

Local Plan: employment and industry - preparation stage consultation
report

Local Plan: employment and industry consultation report

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1 Introduction

1.1 Wandsworth Council is producing a new Local Plan document covering employment premises and industrial land. The new 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.

1.2 The production of the new Employment & Industry Local Plan document goes through a number of stages, set out below. The first part of stage 1 was a public consultation, carried out in December 2015/January 2016. The consultation set out:

- The reasons for the review;
- How the review will be carried out and the timetable for this work;
- The existing Local Plan policies that are intended to be replaced;
- The proposed areas for review.

1.3 This consultation was carried out in accordance with Regulation 18 of [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) and the council's adopted Statement of Community Involvement.

1.4 This consultation report summarises the 31 responses that were received. For each issue, a response to the matters raised is given, detailing how Wandsworth Council intend to pursue the issue. In most instances, this is through further, more detailed consultation in the forthcoming Policy Options Consultation, due to be carried out in October 2016. Some issues will be discussed further with the respondent and other relevant organisations, including through Duty to Co-operate meetings.

1.5 The full text of each response is available online at www.wandsworth.gov.uk/employmentlandreview.

Stage	Exercise	Timeframe
Stage 1: Preparation	Regulation 18 preparation stage consultation	Dec 2015 - Jan 2016
	Employment Land Study (AECOM)	Apr 2016 - Jul 2016
	Call for sites	Jun 2016 - Sep 2016
	Policy options consultation	Oct 2016
Stage 2: Publication	Publish submission version	Mar 2017
	Regulation 19 submission version consultation	Mar - Apr 2017

Stage	Exercise	Timeframe
Stage 3: Examination	Submission to Secretary of State	Oct 2017
	Examination	Dec 2017 - Apr 2018
Stage 4: Adoption	Adoption	Jul 2018/Dec 2018

2 Key themes

2.1 The responses received to the Regulation 18 stage consultation covered a broad spectrum of views. There was widespread support for the overall approach proposed, with most respondents in support of a partial review in order to ensure that the Local Plan reflected changes in the provision of office floorspace in the borough. A number of respondents in particular mentioned the impact of permitted development rights for the conversion of offices to residential use or highlighted the need to meet the needs of the borough's economy. to ensure that businesses are supported and to avoid Wandsworth becoming a 'dormitory borough'.

2.2 Generally there were potentially divergent views between amenity groups and businesses, that broadly sought stronger protection of employment premises, and land owners and developers who were more in favour of introducing increased flexibility for land use, either through allowing a mix of uses including residential use into industrial areas or encouraging redevelopment of industrial areas to meet demand for office and other business floorspace.

2.3 The importance of supporting small and medium enterprises (SMEs) was raised by various respondents, in particular in relation to start-up businesses, and the need to respond to the changing economy and emerging sectors and types of business floorspace, for example managed workspaces.

2.4 A number of sites within areas currently designated as protected industrial land were promoted for alternative uses, primarily in the Central Wandsworth and Bendon Valley Locally Significant Industrial Areas (LSIAs) and the Queenstown Road Strategic Industrial Location (SIL).

3 Responses to the proposed areas for review

3.1 Overall approach

3.1 The consultation document asked:

Overall approach

Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?

3.2 A clear majority of respondents agreed that the production of a single Employment and Industry Local Plan document is the best way to plan for these uses in the borough.

3.3 The GLA provided a reminder that the plan will need to be in conformity with the London Plan and Generator Developments also raised the requirement for conformity. Richmond Council mentioned the benefit of neighbouring boroughs taking a similar approach.

3.4 Nicholas Taylor and Associates and TR Property Investment Trust consider the 2010 Core Strategy and 2012 DMPD policies to be out of date. Ipsus Development commented that a full Local Plan review is a process that takes time; all three considered that a single document is the best approach at this time.

3.5 Natural England and National Grid were keen to be kept informed of the progress made but had not comment to make at this time.

Council Response

3.6 Wandsworth Council welcomes the support given for the overall approach to the review. The comments of the GLA and Richmond Council are noted; the Council continue to work in close partnership with the GLA and Richmond Council, as well as other neighbouring boroughs and partnership organisations.

3.2 Strategic issues

3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)

3.7 The consultation document asked:

Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)

Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?

The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so, which areas and why?

3.8 In general respondents were supportive of the protection of employment land but many sought more flexibility in terms of the acceptable uses in SILs and LSIA. Most respondents indicated that they would be supportive of the consideration of a wider range of employment-generating uses in these areas than currently permitted by adopted policies. Most of the landowners and developers who responded also suggested that residential uses should be considered appropriate.

