

necessary. Policy 4.10 Part A(c) (New and Emerging Economic Sectors) of the FALP states that Council must work with developers and businesses to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space'.

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?

No. Our client is supporting the low growth scenario as we consider the predicted provision will meet demand.

The sites put forward for re-designations should not be retained for industrial and distribution uses. These sites have all been recommended for re-designation following the detailed ELPS conducted by AECOM.

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?

Wandsworth have failed to emphasise the importance of intensifying their industrial uses across all designations. SILs, LSIA and MUFIEAs despite the recommendations of the ELPS report and the London Industrial Land Supply & Economy Study 2015. Recommendation 5 of the ELPS states:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation only references the Havelock Terrace site, the reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land.

The London Industrial Land Supply & Economy Study 2015 goes on to suggest that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield). Going forward, London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

The rate of release for 2010 to 2015 is 105ha per annum compared with the SPG recommended rate of release of 36.6ha per annum. The Council must carefully consider what the impact of this continued decline in industrial land will have on the form of its industrial areas. Once combined with the uncertainty fuelled by Brexit, the Council must carefully consider measures to adapt to these factors. We consider that increased flexibility and promotion of higher density developments within the existing designated industrial is prudent for Wandsworth.

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?

Our client welcomes the intensification of employment on their site – the former bingo hall. However the re-designation to a newly founded Employment Intensification Area (EIA) is not considered necessary.

In our previous representation we approved of the flexibility afforded by the MUFIEA designation. In its current form MUFIEAs encourage rather than restrain new development and appear to provide a fantastic opportunity to diversify employment uses on sites whilst simultaneously intensifying the uses that currently operate there. The designation would suit our current vision for our client's site, in that it encourages the incorporation of multiple uses (including commercial, employment and community facilities) on site in order to generate opportunities for unified, coherent regeneration on our client's site.

However, the development of suitable business space for Small and medium-sized enterprises (SMEs) should be given more prominence within the MUFIEA policy. These businesses would greatly benefit from the mix of uses permitted within MUFIEAs as well as the complimentary commercial elements that are located on Garratt lane. The encouragement of SMEs is clear opportunity for the Council promote intensification of employment floorspace whilst achieving the objectives of MUFIEAs set out in Policy DMI2. We would also encourage that the promotion of SMEs are given more prominence in this policy and other relevant polices such as Policy PL 6 (Meeting the needs of the local economy).

Employment Intensification Areas (EIAs) appear to be much the same as MUFIEA designations in that they seek to increase the density of existing uses whilst providing complimentary commercial, employment and community uses; however EIAs do have a greater focus on providing SME workspace.

We consider that the new EIA designation is not necessary as it would over-complicate the existing industrial hierarchy; the MUFIEA designation could be altered very slightly to accommodate the EIAs aims instead. The sites Wandsworth Gas holder site and the Former Bingo Hall are currently being considered for re-designation to EIA, we suggest that they are either given status as an MUFIEA or as an allocated site.

Furthermore, the Council should seek intensification more broadly across its SIL, LSIAs, MUFIEAs and undesignated industrial sites as opposed to isolating the aim solely within the new EIA designation.

Question 28

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

In our previous representation we approved of the flexibility afforded by the MUFIEA designation. In its current form MUFIEAs encourage rather than restrain new development and appear to provide a fantastic opportunity to diversify employment uses on sites whilst simultaneously intensifying the uses that currently operate there. The designation would suit our current vision for the site, in that it encourages the incorporation of multiple uses (including commercial, employment and community

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Furthermore, the Council should seek intensification more broadly across its SIL, LSIA, MUFIEAs and undesignated industrial sites as opposed to isolating the aim solely within the new EIA designation.

