourage business use whether by affordability rates or managed workspace, to help prevent employment space redundancy as we have seen in central Putney. Where redundancy of employment space has been demonstrated, broadly some space should be retained for business use where it adds to the economic viability of the surrounding area, however if a redundant office unit is located in a residential area, there should be some degree of flexibility for conversion to residential use, where contextually this would be more appropriate.

I think it is vitally important to protect employment and industry space locally, whilst being sympathetic to surrounding space use. This review presents an opportunity to look at areas which currently aren't covered by local policy, or where further protection is needed, which I very much welcome. I look forward to the publication stage of the consultation.

Yours sincerely,



Justine Greening MP



Health and Safety Executive

Wandsworth Council Policy and transport – Environment and Community Services Town Hall Wandsworth High Street LONDON SW18 2PU ATTN: JOHN STONE – HEAD OF PLANNING AND TRANSPORT STRATEGY		Hazardous Installations Directorate John Moran CEM HD5E 2.2 Redgrave Court Merton Road BOOTLE L20 7HS Tel: 0151 951 4551 LOCAL.PLANS.CEMHD.5@hse.gsi.gov.uk http://www.hse.gov.uk/ Mr J Neilson – Head of Unit
Date	10 October 2016	

Dear Sir/Madam

CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY HSE

**WANDSWORTH LOCAL PLAN EMPLOYMENT AND INDUSTRY REVIEW – POLICY
OPTIONS**

Thank you for your request to provide a representation on the above consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved.

HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents
2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended¹ requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III)². Regulation 10(c)(i) requires that regard also be had to the

¹ Amended by r.33 - Schedule 5 of The Planning (Hazardous Substances) Regulations 2015

² Article 13(1) provides that Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in land use policies or other relevant policies. They shall pursue those objectives through controls on: (a) the siting of new establishments; (b) modifications to establishments covered by Article 11; and (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident

need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes

At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents³. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>

Encroachment of Local Plan Allocations on Consultations Zones

We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones.

H3056 – Calor Gas Ltd, U10, Delta Business Park Smugglers Way, Wandsworth. SW18 1EG

H1733 – Southern Gas Networks, Wandsworth Holder Station, Fairfield Street, Wandsworth. SQ18 1EG

Compatibility of Development with Consultation Zones

The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.

Housing Allocations

Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.

Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units *and* at a density of no more than 40 per hectare.

Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.

Workplace Allocations

Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m² total floor space are compatible with the inner zone.

³ Hazardous substances consents are granted by the Hazardous Substances Authority (HSA), which is usually the planning authority. The consent process is regulated by the HSA under The Planning (Hazardous Substances) Regulations 2015. The HSA must consult HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent, this map defines the consultation distance within which HSE must be consulted over any relevant future planning applications

Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.

Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with the middle zone.

Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m² total floor space are compatible with the outer zone.

This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on *Development Type Tables of HSE's Land Use Planning Methodology*, which is available at: <http://www.hse.gov.uk/landuseplanning/methodology.pdf>

Mixed-Use Allocations

Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to the Web App to determine HSE's advice regarding mixed-use developments.

Verification of Advice using the Web App

The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website: <http://www.hse.gov.uk/landuseplanning/padhi.htm> . When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.

Identifying Consultation Zones in Local Plans

HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.

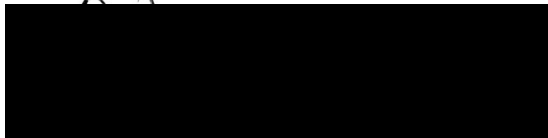
Identifying Compatible Development in Local Plans

The guidance in HSE's Land Use Planning Methodology, available at <http://www.hse.gov.uk/landuseplanning/methodology.pdf> will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on *Development Type Tables* and the *Decision Matrix* are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of the Web App.

If you have any questions about the content of this letter, please contact me at the address given in the letterhead.

Yours faithfully



John Moran

HM Specialist Inspector of Health and Safety (Risk Assessment)



Historic England

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

7 November 2016

By email: planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

**Wandsworth Local Plan: Employment and Industry Partial Review
Policy Options Document October 2016**

Thank you for the opportunity to comment on the policy options document for the Employment and Industry partial review. As the Government's statutory adviser on the historic environment, and a statutory consultee on local plans, Historic England is pleased to engage in the consultation process.

We have reviewed the document in light of the National Planning Policy Framework (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. The place of the historic environment as a key strand of sustainable development (para 7, NPPF) provides for conservation and positive enhancement to be an integrated part of planning future development sustainably.

Historic England does not have a view on the appropriate amount of industrial and employment land in Wandsworth as presented in the recent analysis. We do note, however, that small and medium sized businesses are often attracted to historic buildings and areas of distinctive character, and that this complementary relationship is beneficial to London's economy. Historic buildings and places can nurture start-ups and the creative industries in particular, a priority identified in the NPPF (para 21(4)) and by the new Mayor of London. The retention of local heritage, and re-use of buildings and spaces with individuality contributes to the vitality and energy of London. It is also inherently sustainable, rooting employment in local places.



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk



Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Historic England

Historic England commented at the earlier consultation stage that it will be important to undertake an appropriate level of characterisation of the industrial and employment sites within the borough. By identifying the heritage value within, and adjoining, the sites and this will help inform the nature of change that is suitable. In this way heritage-led regeneration can take place whereby the historic significance of sites is conserved and enhanced (London Plan policy 7.9). The understanding gained can also ensure that new development sits well with the surrounding townscape, in accordance with paras 58-61 of the NPPF.

At present the documents do not provide any information regarding the heritage interest of the sites and areas identified. We encourage you to take this analysis forward prior to the next stage. This will enable you to provide the necessary evidence to answer many of the questions posed, and especially Questions 15 and 30. Having this information early on will assist the smooth progress of the partial review in terms of the tests of soundness.

The comments in the attached schedule provide an indication of the heritage significance for a number of sites – they are not comprehensive. We particularly note that some of the sites identified contain buildings of heritage value that are outside conservation areas and are not identified on the local list. This is a particular concern in two case – The Old Imperial Laundry, 71 Warriner Gardens, Battersea, and 190-194 St Ann’s Hill (Plowden and Smith Ltd), Wandsworth. It would be appropriate to review these and other potential candidates for local designation.

I hope these comments are of assistance to you.

Yours faithfully

[Redacted signature]

Katharine Fletcher
Historic Environment Planning Adviser
E-mail: katharine.fletcher@HistoricEngland.org.uk
Direct Dial: 020 7973 3771



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

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Historic England's specific comments on the Employment and Industrial Sites identified in the Local Plan Review

These comments provide an indication of the heritage interest of the sites – they are not comprehensive. The document does not identify at this stage which buildings may be proposed for redevelopment, rather than change of use, and we encourage further evaluation of heritage interest especially in cases where redevelopment may be considered, including potential archaeological interest.

Queenstown Road Strategic Industrial Location (SIL) Map 8.1

The area shown on Map 8.1 is extensive, and there are a number of designated heritage assets in the surrounding area whose significance and setting would need to be considered in relation to any redevelopment proposals. These include the Parktown Estate and Shaftesbury Park Estate conservation areas, and Queenstown Road station (listed grade II).

Locally Significant Industrial Areas (LSIPs) Map 8.2

The listed 1920s factory building at 265 Merton Road (Southfields LSIA) demonstrates the enhanced townscape value that heritage assets can bring. This should be respected and its setting enhanced in any proposals for redevelopment in the surrounding area. In Wandsworth LSIA, Wandsworth Town Conservation Area, and Wentworth House (listed grade II) are within the boundary and should be retained, positively integrated and enhanced.

Mixed Former Industrial Employment Areas (MFIEAs) Map 8.6

Future proposals for the MFIEAs covering and adjoining Wandsworth Town Conservation Area should take a positive approach to conservation and enhancement of the heritage assets within it, including the Ram Brewery.

Development in the Gwynne Road area should have regard to the setting of the conservation area and listed building to the north of the railway line and to matters of scale, including the setting of listed Cremorne Bridge.

Industrial clusters and undesignated sites, paras 8.38-8.42

The following comments related to the sites in the table in para 8.38:

- Site C20, 71 Warriner Gardens, Old Imperial Laundry: The Victorian laundry buildings are worthy of retention and enhancement. The site would benefit from detailed evaluation to establish the architectural and historic significance of the laundry which currently



makes a strong contribution to the local townscape. It is surprising that this building is not identified in the local list.