3.9 The Greater London Authority (GLA) were supportive of an evidence-based review and stressed the need to ensure that the borough retains sufficient land to meet the needs for industrial and related uses, both local and strategic over the lifetime of the plan. The GLA highlighted the need to re-invigorate existing industrial areas and, where a loss can be justified, to explore mixed-use schemes. Sites near good public transport provision should be prioritised.

3.10 A number of individuals and local amenity groups (Putney Society, Helen Evans, Alan Pates, Chris Brodie) expressed concern about the loss of industrial land to new residential development and requested that the Council protect or re-provide employment land to protect local jobs and ensure a mixed economy. The Tonsley Residents' Association highlighted the need to consider under-use and length of vacancy in determining which areas to release.

3.11 Wandsworth Chamber of Commerce commented that there are very few industrial areas left in the borough and that this remaining land should be maintained and protected, particularly in the case of uses that do not mix well with residential use. They suggested that the council should aim to maximise employment densities as part of any re-designation or change in policy for industrial areas. Chris Brodie also commented that the study should take a holistic approach and consider other non-residential employment-generating uses where any designations are proposed to be changed.

3.12 A number of developers and landowners (Generator Developments, Office Estates Ltd, Ipsus Developments Ltd, St William Homes, Callington Estates, TR Property Investment Trust PLC, Workspace Group PLC, Schrodgers Real Estate Investment Management, Charterhouse Property Group) responded seeking flexibility in the appropriate uses in SILs and LSIA, requesting principally that the areas be released for mixed use including residential development.

3.13 Callington Estates Ltd sought a review of the boundaries of SILs and LSIA with a view that certain sites at the edge of the current areas could be removed from industrial designation.

3.14 TR Property Investment Trust called for differentiation of the policies for SILs and LSIA to reflect their distinct character and uses. They also suggested that policies which protect industrial land should allow for the release of premises that have been marketed for 18 months or more and are not in demand.

Sites and areas proposed for review or re-designation

3.15 Spatially, the areas suggested for review by respondents were:

- Havelock Terrace (in the northern part of the Queenstown Road SIL) - suggested by Workspace Group for other employment/SME uses and residential
- Battersea Studios, Silverthorne Road (western part of Queenstown Road SIL & Industrial Business Park) - suggested by Schrodgers Real Estate who proposed extending the Industrial Business Park boundary to the east and allowing residential uses
- Ingate Place, Queenstown Road SIL - suggested by Safestore
- Bendon Valley - suggested by Generator Developments and Ipsus Developments for mixed use (employment and residential)
- Central Wandsworth (LSIA) - put forward by St William Homes, TR Property Investment Trust, Charterhouse Property Group and Wandsworth Chamber of Commerce for mixed use (employment and residential)
- Summerstown LSIA - Chris Brodie suggested a review of the extent and function of the Summerstown LSIA given the planned development of Wimbledon Stadium and nearby works for Crossrail 2.

Council Response

3.16 The Council recognises the general support for continuing to protect employment land in the borough and the need to ensure that the release of industrial land is guided by evidence and an understanding of the specific areas. To support this work, the Council has commissioned a new Employment Land Study from AECOM to report on the supply and demand of employment premises in the borough.

3.17 The specific areas identified by respondents have been investigated by AECOM and the Planning Policy Team. The policy options stage of the review will consider which specific areas should be prioritised for re-designation for other uses, as supported by the evidence in the Employment Land Study. The forthcoming policy options consultation stage will allow respondents to provide further evidence and information regarding specific areas and how re-designation might meet the strategic priorities of the Local Plan.

3.18 The types of uses that the Local Plan will allow in the SIL and LSIAs will be explored further in the policy options consultation stage, however it should be noted that the borough is categorised in the London Plan as a restricted transfer borough. This designation encourages boroughs to adopt a more restrictive approach to the transfer of industrial sites to other uses in protected industrial areas, and reflects the limited quantity of industrial land in the borough.

3.2.2 Mixed Use Former Industrial Employment Areas

3.19 The consultation document asked:

Mixed Use Former Industrial Employment Areas

Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas?

3.20 There was widespread support for the borough continuing to seek mixed use redevelopment of former industrial employment sites.

3.21 The GLA stated that it is unclear whether 'former' referred to industrial land that had already been released as part of recent Local Plan review, or if it assumed that the review would result in the release of industrial land. Notwithstanding either outcome an evidence based loss of industrial land would be required.