Question 29

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

If either of the MUFIEA or EIA designations were adopted, attaching specific quantities or mixes of floorspace could be too prescriptive. Each case will have different challenges and aims on the side of both the developer and the Council. We consider that the Council should allow flexibility for these sites so that they can come forward naturally in the future. We consider that it would be incredibly difficult to provide an exact quantum for development which would apply to all sites and would remain relevant throughout the entire lifetime of the Local Plan, i.e. the ELPS report raises concern over the short to medium term impact of issues like Brexit, whilst the long-term effect are too difficult to predict. Sites which share the designation should have similar strategic objectives but if these targets are too rigid then this can hinder development coming forward in these areas. Therefore, quantum of floorspace should be decided on a site-by-site basis.

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?

A similar spatial strategy could prove beneficial for the former bingo hall site. To ensure that the strategy is appropriate for the site the Council should liaise with our client in order to secure a positive outcome for the both parties.

To assist the Council in developing a strategy, please refer to the high level masterplan prepared by AHMM Architects (copy enclosed). The masterplan sets out the existing site constraints (which include site access, aged accommodation and physical barriers) and site opportunities (which include enhances employment accommodation, improved street scene, improved vehicular and pedestrian access, improved relationship with Garrett Lane, mixed use development). Crucially these plan's also include the Riverside Business Centre to the west of the bingo Hall which has not been recommended for re-designation at this stage.

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?

We consider that the Local Plan could continue to outline high level of design requirements expected from developments however rent level, leasing and management may fall outside of the planning requirement. These requirements should avoid being overly prescriptive by allowing for flexibility in order to attract and accommodate a wide range of employment opportunities.

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?

The consideration and demonstration of employment and residential uses complementing each other is already a key test within any mixed-use planning application. The relationship between residential and employment uses needs to ensure they work in harmony both physically and operationally.

Question 41

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

We do not agree that affordable creative workspace should be addressed in a prescriptive manner, for large scale developments or otherwise. We consider the requirement for 'affordable workspace' may actually restrict certain developments which already have to meet a wide range of policy requirements, including affordable housing. There is also uncertainty regarding the definition of 'Affordable Workspace' and what it would actually comprise.

Our client considers that their 'Workspace' business plan is already an 'affordable' business offer but it should not become prescriptive within policy as it needs to remain flexible.

Our client, Workspace cater to the modern SME market which requires well managed, modern, flexible B1 space, offered with flexible lease arrangements. The business plan providing rolling leases which can be adapted as the businesses grow. The floorspace are flexible and can be increased in size when needed. The rents are reasonable for starter businesses. Given the relatively low open market rents for modern SME space across London, Workspace Group has found that in certain circumstances the replacement/regeneration of the historic business space will only be viable/achievable either through significantly increasing the business accommodation provided at the

site or via an integrated mixed-use development (incorporating higher value uses such as residential and local retail - which will effectively act as an enabling development to subsidise the provision of the replacement business space).

This model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio including the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. Our client already succeeds in meeting the provisions of DMPD Policy DMI4 by providing flexible leasing agreements and realistic rents. Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan, however an overly prescriptive approach from the Local Authority could threaten to disrupt our client's successful model.

Question 42

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

Please refer to our answer to question 41

Question 43

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

Please refer to our answer to question 41

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?

It is unrealistic to expect like-for-like reprovision of the existing uses on site when redeveloping LSIs. Modern demands for particular types of flexible employment floorspace (suitable for SMEs, etc.), may call for a greater provision of particular uses. In the case of communal SME floorspace, the provision of non-industrial uses is often needed to serve the various tenants, thereby encouraging businesses to locate there and creating a strong business community.

Our client's business model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio. Indeed, as the Council will be aware, the recently completed redevelopment of the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. The residential and non-B1 components of the scheme cross-subsidised the replacement of the existing (and largely out-moded) business space at the site with a new 'flexibly designed' business centre. The scheme also provided wider improvements to the Hardwicks Quarter).

Through increasing the density of development, the reprovision of industrial floorspace is possible but the introduction of non-industrial uses are often required to act as enablers for redevelopment. It is unrealistic for the Council to expect full replacement provision of every use type in each scenario and must recognise modern day demands relating to industrial uses have changed.