- Site C21, 99-109 Lavender Hill Road (Battersea Business Centre): The elevation of the backland Victorian/early C20th warehouse suggests there may be some historic interest.
- Site C23 Smugglers Way, Mark Road, Jews Row: This area contains Wandsworth garage bus depot (listed grade II) and The Ship public house (unlisted). While the latter is not a nationally designated heritage asset it is integral to the character and history of this area, making a positive contribution, and should be retained for its communal as well as heritage value. We note that The Ship is on Wandsworth Council's local list of buildings of special architectural or historic interest. Both of these heritage assets should be retained and integrated sensitively into any redevelopment proposals in the surrounding area.
- Site C24 Jaggard Way: Wandsworth Common Conservation Area adjoins and is partially within this area. Regard should be had to Wandsworth Common station which makes a positive contribution should any redevelopment be considered in the adjoin area.
- Site C28 Railway arches, Winthorpe Road: As noted in para 8.41 residential conversion of railway arches is unlikely to be successful and industrial/business use is both typical for these spaces and appropriate, adding vitality to neighbourhoods through provision of local services.
- Site C29 Irene House, 215 Balham Road, 25 Boundaries Road (Maps 10.3 and 10.21): If redevelopment is considered here special regard should be had to the setting of St Mary's church (listed grade II) adjoin the site.
- Site C31 190-194 St Ann's Hill, Wandsworth: The site lies between Wandsworth Town and Wandsworth Common Conservation Areas. This late Victorian/early C20th building should be retained for its positive contribution to the local townscape. Its heritage significance should be investigated to ensure that it continues in sympathetic use.

Protecting Office Floorspace, paras 8.46-8.53

- Site C20, 71 Warriner Gardens: see previous comments. The building should be retained in sympathetic use.
- Site C22, Cotswold Mews Battersea Square: This lies within the Battersea Square Conservation Area and there are three listed buildings surrounding this enclosed site. Special regard is required for the setting of the adjoining historic buildings and for the character and appearance of the conservation area.





Historic England

- Site C30 Cloisters Building Centre – these are important landmark buildings that make a positive contribution to the Battersea Park conservation area. Retention of the buildings should be a requirement. We note that the Victorian industrial buildings adjoining the railway bridge are derelict and repair and re-use of these buildings is desirable.
- Site C36 116 and 118 Putney Bridge Road – if redevelopment of the site were to be proposed this should take account of the setting of heritage assets, particularly Wandsworth Park, which is a historic park on the national register.
- Site C37 70 Upper Richmond Road – this is a good Victorian villa within the East Putney Conservation Area. The building should be retained and maintained in beneficial use.
- Site C42; Lavender Hill terrace between Sister Avenue and Mysore Road – this is a good Victorian terrace, outside the conservation area that should be retained and maintained in beneficial use.

Historic England's detailed comments on the Employment and Industry Review Policy Options Document (October 2016)



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



General Comment

Question 6 Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area?

In continuing with the Strategic Industrial Location Designation we recommend that an audit of the heritage value of the site and its archaeology is carried out. This should include the heritage interest of the Queenstown Road area itself and also of its surroundings so that the relationship of the area with its locality is fully understood. This will then provide a positive platform for consideration of development proposals in this area.

Characterisation of the heritage within the area should encompass both designated and undesignated assets, and their settings. The railway heritage, for instance, includes the listed Queenstown Road station and also the extensive, undesignated, railway viaducts which are currently proving attractive to many small businesses. The interface with the conservation areas to the south requires particular attention.

04/11//2016

Planning Policy
Housing & Community Services
London Borough of Wandsworth
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir/Madam

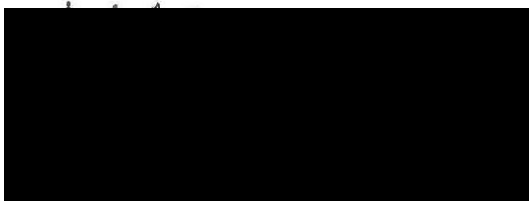
Re: Wandsworth Local Plan: Employment and Industry Review Policy Options Consultation

Boyer are instructed by Ipsus Development Ltd to respond to your recently published consultation on the Local Plan: Employment and Industry Review Policy Options Consultation. We previously provided comments on the Employment and Industry Land Review Preparation Stage Consultation and the Call for Sites earlier in 2016.

Our client has an interest in land and premises at 30-54 Lydden Road (SW18 4LR), which is currently within the Bendon Valley Locally Significant Industrial Area (LSIA).

Please find enclosed our responses to the questions posed. We request these comments and associated appendices are considered as part of the Employment Land Review process and ask to be kept informed of the results of this consultation and any future stages of consultation.

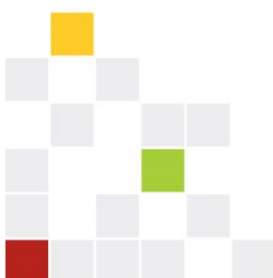
Yours sincerely



Helen Courtney
Senior Planner

Tel: 0203 268 2446

Email: helencourtney@boyerplanning.co.uk



Question 1 – Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

The Wandsworth ELPS identifies three growth scenarios which produce very different estimates of future need, particularly for industrial land. The low growth scenario identifies a contraction in industrial land of -9.5ha whilst the high growth scenario shows growth of 8.2ha; the central scenario shows the middle point between the two (-1.1ha). The low growth scenario is based on the projections for Wandsworth borough and the high growth scenario is based on trends for the wider Industrial Functional Economic Market Area (FEMA) which includes Hammersmith & Fulham, Merton, Lambeth and Southwark boroughs.

All scenarios are based on the employment projections published by the Greater London Authority (GLA). Although other sets of projections, such as Experian and Oxford Economics, have not been taken into consideration we have found from our own experience of conducting similar work that the GLA projections are usually the most accurate source of projections for London.

For industrial, it is clear that that Wandsworth has a significantly different need for industrial land than the wider FEMA and that providing an additional 8.2ha as required by the high scenario is unlikely to be achievable and is out of line with past trends in Wandsworth which have shown continual decline. The GLA's London wide projections and various national projections show the continual decline of industrial sectors and it seems unusual that this particular FEMA would show growth in these areas, particularly given its central London location and service based rather than industrial economy.

The ELPS does not appear to provide a detailed methodology as to how these land/floorspace figures were derived from the GLA projections which are based on the number of jobs; however a growth in industrial jobs would be at odds with the general decline of industrial jobs shown in the GLA projections. As well as the decline of these sectors, industrial employment densities are increasing due to improvements in technology meaning that less floorspace is required. Based on these facts, it is our opinion that for industrial land, the low growth scenario is the most appropriate for Wandsworth.

For office use, the difference between the scenarios is less stark, ranging from +31,700sqm in the low growth scenario to +65,800sqm in the high scenario, with a central figure of +48,400sqm. Once again, the methodology for translating the GLA jobs figures to these floorspace figures is not set out in the ELPS; however this seems to fit with the general growth in office sectors shown in the GLA projections. Given the increasing demand for office premises in the borough and in order to meet the needs of growing sectors, it may be appropriate to consider the central or high growth scenarios for office floorspace.

Question 2 – What impact would the decision to leave the EU have on the preferred growth scenario?

As outlined in the ELPS, there has been short term political and financial uncertainty following the decision to leave the EU however the long term impacts are not yet known. The ELPS suggests that the best approach is to monitor the demand for land and premises against long term strategic aspirations and respond, not to short term effects and consequences of Brexit, but to the long term strategic position and balance of supply and demand.

We agree that it is too early to include any adjustments to the growth scenarios based on Brexit as they would be estimations and would not be based on robust data at this stage. We would agree that the ELPS needs to be regularly monitored would also suggest that the ELPS and the Local Plan need to be updated regularly to respond to the changing economic situation.

It is also important for the Council to be flexible at these times of uncertainty and not restrict economic growth by protecting poorly performing employment locations, which may be able to more actively contribute to the economy in other ways. We suggest that any future employment policies are designed to be more flexible to respond to these changing economic conditions and to allow Wandsworth to move with and adapt to any implications from Brexit.

Question 3 – Do the findings of the ELPS and other recent evidence in any way undermine the strategic objectives set out in section 6 above?

The continued designation of the Bendon Valley Locally Significant Industrial Area (LSIA) for purely industrial use, particularly once the former Bingo Hall site has been re-designated for mixed use, undermines the Council's strategic objectives to 'maximise the employment potential of land and promoting development for employment purposes including as part of mixed use development so as to increase job and business opportunities'.