3.22 Ipsus Development considers a more flexible approach should be applied to MUFIEAs. Their suggested approach would allow replacement of equivalent number of jobs rather than equivalent floor space. Workspace PLC also raised the issue of flexibility. They consider that the MUFIEA designation offers flexibility rather than restraint. However they consider that SMEs should be given more prominence in the body of the policy rather than just the explanatory text.

3.23 St William Homes think that the proposed approach does not take the fact that different employment uses have different densities into account. They also consider that the changing floor space needs of a business have not been taken into account.

3.24 The Wandsworth Chamber of Commerce recommended that a more balanced view of mixed use development needs to be applied. They are of the opinion that mixed use currently is overwhelmingly residential and that employment and office floor space should be offered on upper floors.

3.25 Alan Pates mentioned the vibrancy that mixed use areas provide and the support they give to local shops. He talked about the need for start up spaces for businesses.

Council Response

3.26 The comments of the GLA are noted; to clarify the position, this aspect of the consultation relates to a policy designation in the adopted Local Plan 2016 which was first introduced in the original Core Strategy 2010. This designation covers specific areas that were formerly (ie prior to 2010) protected for industrial uses. The policy sought to allow these areas to be redeveloped for a mix of uses including residential use; this has occurred in some instances whereas other sites have yet to come forward for redevelopment and retain their industrial uses and character. It is agreed that the terminology used in this

designation is unclear and this will be reviewed. The review will fully explore all options for protecting and/or re-designating industrial land (whether currently protected or not), and will be evidence-based; there is no inherent assumption that the review would inevitably lead to further loss of industrial land.

3.27 The suggestions regarding employment densities and the variation in densities between different uses are noted. The employment land study commissioned from AECOM will take into consideration differences in employment densities between different uses as well as trends towards higher density occupation of office floorspace. It should be noted that the NPPF and the strategic priorities of the Local Plan require the Council to plan both to support the economy of the area as well as provide space for jobs; whilst some uses may have a lower employment density than others, these uses may still play an important part in supporting the local and wider economy. Conversely, only requiring new development to replace equivalent numbers of jobs could result in very low numbers of jobs in areas where there is scope to provide higher density development, such as around transport interchanges and in town centres.

3.28 The needs of SMEs, the emerging typologies of managed workspace, and the quantum and arrangement of employment floorspace in mixed use development will all be explored further in the policy options consultation.

3.2.3 Offices

3.29 The consultation document asked:

Offices

Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?

3.30 There was general concern about the loss of office space in the borough and general support for the focus of office development to be retained in the town centre and focal points of activity.

3.31 The Putney Society suggested that the borough should be stricter with respect to the loss of existing office space. The Wandsworth Chamber of Commerce also consider that the loss of office provision needs to be halted.

3.32 St William Homes and Ipsus Developments Limited pointed out that the GLA projections show that professional, real estate, scientific and technical services are among the industries that are projected to grow and these sectors will need office space.

3.33 Office Estates Limited are of the opinion that some sites outside town centres and focal points are suitable for office development and would encourage a flexible approach.

3.34 Miriam Howitt highlighted a need for inexpensive small premises for start-up businesses. The need to provide floorspace for SMEs was also raised by Workspace Group PLC,

Council Response

3.35 Given the quantity of office floorspace that could be lost due to permitted development in the borough, the Council share concerns around the loss of office floorspace. Options to address this are explored further in the policy options consultation and the Council intend to propose that an Article 4 direction is put in place in order to restrict further unmanaged loss of office floorspace in appropriate parts of the borough.

3.36 The options for identifying sites for new office development will be set out in the policy options document. This will include looking closely at the potential of sites within town centres as well as edge-of-centre and other locations. The Council are also undertaking a call for sites in order to establish unidentified sites with potential to provide new office (and other) floorspace.

3.37 The Council recognises the need for affordable workspace for small and start-up businesses. The policy options document will explore ways in which this need can be met.

3.2.4 Waste

3.38 The consultation document asked:

Waste

It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and site in the employment and Industry Local plan document.

Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities?

3.39 The Royal Borough of Kensington and Chelsea is part of the Western Riverside waste authority with Wandsworth, Lambeth and Hammersmith and Fulham. They commented that existing waste management facilities should not be prejudiced by the release of existing employment or industrial land to other uses.

3.40 Respondents including Adam Pates and The Putney Society deem that the approach set out in the document is appropriate.