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, we consider the contrary. As stated above, non B1(c), B2 and B8 uses are essential to facilitate

the refurbishment or re-provision of B1(c), B2 and B8 uses.

Summary

We trust the above response is of assistance and will enable our client's site to be reviewed in light of the responses. We would be more than happy to meet officers on site to discuss the key issues outlined above and our suggestions for the formulation of future policy.

We look forward to hearing your views in relation to the above in due course.

Yours faithfully,

Chris Brown

Chris Brown
Rolfe Judd Planning



Wandsworth Council

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

Please ask for/reply to: Rob McNicol
Telephone: 020 8871 6000
Direct Line: 020 8871 8814
Email: planningpolicy@wandsworth.gov.uk
Web: www.wandsworth.gov.uk/planningpolicy

6 October 2016

* Name and Address

Dear Sir/Madam

Wandsworth Local Plan: employment and industry review – policy options

The council is producing a new Local Plan document covering employment premises and industrial land. This document will form part of the Local Plan for Wandsworth, setting out relevant planning policies and allocating sites. It will replace the employment and industrial land policies in the existing Local Plan documents – the Core Strategy, Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD). To inform the employment and industry local plan document, the council are undertaking a policy options consultation.

This letter invites you to make representations on the Council's policy options. The consultation will be carried out between 7 October and 4 November 2016.

The policy options are set out in a Policy Options Document, which has been informed by the responses to the Preparation Stage (Regulation 18) consultation carried out between December 2015 and January 2016, and the findings and recommendations of the Employment Land and Premises Study 2016.

Responses made to the policy options consultation will be assessed and will inform the proposed submission version of the employment and industry local plan document.

How to find out more information

Links to the consultation portal, Policy Options Document, Employment Land and Premises Study are available on the Council website at:

www.wandsworth.gov.uk/employmentlandreview

How to respond

We encourage you to respond on-line, as this greatly assists us in collating, analysing and considering the responses. If you are not able to respond on-line, please email planningpolicy@wandsworth.gov.uk or send written responses to:

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

Responses must be received by Friday 4 November 2016.

If you have any questions about the review, please phone Rob McNicol on 020 8871 8814.

Technical Details

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out how the Council must prepare Local Plan documents, including the requirements for consultation. The current consultation is an additional round of consultation to the preparation stage (Regulation 18), which was undertaken from December 2015 to January 2016, and the publication stage (Regulation 19) which it is intended to undertake from March to April 2017.

Yours faithfully,



John Stone

Head of Planning and Transport Strategy

Memorandum

From: HCS Planning Service

Contact: Rhian Williams

Extn: 7218

Our Ref: Local Plan - libraries

To: The Librarian

Battersea Library (5TC libraries
and Planning offices)

Date: 5 October 2016

Wandsworth Local Plan: employment and industry review – preparation stage

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We are carrying out a policy options consultation between **7 October** and **4 November 2016**. Responses can be submitted either through our consultation portal <http://wandsworth-consult.limehouse.co.uk/portal>, by email to planningpolicy@wandsworth.gov.uk or in writing to:

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

We have advertised via the Council website and by letter to local groups and other key stakeholders that copies of the Policy Options Document are available for reference at selected local libraries.

Please find attached a copy of the document, which is clearly marked and should be available for users of your library for reference purposes only. We are encouraging electronic responses but further paper copies are available on request. Hopefully the material is self-explanatory but further information and downloadable versions of all the documents can be found on our website:
www.wandsworth.gov.uk/employmentlandreview

If you, your staff or any visitor to your library wants further information, copies of the documents, or to discuss matters, then please give me or my colleagues a ring on 020 8871 6647, 6649, 6650 or 7218.

Thanks very much for your help,

A handwritten signature in black ink, appearing to read 'John Stone', with a horizontal line drawn through the middle of the letters.

John Stone