As discussed in greater detail in other parts of this submission, once the former Bingo Hall site has been removed, the remaining LSIA becomes an irregular shaped and very small industrial area. This, in addition to the existing mix of non-industrial uses present in the area including residential, a pub, retail and office use and the issue of the surrounding residential on three sides, does not result in an appropriate industrial location.

Our client's site (30– 54 Lydden Road) contains 2 separate industrial buildings divided into 6 units which are aging and in poor condition. Combined, all of the buildings currently employ around 33 people, which represents an extremely low density considering the size of the site¹. Any redevelopment of this site for industrial use is unlikely to be viable and the existing owners have indicated that they are looking to close their businesses within the next few years. The

¹ Further details on the site (including a map) can be found in our response to question 8

redevelopment of this site for industrial use is likely to be difficult to achieve due to the surrounding residential uses and the refurbishment of the existing building will be very costly and is unlikely to increase the density of jobs on this site. In reality the buildings, even in a refurbished condition, are not going to be fit for purpose; failing to meet the requirements of modern occupiers and wholesale redevelopment is required which is totally unviable.

In summary, the continued protection of this site for industrial use is likely to mean that it remains as it currently stands; the condition will deteriorate further and the number of jobs could decrease even further.

Retaining this area for industrial use also fails to fulfil the strategic objective to provide flexible business space to meet the needs of the small and medium enterprises (SMEs) which comprise the overwhelming number of businesses in the borough. The re-designation of this site for a mix of uses including residential would allow the site to provide some small flexible employment space for SMEs, which would be unlikely to be otherwise viable. There is already considerable SME workspace available in Bendon Valley at the Riverside and Earlsfield Business Centres and it seems likely that further development of this kind will occur on the former Bingo Hall site given it is now in the same ownership as the Riverside Business Centre. Therefore there is an opportunity to create a SME workspace hub in this area.

Question 4 – Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the exiting designations at Queenstown Road and along the Wandle Valley?

The Council needs to consider carefully the most appropriate locations to protect industrial land. Whilst the ELPS provides a high level summary of sites in the borough, it does not provide detailed analysis of some of the smaller sites, particularly the smaller industrial locations.

As discussed in our response to question 3, once the former Bingo Hall is redeveloped for a mix of uses, the remaining part of the Bendon Valley LSIA will become very small and irregular shaped. It is located in a predominately residential area and already contains a mix of uses within its boundary including residential, a pub, retail and office use. Any redevelopment for further industrial use is likely to be highly restricted by the surrounding residential uses and poor strategic road access. There is also a newly refurbished primary school located directly opposite the junction with Lydden Road on Garratt Lane which is not compatible with heavy goods vehicles.

The Strategic Industrial Location (SIL) at Queenstown Road is a large industrial area, located close to central London and with greater potential for more intense industrial use. The site is located immediately adjacent to the Central Activities Zone (CAZ) at Nine Elms and therefore is likely to be an appropriate location for businesses which support the service based sectors

expected to occupy the Nine Elms area once completed. As this area is large and mainly surrounded by railway lines, it is unlikely to have as many issues relating to restrictions from surrounding residential uses.

It is therefore considered that this is the most important industrial site in the borough with the most potential for growth and intensification and should be protected for industrial uses.

Question 5 – no response

Question 6 – Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area?

Yes, see response to Question 4.

Question 7 – Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

It is agreed that the former bingo hall in Bendon Valley should be prioritised for re-designation however consideration needs to be given to the impact of this on the rest of the LSIA. The Bendon Valley LSIA already contained a mix of uses including residential offices, leisure, pub and retail and the mixed use re-designation of the former bingo hall will undermine its industrial character even further. Any employment uses on the former bingo site would need to be compatible with the residential uses on and surrounding the site and therefore are likely to be office type uses or very light industrial space such as studios/workshops for SMEs. These types of uses are already present at the Riverside Business Centre and Earlsfield Business Centre (9 Lydden Road). There is also permitted office use along Lydden Grove which forms the north western 'finger' of the LSIA and office buildings which have permitted development to residential granted next to the Jolly Gardners pub on Garratt Lane.

The map and photographs below shows the mix of uses within the LSIA and the context of the surrounding residential and primary school. Further photographs can be found in Appendix B.

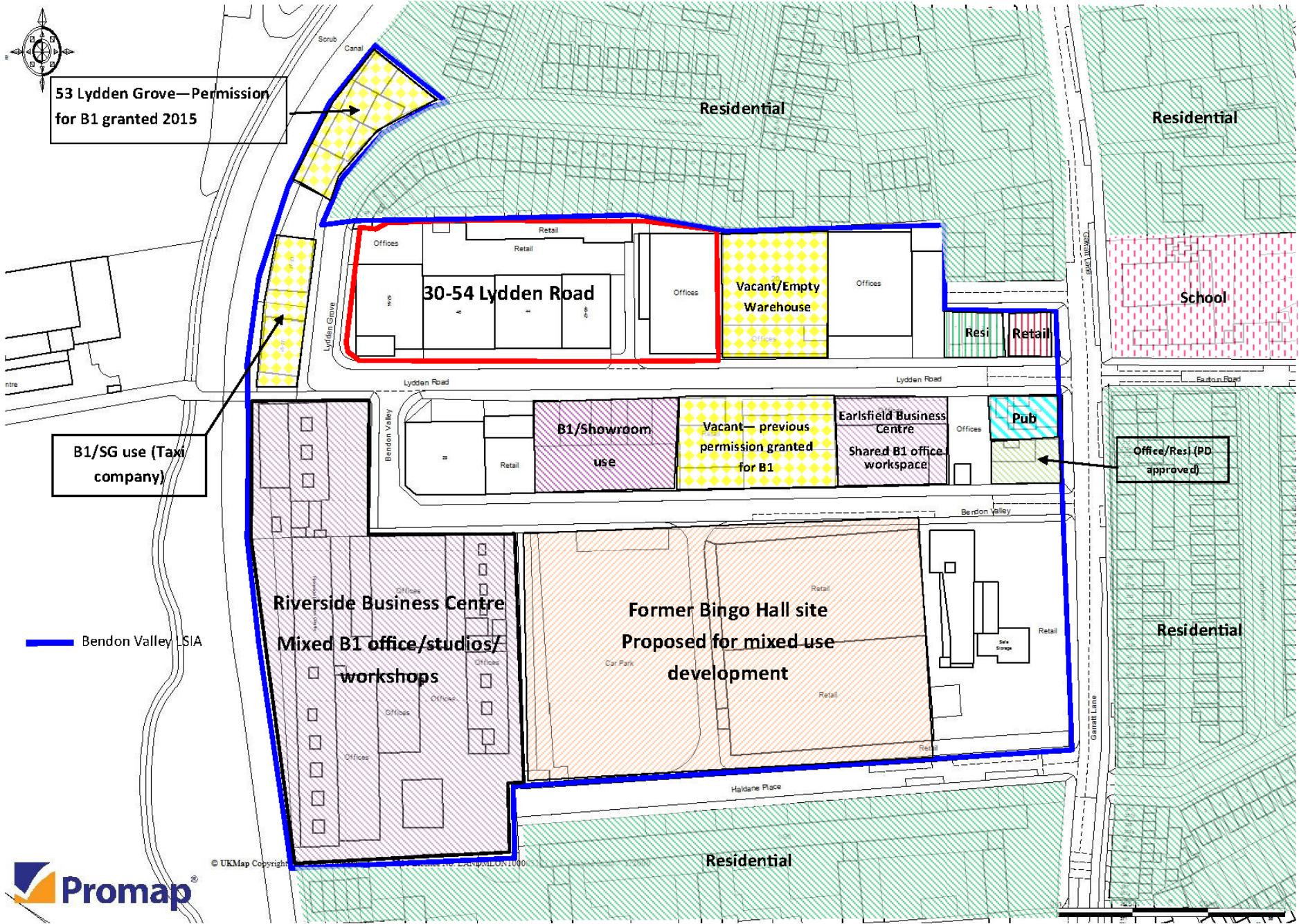


Figure 1 – Map of uses in and around Bendon Valley LSIA



B1 Office units for SMEs at Earlsfield Business Centre



The Jolly Gardner's Pub within the LSIA boundary



B1 office/studio units for SMEs at Riverside Business Centre



Residential dwellings currently within the boundary of the LSIA



Permitted office use within the LSIA boundary



Residential properties immediately adjacent to 38-54 Lydden Road



Former bingo hall – now being used as a trampoline centre



New Floreat Wandsworth Primary School opposite Lydden Road junction

In summary, the industrial character of this LSIA has already been eroded and further mixed use development on this site is likely to erode it further. The mixed use nature of the site, the access and parking issues, the relatively poor access to the strategic road network and surrounding residential uses is likely to restrict further industrial development in this LSIA.

Question 8 – Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?

As outlined in our response to Question 7, we consider that the remainder of the Bendon Valley LSIA should be re-designated for the same mixed use designation as the former Bingo Hall site in order to facilitate redevelopment. The area already contains a range of shared office/studio space at the Riverside and Earlsfield Business Centres and it seems likely that the same type of space will be provided on the former bingo hall site given that it is now in the same ownership as the Riverside Business Centre (Workspace). Therefore, there is an ideal opportunity to create a hub for SMEs in the Bendon Valley area, which will contribute significantly more to the Wandsworth economy than the existing industrial use.

The new London Mayor has recently published an early consultation document on the next London Plan Review² which recognises some of the issues relevant to this location. Whilst the Mayor recognises the need to promote economic growth, he states that he is aware that the economy is changing and that there is a need to use land intelligently – particularly in the context of a housing crisis. He states that:

“In some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. And it may be feasible for housing and industrial activity to co-exist in certain locations. We need to be creative in how we think about space and promote mixed-use activity.” (A City for Londoners p22 [Boyer emphasis]).

The Site (30-54 Lydden Road)

We now make particular reference to our client's site 30-54 Lydden Road (as shown on the map below) and its potential for redevelopment. An independent assessment by Commercial Surveyors Houston Lawrence has also been prepared which can be found in full in Appendix A.

² A City for all Londoners October 2016
https://www.london.gov.uk/sites/default/files/cfal_oct_2016_fa_rev1.pdf



Residential properties adjacent



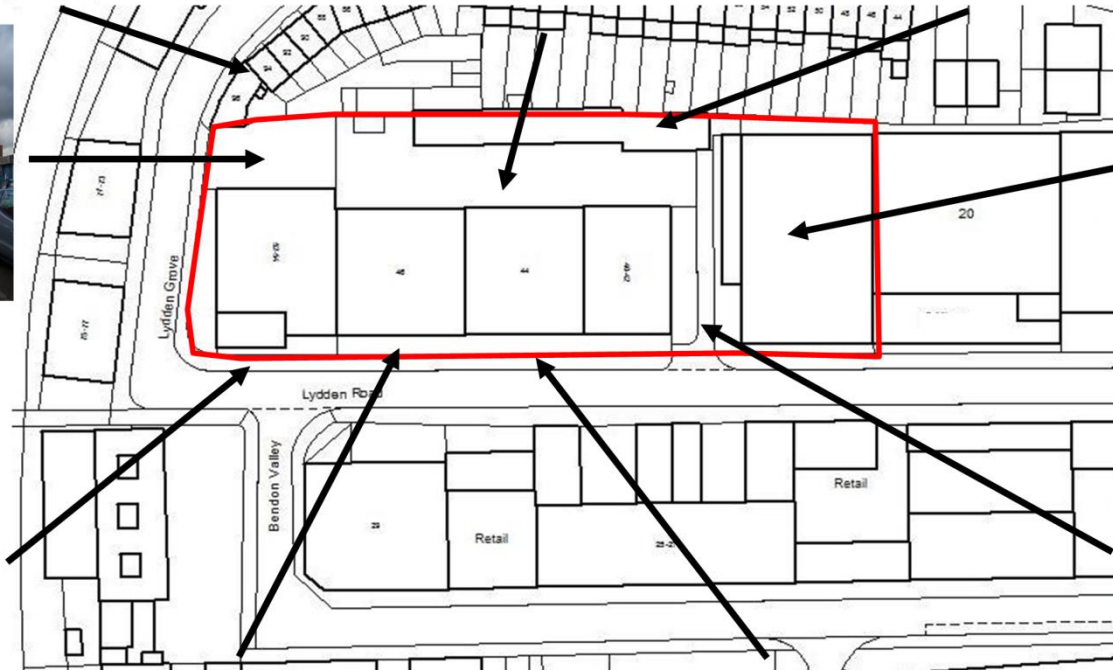
View of buildings from rear



Garage block at rear



View of rear yard and residential properties adjacent



Front of 30 Lydden Road



Front of 38-54 Lydden Road



Side of 40-42 Lydden Road



Front of 38-54 Lydden Road



Front of 38-54 Lydden Road

Figure 2 – Map and photographs of 30-54 Lydden Road

The site is approximately 0.51 ha in size and contains 2 buildings accommodating 6 different businesses, totaling 3,357sqm with approximately 1,743sqm of yard/circulation space. A summary table of the units is set out below:

Address	Occupier	Type of Business	Type of premises	Floorspace (sqm)	Use Class	Estimated Employees
30 Lydden Road	Marldon	Storage, laundry and joiner / workshop to support wider business running hotels/serviced apartments	Warehouse	1,240	B8	8
38-42 Lydden Road	D & M Coachworks	Maintenance And Repair Of Motor Vehicles	Vehicle Repair Workshop and Premises	649	SG	4
44 Lydden Road	B A F Graphics Ltd (main unit over the road)	Printers	Workshop and Premises	212	B8	0*
46-50	Juno Glass Ltd	Glaziers	Workshop and Premises	646	B1c	9
52 Lydden Road	London Spray Finishes Ltd and Osbond & Tutt	Spray finishes and French polishing	Workshop and Premises	248	B1c	5
54 Lydden Road	Lethbridge Lines	Joinery and Carpentry	Workshop and Premises	362	B1c	7
Total				3,357		33

The buildings combined currently employ around 33 people, which results in a density of 102sqm per employee. This is extremely low compared to average industrial densities. The Homes and Communities Agency (HCA) Employment Density Guide 2015 state that the average density for B1c (light industrial) was around 36sqm per employee and the density for B2 (general industrial) was 47sqm per employee. Typical densities for B8 uses (storage and distribution) range between 70sqm and 95sqm, with 95sqm large representing national distribution centres which typically have very few staff. As shown by these figures, the buildings at 30-54 Lydden Road are extremely low density compared to typical industrial uses and are not being utilised effectively to their full potential.

The condition of the buildings is poor and the commercial assessment by Houston Lawrence states that they are in desperate need of comprehensive refurbishment or more likely comprehensive redevelopment. The refurbishment costs have been estimated at between £100,000 and £110,000 per unit as each unit requires to be re-roofed, completely refurbished internally to include new electrics, heating, toilets, compliance with DDA and compliance with the new energy act with at present these buildings do not. This does not take into account any communal areas such as the car park/external areas which are also in poor condition. Even if these works were undertaken, this would not solve the issues relating to the low internal height of 3.1m or under

which cause access difficulties. Further details on the building condition and heights can be found in Appendix A.

Most of the units are owned by the occupying businesses and it is our understanding that the owners have expressed the desire to retire/close the businesses within the next few years. They have stated that the refurbishment works required to re-let the units is not viable as it is unlikely to lead to significantly increased rental returns.

A few example photographs showing the condition of the building are shown below and further photographs can be found in Houston Lawrence's report in Appendix A.





In summary, whilst this site is currently still occupied the buildings are going to need significant works to extend their life-span beyond a few years and to attract new occupiers. Further details of the refurbishment costs can be found in the attached Houston Lawrence report; however the report concludes that viability of a refurbishment has serious commercial failings.

Even if these works are undertaken, they are unlikely to significantly increase the employment density of the site and therefore the overall contribution to the economy.

Proposed Mixed-Use Redevelopment

At this early stage, full development plans for the site have not been drawn up however initial estimates are indicating that the site could accommodate 100-130 dwellings and replacement of the employment floorspace, albeit for a B1 type use. It is anticipated that the site could provide the same amount of floorspace as existing (around 3,300sqm) as shared workspace/studios for SMEs.

The redevelopment of this site for both residential and employment floorspace is likely to have a range of substantial socio-economic benefits. We have undertaken an initial socio-economic benefits analysis for the redevelopment of the site as set out above, which is summarised as follows:

- Increase housing supply by approximately 100-130 dwellings including affordable dwellings
- Replacement of 3,300sqm employment floorspace
- Approx 90 –290 new direct jobs³ plus associated indirect/induced jobs. Even at the lower end of this estimate, this represents a significant increase on the 33 jobs currently on the site.
- Increased jobs and GVA⁴ from the demolition and construction phase of development⁵
- New Homes Bonus revenue of approximately £1 million over 6 years

³ Number of jobs dependent on use and floorspace type

⁴ Gross value added (GVA) is the measure of the value of goods and services produced in an area, industry or sector of an economy

⁵ Figures not yet able to be calculated due to unknown costs of development

- Increased Council Tax revenue of approximately £900k per annum
- Retention of current business rates revenue of approximately £100k per annum from replacement of employment floorspace⁶
- Revenue generated from CIL payment
- Approximately 250 new residents in the area to support local services and amenities
- Increased resident spend of around £2million per annum in the local area⁷
- Increased worker spend of approximately £105k – 340k per annum in the local area⁸

It is clear that the redevelopment of the site will bring a range of benefits to the local area and also to the wider Wandsworth economy. It is unlikely that redevelopment would be viable without the inclusion of residential; this is due to the lower value of industrial uses and also the contamination issues which add significant costs to any redevelopment opportunity.

If the wider LSIA as a whole is redesignated the wider benefits would be much greater as the above would be potentially applicable across all of the sites.

Question 9 – Are there any other sites or areas within other LSIA's that should be prioritised?

See response to Question 10 below.

Question 10 – Should the Council continue to protect the other LSIA's in their entirety for industrial type uses?

Whilst our comments are focused on Bendon Valley, a brief analysis of the other nearby LSIA's shows that the majority are performing better as industrial locations.

The ELPS discusses the Bendon Valley, Kimber Road and Old Sargent Road LSIA's together and states that all three clusters have a similar character and types of occupiers. We would disagree with this and argue that both the Kimber Road and Old Sargent LSIA's both attract higher value occupiers and have retained more of their industrial character.

Kimber Road LSIA – Kimber Road is a larger LSIA with larger industrial buildings. It appears to be well occupied and contains fewer non-industrial uses than Bendon Valley. It is not as tightly surrounded by residential use as Bendon Valley so there are likely to be less neighbour issues relating to the compatibility of uses. It has retained more of an industrial character and has many large national occupiers with greater covenant strength such as Halfords, Screwfix Speedy Hire and Crown amongst others.

⁶ Subject to any small business relief that might be applicable

⁷ Based on average household spend on food and drink, household goods, leisure, clothing etc

⁸ Based on average spend per worker per day in the local area



Figure 3 - Units at Kimber Road

Old Sargent Road LSIA – Although of a similar size to Bendon Valley, this area also has larger buildings and attracts more national occupiers with greater covenant strength such as Topps Tiles, Plumbase and Howdens. Many of the buildings appear to be in a much better condition than Bendon Valley and the site is well occupied.



Figure 4 - Units at Old Sargent Road

It is our view that these two areas are very different from Bendon Valley both in their characters and the type of occupiers they are attracting. The road network and access is generally better and they have more modern units with larger eave heights and yard areas to facilitate loading and deliveries, meaning they are better suited for industrial use.

Bendon Valley attracts smaller and more local businesses, particularly SMEs at the Riverside and Earlsfield Business Centres however these uses are generally less industrial than those at the Kimber Road and Old Sargent Road LSIA's. Whilst we have not assessed these areas in as much detail as Bendon Valley, it seems apparent that they work better as traditional industrial areas and should be protected.

Question 11 – no response

Question 12 – no response

Question 13 – no response

Question 14 – no response

Question 15 – no response

Question 16 – Are there reasonable justifications for exceeding the low growth demand forecast, either for individual sites or cumulatively? Should any of the sites recommended for re-designation in the Employment Land and Premises Study be retained for industrial and distribution use?

As set out in our response to Question 1, for industrial land we believe that the low growth scenario is the most appropriate. The low growth scenario is reflective of trends in Wandsworth and also reflects the general decline of industry in London and nationally. The high growth scenario is based on wider FEMA trends which shows industrial growth however this seems to be out of line with trends for Wandsworth, London and nationally and it is not clear how it has been calculated from the GLA figures.

The difference between the scenarios for office space is less dramatic and therefore it is more difficult to accurately predict the exact figure of future need. It may depend on the aspirations of the council for economic development in the borough. As the sectors requiring office floorspace are growing (unlike those which require industrial floorspace) it may be advisable to have a flexible policy which is regularly monitored and where floorspace figures can be increased if there is particular market demand.

Question 17 - Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

The ELPS states that the amount of industrial land to be lost at Nine Elms and the existing MUFIEAs far exceeds the loss of even the low growth scenario, which seems to be the rationale for retaining the remaining industrial land. Whilst this seems logical on a borough wide basis, this approach fails to consider some of the smaller industrial locations which are not performing well and may have limited lifespans, such as Lydden Road. The redesignation of our client's site (and possibly the wider LSIA) to mixed use would allow for an increase in jobs along with a range of other socio-economic benefits as outlined in our response to Question 8.

The new Mayor of London has already expressed the need to explore the co-location of housing and industrial uses in light of the huge need for housing in his 'A City for all Londoners' document published in October 2016. He also expresses the need to be creative in how we think about space and promote mixed-use activity. Whilst this is unlikely to work for larger heavy industry and storage and distribution uses, this could work for the type of light industrial uses and shared workspaces already prevalent in Bendon Valley. Although the Mayor's 'A City for all Londoners' document is a very early stage of the London Plan Review process, it does highlight the potential direction of travel for the next London Plan and therefore should be given consideration.

Question 18 – no response

Question 19 – no response

Question 20 – no response

Question 21 – no response

Question 22 – no response

Question 23 – no response

Question 24 – no response

Question 25 – no response

Question 26 – Should the Wandsworth gas holder site and the former bingo hall site in Bendon Valley be re-designated as Employment Intensification Areas, seeking increased quantities of employment floorspace alongside other uses?

From discussion with officers, it is our understanding that the Bingo Hall at Bendon Valley would be prioritised for a mix of uses including employment and residential. We support this approach and consider that the same approach should be allowed for the wider Bendon Valley LSIA. This would allow for a more holistic redevelopment of the area.

However, the intensification of the area should not necessarily be considered in terms of increased floorspace as many emerging sectors and types of workspace are often much more dense and therefore provide many more jobs in a smaller area. A site-by site approach which considers the existing use of the site and the number existing jobs and contribution to the economy should be used.

Question 27 – Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?

See response to Question 26. We believe that this approach should include the wider Bendon Valley LSIA.

Question 28 – no response

Question 29 – no response

Question 30 – no response

Question 31 – no response

Question 32 – no response

Question 33 – no response

Question 34 – Should a similar area spatial strategy and/or site allocation be set out for the former bingo hall site in Bendon Valley? If so, are there issues specific to this site that these should address?

Yes, it is agreed that a similar area spatial strategy/ site allocation is required for the former Bingo Hall site however this should include the whole of the Bendon Valley LSIA to allow for a holistic approach to the redevelopment and improvement of the area. The redevelopment of the bingo hall site is likely to have a significant impact on the rest of the Bendon Valley LSIA and its industrial character, which has already been eroded by other uses. As detailed throughout these comments, we believe that there are

other opportunities within the rest of the Bendon Valley LSIA to provide a mix of uses including employment for SMEs for emerging sectors in the form of shared/managed workspace and studios.

If the Bingo Hall redevelopment happens in isolation it is likely to have a detrimental impact on the balance of the Bendon Valley LSIA and might result in occupiers being forced to leave as their uses/activities are no longer compatible with the new neighbouring uses so the nature of the LSIA would change anyway and may be less attractive for new occupiers/tenants to come of the area if they are not able to undertake their more industrial type activities.

This area needs to be approached holistically to prevent piece meal development and to ensure that the uses compliment rather than compete with each other. There are also issues relating to access, manoeuvring and parking⁹ in the Bendon Valley LSIA which will need to be considered on an area-wide basis to be solved.

Question 35 – no response

Question 36 – no response

Question 37 – no response

Question 38 – no response

Question 39 – no response

Question 40 – no response

Question 41 – no response

Question 42 – no response

Question 43 – no response

Question 44 – no response

Question 45 – no response

Question 46 – no response

Question 47 – no response

Question 48 – no response

Question 49 – no response

Question 50 – no response

Question 51 – no response

Question 52 – no response

Question 53 – no response

Question 54 – Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within Locally Significant Industrial Areas?

The policy to require full replacement of existing floorspace can be problematic as it does not consider that

⁹ As recognised in the ELPS page 40

different uses operate at different densities and that employment densities are generally decreasing due to improvements in technology, cost savings and the increase in flexible working practices.

Also, the requirement to replace floorspace is not necessarily an appropriate reflection of employment need in an area and of the economic contribution of a particular building/use. A more flexible policy approach is required which allows for the consideration of replacing the number of jobs and the wider economic impact of the replacement floorspace on a site by site basis.

Question 55 – Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in Locally Significant Industrial Areas?

For those LSIAs in need of investment and redevelopment, such as Bendon Valley, the Council should allow for a mix of uses including residential. The inclusion of residential will improve viability and facilitate development. The employment provision on the site would need to be suitable for the residential setting and therefore is likely to be B1 use such as shared workspace/studios etc.

As discussed, the new London Mayor has recently published an early consultation document on the next London Plan Review¹⁰ which suggests that some industrial land could be better for housing and that it may be possible for industrial and housing to co-exist in certain locations. He states that we need to be creative in how we think about space and promote mixed-use activity, particularly in the context of a housing crisis.

Question 56 – no response

Question 57 – no response

Question 58 – no response

Question 59 – no response

Question 60 – no response

Question 61 – no response

Question 62 – no response

Question 63 – no response

Question 64 – no response

Question 65 – no response

Question 66 – Do the policy options set out in the sections above accurately reflect the evidence base?

The policy options above do reflect the findings of the evidence base however the ELPS is a high level document which considers need at a borough/FEMA wide basis. It therefore fails to fully consider the issues at some of the smaller industrial areas such as Bendon Valley and in particular our client's site.

The Council now needs to examine some of the smaller areas that it seeks to retain for industrial use such as Bendon Valley to decide whether it is realistic to expect further industrial development to occur here given the surrounding residential and office use, parking issues and transport links. It is unlikely that our client's site will

¹⁰ A City for all Londoners October 2016 https://www.london.gov.uk/sites/default/files/cfal_oct_2016_fa_rev1.pdf

be redeveloped for purely industrial use and therefore this site is likely to remain as low value industrial use for the short term and the condition will worsen and may become vacant and derelict in the longer term.

Question 67 – no response

Question 68 – no response

APPENDIX A - HOUSTON LAWRENCE REPORT

**Commercial Market Report for
30-54 Lydden Road, Bendon Valley, Wandsworth SW18**

Produced by

HOUSTON LAWRENCE

8 Spice Court, Plantation Wharf, London SW11 3UE

October 2016



APPENDICES

Appendix I – Photographs showing poor vehicular access and parking issues

Appendix II – Photographs of existing building 38- 54 Lydden Road

Appendix III – Schedule of availability of comparable units in the Borough

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Houston Lawrence is a well-established practice of commercial surveyors. Founded in 1985 and operating from a south London office since 1991, the company specialise in the letting and sale of commercial property acting on behalf of a variety of landlords, tenants, property companies and funds. The practice covers all aspects of the commercial property market, including retail, office and industrial, a large number of our instructions can be seen on our website www.houstonlawrence.co.uk. The two partners of Houston Lawrence have over sixty years' experience in dealing in commercial property in south London and see themselves as specialist south London agents.

INSTRUCTION

For over 20 years we have been involved in the letting and sale of commercial premises throughout Wandsworth, Battersea and Vauxhall and have built up a deep knowledge of the area and therefore feel qualified to comment in relation to the changes in the market place that we have seen and continue to see.

1. SITE HISTORY

- 1.1 Lydden Road has a mixture of types of premises, ranging from single storey industrial units to multi storey industrial/ office buildings, residential, and showroom uses.
- 1.2 On the face of it, it appears that Lydden Road is still predominantly an industrial location, but this is and has been changing for some time. 9 Lydden Road is the Need Space Business Centre with numerous office / studio units to rent on a short term basis with space from as little as one work station up to 8- 10 workstations. This building is we understand, virtually fully let and is predominantly occupied by SME companies (Small and medium sized enterprises) who are essentially office /studio occupiers.

- 1.3 The SME market is clearly a major factor within the London Borough of Wandsworth, as over 90% of the companies fall within this category. It is well documented throughout all of Wandsworth recent employment land studies that the industrial warehousing market has given way to more office / studio style small unit schemes that are satisfying the pent up demand for SME companies.
- 1.4 In addition, 17 Lydden Road did have a planning permission for a change of use from warehouse and ancillary offices to predominantly offices with some ground floor warehouse. The consent was for 539 sq m of warehousing and 2278 sq m of upper floor offices. Whilst this consent has expired, it does show a changing trend away from warehousing and industrial to more office/ studio users.
- 1.5 Mr Resistor is again a relatively newly developed building which does have warehousing, but also has a high content of showroom and office, and the building was essentially built as a bespoke building for them.
- 1.6 53 Lydden Road was originally an office with ancillary warehousing but again the owners have recently obtained a planning consent for 4 office units on the scheme, and at 75-79 Lydden Grove the Keen Group a local courier company occupy their building fully as offices.
- 1.7 In addition, the well-known clothing company Crew Clothing have their headquarters in Lydden Road which again is a high office content building with ancillary warehousing which we understand is currently underutilised.
- 1.8 Therefore it can be seen that there is already a general trend away from the historic industrial/ warehousing units within Lydden Road and a move towards more office/ studio units. Indeed, we understand that the Workspace Acquisition of the former bingo hall, which is now let to the trampoline company, has been singled out as a site for alternative commercial uses along with other

uses. It is clear in our opinion, that the proposal that will come forward will be for a redevelopment of the site and their existing holding of Haldane Place to become a major mixed use development similar to that which they undertook at Broomhill Road where they redeveloped older style office and industrial buildings to a vibrant mixed use scheme alongside Mount Anvill residential developers.

- 1.9 This is a natural progression for Lydden Road, as from an industrial and warehousing perspective it is becoming extremely difficult to service the industrial units along Lydden Road as cars are parked on both sides of the road, leading to frequent blockages. Indeed, it is virtually impossible for any large scale lorry now to drive through the Lydden Road area. This can be witnessed in the photographs attached in Appendix I and this is a major drawback for any occupier of Lydden Road as servicing and loading is simply impractical. This is one of the major reasons that most industrial areas, where there is not dedicated service yards and better road access; are now moving away from these areas to locations outside the M25.
- 1.10 There are numerous examples within the Borough where industrial estates do continue to thrive and the common thread through all of these is good access, good loading, good eaves height and indeed in these locations the rental levels being achieved far outweigh that that would be achieved in Lydden Road.
- 1.11 The Sergeant Industrial Estate on Garratt Lane is a classic example, whereby well located good eaves height (6-7 metres) units continue to let and trade successfully. Houston Lawrence have been involved in numerous lettings over the years and indeed I don't believe there has been a vacancy on the estate in the last 7 – 8 years with tenants simply renewing their leases at rents of between £16 and £15 per sq ft pax.

- 1.12 Jaggard Way off Wandsworth Common, again is a successful industrial estate with little or no vacancies due to good loading and access.
- 1.13 London Stone Estate off Queenstown Road, this is owned by Network Rail and has always been an extremely busy and thriving estate. The landlords have recently built a new industrial warehouse unit, and rents being quoted are £25.00 per sq ft.
- 1.14 Glenville Views, Kimber Road, Wandsworth SW18 has always proved to be of interest to local occupiers due to the quality of the units, location and access.

2. COMPARABLE LOCAL SCHEMES

- 2.1 Clearly, Nine Elms is the most obvious case of comprehensive redevelopment from Industrial / warehousing to mixed use schemes, but there are others. For example:

Broomhill Road Wandsworth SW18

A former industrial warehousing and office centre owned by Workspace Group Plc which was redeveloped into offices and retail.

Wandsworth Riverside Quarter Osiers Road SW18

Has been comprehensively transformed from an Industrial/ warehouse location to again a vibrant mixed use scheme with retail/ residential and offices.

Chatfield Road, Battersea SW11

Was a former car repair workshop and has been redeveloped to provide retail, office and residential units above.

Gwynne Road, Battersea SW11

A former industrial premises that has been turned into ground floor office units with residential above.

2.2 There are other numerous examples throughout the Borough that show that old aging industrial units with poor access can be transformed into vibrant mixed use schemes.

3. EXISTING BUILDINGS / VIABILITY FOR CONTINUED COMMERCIAL USE

3.1 With regards to the particular units in Lydden Road upon which you are advising the owner, namely 30 – 54 Lydden Road. These units are typical of the older style unit that is reaching the end of its useful life and indeed suffers from extremely poor access, loading and parking. In Appendix II we have attached a series of photographs showing the condition of these units, and it is our understanding that the vast majority of the occupiers are all facing difficult times and essentially only continue due to the fact that they own their freehold and are therefore not paying rent.

3.2 A number of the units as can be seen are in poor condition and are in desperate need of comprehensive refurbishment or more likely comprehensive redevelopment

3.4 The refurbishment costs have been estimated at between £100,000 - £110,000 per unit as each unit requires to be re-roofed, completely refurbished internally to include new electrics, heating, toilets, compliance with DDA and compliance with the new energy act which at present these buildings do not.

3.5 Indeed, we have inspected the EPC (Energy Performance Certificate Register) and can only find one of the subject premises to have registered an EPC which is in the bracket F which would not be sufficient for letting in today's market.

-
- 3.6 The units themselves have extremely low eaves heights of 3 m and under and as such limits the type of company that could theoretically occupy these premises as industrial warehousing users normally prefer to see heights of between 6 and 7 m as commented. Add this height restriction to the previous restrictions and you can see why the viability of a refurbishment has serious commercial failings.
- 3.7 We understand that units 52 and 54 have recently been re-let at rents of the between £8.50 and £10.50 per sq ft. However, these rents are clearly lower than one would like to see and this reflects the condition, location and type of unit that we are dealing with.

Indeed, Houston Lawrence have been involved on a rent review on good quality industrial warehousing units in Havelock Terrace last year where we achieved £16.50 psf pax.

- 3.8 At these levels of rent, it is clear that these buildings are not only reaching the end of their useful lives but it is also unviable going forward as an industrial/ warehouse premises. The continued deterioration of the premises is only likely to lead to the potential for even lower rents to be achieved. Or indeed, there will come a point where the units do become essentially unlettable.

4. CONCLUSION

4.1 In conclusion, we firmly believe that the units in Lydden Road have reached the end of their useful life in the current planning use and alternative commercial uses and other uses should now be considered. The wider Bendon Valley area of which this forms a part, has already substantially changed terms of types of users as outlined in the early part of this report. In our opinion, extending the planning designation given to the former Bingo Hall to include this site and the wider Bendon Valley area would encourage and facilitate redevelopment.

4.2 In Appendix III we have attached details of available units in the Borough which are clearly more suited to industrial warehousing tenants due to their quality location, access and servicing.

Appendix I – Photographs showing poor vehicular access and parking issues







Appendix II – Photographs of existing building 38- 54 Lydden Road









Appendix III – Schedule of availability of comparable units in the Borough

Lease Availability Report

Units K-L, London Stone Business Estate - Broughton St London, SW8 3QR - Wandsworth Ind Submarket



BUILDING

Type:	Industrial
Subtype:	Warehouse
Tenancy:	Multiple
Year Built:	1957; Renov 2016
GLA:	3,573 SF
Floors:	2
Typical Floor:	1,259 SF

AVAILABILITY

Min Divisible:	658 SF
Max Contig:	3,573 SF
Total Available:	3,573 SF
Asking Rent:	£25.00/SF

SPACES

Floor	Use	Type	SF Avail	Bldg Contig	Rent	Rates	Ser Charge	Term
P GRND	Industrial	New	1,259	3,573	£25.00/SF			Negotiable
P GRND	Industrial	New	1,656	3,573	£25.00/SF			Negotiable
E 1st	Industrial	New	658	3,573	£25.00/SF			Negotiable

LOADING

Docks:	None	Drive Ins:	2 tot./12'w x 20'h
Cross Docks:	None	Cranes:	None
Rail Spots:	None		

FEATURES

Roller Shutters

TRANSPORTATION

Parking:	10 free Surface Spaces are available; Ratio of 2.08/1,000 SF
Commuter Rail:	2 minute drive to Queenstown Road Commuter Rail
Airport:	36 minute drive to London City Airport

Lease Availability Report

Units I-J, London Stone Business Estate - Broughton St London, SW8 3QR - Wandsworth Ind Submarket



BUILDING

Type:	Industrial
Subtype:	Warehouse
Tenancy:	Multiple
Year Built:	1995; Renov 2016
GLA:	5,312 SF
Floors:	1
Typical Floor:	5,312 SF

AVAILABILITY

Min Divisible:	1,991 SF
Max Contig:	3,982 SF
Total Available:	3,982 SF
Asking Rent:	£25.00/SF

SPACES

Floor	Use	Type	SF Avail	Bldg Contig	Rent	Rates	Ser Charge	Term
E GRND	Industrial	New	1,991 - 3,982	3,982	£25.00/SF			Negotiable

LOADING

Docks:	None	Drive Ins:	2 tot./12'w x 20'h
Cross Docks:	None	Cranes:	None
Rail Spots:	None		

TRANSPORTATION

Parking:	10 free Surface Spaces are available; Ratio of 1.88/1,000 SF
Commuter Rail:	2 minute drive to Queenstown Road Commuter Rail
Airport:	36 minute drive to London City Airport

Lease Availability Report

Units M-N, London Stone Business Estate - Broughton St London, SW8 3QR - Wandsworth Ind Submarket



BUILDING

Type:	Industrial
Subtype:	Warehouse
Tenancy:	Single
Year Built:	1995; Renov 2016
GLA:	2,658 SF
Floors:	1
Typical Floor:	2,658 SF

AVAILABILITY

Min Divisible:	1,259 SF
Max Contig:	2,658 SF
Total Available:	2,658 SF
Asking Rent:	£25.00/SF

SPACES

Floor	Use	Type	SF Avail	Bldg Contig	Rent	Rates	Ser Charge	Term
P GRND	Industrial	New	1,399	2,658	£25.00/SF			Negotiable
P GRND	Industrial	New	1,259	2,658	£25.00/SF			Negotiable

LOADING

Docks:	None	Drive Ins:	2 tot./12'w x 20'h
Cross Docks:	None	Cranes:	None
Rail Spots:	None		

FEATURES

Mezzanine, Roller Shutters

TRANSPORTATION

Parking:	10 free Surface Spaces are available; Ratio of 2.02/1,000 SF
Commuter Rail:	2 minute drive to Queenstown Road Commuter Rail
Airport:	36 minute drive to London City Airport

Lease Availability Report

Units 9-14, Glenville Mews Ind. Estate - Glenville Mews London, SW18 4NJ - Wandsworth Ind Submarket



BUILDING

Type:	Light Industrial
Subtype:	Light Manufacturing
Tenancy:	Multiple
Year Built:	1980
GIA:	8,864 SF
Floors:	1
Typical Floor:	8,864 SF

AVAILABILITY

Min Divisible:	1,469 SF
Max Contig:	1,469 SF
Total Available:	1,469 SF
Asking Rent:	£20.42/SF

SPACES

Floor	Use	Type	SF Avail	Bldg Contig	Rent	Rates	Ser Charge	Term
P GRND	Industrial	Relet	1,469	1,469	£20.42/SF	£7.10/SF		Negotiable

SALE

Last Sale: Sold on 24 Mar 1993 for £2,800,000 (£315.88/SF)

LOADING

Drive Ins: **Yes** Rail Spots: **None**

POWER & UTILITIES

Power: 3p

FEATURES

24 Hour Availability, Roller Shutters

TRANSPORTATION

Parking: 5 Surface Spaces are available
 Transit/Subway: 14 minute walk to Southfields Underground Station (District)
 Commuter Rail: 5 minute drive to Earlsfield Commuter Rail
 Airport: 51 minute drive to London City Airport

Lease Availability Report

Units 4-8, Glenville Mews Ind. Estate - Kimber Rd
London, SW18 4NJ - Wandsworth Ind Submarket



BUILDING

Type:	Light Industrial
Subtype:	Light Manufacturing
Tenancy:	Multiple
Year Built:	1956
GA:	9,453 SF
Floors:	1
Typical Floor:	9,453 SF
Ceiling Ht:	12'2"-16'4"

AVAILABILITY

Min Divisible:	2,387 SF
Max Contig:	2,387 SF
Total Available:	2,387 SF
Asking Rent:	£18.87/SF

SPACES

Floor	Use	Type	SF Avail	Bldg Contig	Rent	Rates	Ser Charge	Term
P GRND	Industrial	Relet	2,387	2,387	£18.87/SF	£6.66/SF		Negotiable

SALE

Last Sale: Sold on 14 Sep 2007

LOADING

Docks:	None	Drive Ins:	Yes
Cross Docks:	None	Cranes:	None
Rail Spots:	None		

POWER & UTILITIES

Power:	3p
Utilities:	Lighting - Fluorescent, Sewer, Water

FEATURES

24 Hour Availability, Roller Shutters, Security System

TRANSPORTATION

Transit/Subway:	13 minute walk to Southfields Underground Station (District)
Commuter Rail:	4 minute drive to Earlsfield Commuter Rail
Airport:	50 minute drive to London City Airport

KEY TENANTS

G & I Construction	1,410 SF
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APPENDIX B – OTHER PHOTOS OF WIDER BENDON VALLEY LSIA



Former Europcar and Safestore site (currently being demolished)



Former Mecca Bingo Hall – now a trampolining centre



Car park of former Mecca Bingo Hall



Vacant warehouse to let



Riverside Business Centre



Newer Building on Bendon Valley (Mr Resistor)



Units on Lydden Grove



Yard on Lydden Grove



Residential properties immediately adjacent to the LSIA on Lydden Grove



Vacant Unit on Bendon Valley



Earlsfield Business Centre



Crew Clothing Head Office Building



Rear of residential properties within the LSIA



Rear of Safestore/Mecca Bingo Site



Residential properties to the south of the LSIA (Haldane Place)



Residential and retail properties to the west of the LSIA (Garratt Lane)

COMMENTS ON THE WANDSWORTH LOCAL PLAN Nov 1st 2016

A Submission from some members of the former Carmalt Gardens Residents Association (CGRA) SW15 6NE

I think we in this corner of Putney have a few points to make about **enhancing local economic activity instead of relentlessly over-extending housing provision, as has been the norm hitherto.**

Our past can serve as a warning for the future through the following examples:

- 1.** In the late 1990s the rabbit warren of useful little **workshops** and **offices** behind and to the east of The Arab Boy were transformed into the purely **residential Fairfax Mews**
- 2.** For years up to the early 90s the buildings at 235 Upper Richmond Rd, by the "Putney Methodist Church" bus-stop, were **Wandsworth council social services offices**. Later in the 90s they became **commercial offices** where several of our residents rented space. Then the council saw the advantage of selling them to a developer at the same time as the neighbouring Church of Christ Scientist was being converted into flats (2000-2004). Thus we on the east side of Carmalt Gardens found ourselves facing yet more **private housing**.
- 3.** In 2002 or so we raised a petition of over 6000 signatures to save the **Adrian Hall garden centre** (just across the railway from the Putney leisure centre) when its council lease ran out. But there was no way the council with 'the country's lowest council tax' was going to miss out on such a ready source of income which would help keep the council tax down. **So goodbye valued little garden centre, and hello yet more housing anonymity!**
- 4.** We lost our local friendly **Total petrol station** in the early 2000s to the force majeure of the oil industry. But what might Lady Bracknell have said to us ALSO losing the **car showroom** and the **garage** and useful **little workshops** which extended right up to the tennis club? These were all replaced by the bland **des res** we now see in their place.
- 5.** In 2005 the **Robert Joy Day Centre** at 344 Upper Richmond Road closed as a lunch and leisure centre for pensioners and sold to private owners.

To summarize: Those of us who've lived in this Putney borderland (the even numbers in Carmalt Gardens are in East Putney, the odd numbers in West Putney) for say, ten years or more, might have noticed the changes in our environment from being largely residential to being almost exclusively so.

(We – especially those on our west side - are grateful that the tennis club cannot be replaced by even more housing!)

The Local Plan clearly militates against this trend of ever more housing and is designed to reverse it where possible.

We have lost most of the artisanal, productive and useful shops and businesses which we had up to roughly the turn of the century as Putney has become effectively a massive dormitory suburb largely reliant on supermarkets and boasting the highest concentration of estate agents in the country - plus an endless succession of coffee shops, pubs and phone shops.

So this is what the Wandsworth Local Plan is all about – to make provision for workshops, studios, offices and other work spaces in an attempt to regenerate economic, creative and other productive activity in the area.

Buildings which **combine** office or commercial space on the ground floor with residential accommodation above will be especially encouraged.

I would encourage anyone with their own personal views on the Local Plan to send them to the council before November 4th. i.e. to: www.wandsworth.gov.uk/planningpolicy

Submitted by: Bob Knowles 6 Carmalt Gardens, SW15 6NE

Former Chairman CGRA 1986-2008

Response to the
Wandsworth Local Plan: employment and industry review – Policy Options (October 2016)

Richmond supports the adopted spatial vision and strategic objectives for Wandsworth that are set out in the Core Strategy (2016). LBRuT will not comment on the individual sites and proposals in the policy option document.

Given the growth scenarios from GLA Economics, forecast demand for office floorspace indicates the need to provide premises for the local and sub-regional office market and the need for a firm line in protecting all kinds of employment floor space (quite apart from the separate large-scale national and international office market at Nine Elms.)

The evidence from Wandsworth's Employment Land and Premises Study (published in September) shows an increased demand for office floor space in Wandsworth and the FEMA (which includes Richmond) as well as a continuing demand for industrial land; and therefore Richmond strongly supports the protection of existing offices and industrial premises in order to meet this demand.

Industrial

Wandsworth is like Richmond identified as “restrictive transfer” in the London Plan. GLA's SPG benchmark release figure is that 41 hectares could be released for alternative uses over the 20 year period between 2010 and 2031. Since 2010 the amount of industrial land released in Wandsworth has been approximately 36.9 ha, which equates to 90% of the GLA SPG benchmark release figure having been let go in just the first 6 years of the 20 year period. Richmond would not wish to see continued rapid loss of industrial land, which may have a deleterious effect upon Wandsworth's capacity for businesses to start, grow and innovate and have negative impacts across the FEMA.

Key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea, should continue to provide opportunities for industry and warehousing as well as new waste management facilities. The borough will need to retain a significant quantity of industrial land in order to meet the forecast demand for industrial uses, storage, transport, waste and related infrastructure over the next 15 years. As the Vauxhall Nine Elms Battersea Opportunity Area has converted to other uses and the MUFIEAs can be developed into a range of opportunities for local business activity, including start up and small enterprises, in mixed use developments and other non-industrial uses, the remaining land currently designated as SIL (42.8ha) and LSIA (37.9ha) should be retained in its current designated use. Also, SIL is designated in the London Plan. Its loss could be a critical issue for servicing London and supporting the wider economy. On non-designated sites, provided that there is no continued demand for the existing industrial or distribution use, Richmond would support redevelopment that prioritises alternative employment uses.

Offices

Policies can maximise the employment potential of land in the borough by safeguarding land and buildings for business and employment use and promote development for employment purposes in appropriate locations including as part of mixed use development in order to increase job and business opportunities.

Forecasts suggest a strong positive demand for new office floorspace, for the local/sub-regional market. The local plan can continue to seek to protect office floor space for those offices situated in smaller office clusters in the borough, particularly those serving local markets and providing floorspace for SMEs, and have good public transport accessibility or are located close to town and local centres. Notable clusters could be

protected through Article 4 Directions, an approach adopted by Richmond Council.

New floor space.

Given the large scale residential development in Wandsworth, it may be the case that the borough does not have the appropriate business space available to meet its future jobs demand, which could impact on neighbouring boroughs and across the FEMA.

Richmond would support Wandsworth Council in promoting the provision of flexible business space to meet the needs of small and medium enterprises in appropriate locations, including as part of mixed-use development so as to increase job and business opportunities throughout the area.

Hopefully our response is helpful to you in terms of the employment and industry policy options.

4 November 2016

Planning Policy and Design Team
LB Richmond upon Thames
Civic Centre
44 York Street
Twickenham, TW1 3BZ

DRAFT

our ref: **BF/Q70059**
your ref:
email: ben.ford@quod.com
date: 31 October 2016



Policy and Design Team
Planning and Transport Environmental & Community Services
Wandsworth Council
Town Hall, High Street
Wandsworth
London
SE18 2PU

By email: Planningpolicy@wandsworth.gov.uk

Dear Sirs,

WANDSWORTH LOCAL PLAN EMPLOYMENT AND INDUSTRY REVIEW
POLICY OPTIONS CONSULTATION 7 OCTOBER 2016 – 4 NOVEMBER 2016

We are instructed by our client London Square to submitted representations to the London Borough of Wandsworth Consultation on the 'Employment and Industry Review – Policy Options'. This consultation period will run from the 7 October to the 4 November 2016 and these representations are submitted within this relevant time frame.

a) Background

Our client London Square has been appointed as the developer for the B&Q site on Swandon Way.

This site has been identified as falling within the C23 (Map 10.15) Smugglers Way, Marl Road and Jews Row employment area and therefore our client has a material interested in the preparation and drafting of this document as it not only affects policies within the London Borough of Wandsworth but specifically seeks to affect their land interest.

Map 10.15 C23: Smugglers Way, Mark Road, Jews Road