3.41 The GLA advised that waste policies should be in line with London Plan policies and that sufficient land should be safeguarded. Assessment of potential sites should include an assessment of detrimental impacts (eg vehicular movement) on the neighbouring land uses.

3.42 The Wandsworth Chamber of Commerce hold the view that there is an opportunity to integrate waste management sites as they are strategically important with business premises neighbours which are less sensitive than residential areas.

3.43 The Tonsley Residents' Association highlighted the need to ensure that waste management activities are not prejudiced by neighbouring development.

Council Response

3.44 The concerns of the Royal Borough of Kensington and Chelsea are noted, and any option to re-designate industrial or employment land for other uses will take into consideration the impact on the provision of waste sites. It is intended at this stage to retain the existing waste designations and policies in the borough and to review these further as part of the forthcoming full review of the Local Plan, which will be informed by the emerging approach in the forthcoming London Plan review. The policy options consultation will seek views as to whether this is the best approach to take.

3.3 Spatial approaches

3.45 The consultation document asked:

The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.

Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?

3.46 In general there was support for a spatial strategy approach to the review of employment and industrial land (Historic England, Environment Agency, Putney Society, Wandsworth Chamber of Commerce).

3.47 Historic England advocated for a characterisation of the borough's historic environment to understand the significance of Wandsworth's built and archaeological heritage and suggested that a borough-wide approach would be most effective and comprehensive. They were also supportive of more localised characterisations tailored to areas under review and

cited the outline study for the Old Oak Common former industrial area as a positive example. Historic England also raised specific issues relating to the need for industrial heritage assets to be identified and the potential for these assets to guide regeneration plans as well as referring to a study they are conducting on the significance of gas holders nationally.

3.48 The Putney Society were supportive of a spatial strategy approach but raised concerns about the principles set out in spatial strategies and SSAD sites not being adhered to when assessing development proposals. They also raised issue with the form of the question in the consultation document which they felt suggested that the Council prioritised the needs of developers over local residents.

3.49 Wandsworth Chamber of Commerce were also supportive of a spatial approach to provide clarity for developers and occupiers. They considered that by making the appropriate uses in various areas clear no unreasonable burdens would be placed on developers who put forward policy-compliant schemes.

Council Response

3.50 The Council notes the general support for a spatially-led approach to planning for areas where there is significant change. This approach will be continued in the Local Plan review with area spatial strategies drawn up or reviewed for appropriate areas. These will take into account the history and character of the area, and for areas with an industrial character the area spatial strategies will identify industrial heritage assets and use this character to guide future development. The area spatial strategies and site allocations will provide clarity regarding the uses that are appropriate, as the Wandsworth Chamber of Commerce advise.

3.51 The concerns of the Putney Society are noted; the Council agrees that the needs of residents and those who work in and enjoy an area should be taken into account in plan making and when taking planning decisions. Development proposals should be considered against the spatial strategies and site allocations, although in some instances there may be other material considerations that require a different approach. The Council intent to use the current review of the Local Plan to provide an opportunity to review the focus of the relevant site allocations and area spatial strategies to ensure that they are up to date and guide decision-making as closely as possible.

3.4 Specific policies

3.52 The consultation document asked:

Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?

Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?

Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?

3.53 The Putney Society do not believe that the existing Local Plan policies have satisfactorily protected the employment land and premises in the borough to date. They consider that there is a growing demand for office space and call for a clearer distinction between office use and other commercial uses. The Putney Society suggest that small business are best supported by ensuring that small offices and similar premises are protected from development or conversion to residential and retail use.

3.54 Helen Evans suggested that business rates for start ups and incubators be reviewed.

3.55 The Port of London Authority did not raise any objection to the review of employment and industry land but raised issues around safeguarded wharves, noting that, while not the focus for review, there are potential impacts on wharves if there are changes to waste sites. The PLA sought to ensure any review protects the safeguarded wharves in line with London Plan and related waste policies.

3.56 Wandsworth Chamber of Commerce requested a specific policy for SMEs which reflects the unique needs of smaller businesses. They suggested this should include support for a broad range of uses, co-working and serviced office space and indicated that there is a strong demand for this type of space in inner London. They also stressed the need for employment spaces to be supported by appropriate infrastructure including high-speed broadband.

3.57 The Environment Agency commented that the review should take on board the need to implement improved flood defences as part of the TE2100 Plan for relevant areas including the Thames riverside and suggested that any changes to site allocations should consider opportunities to improve biodiversity and increase resilience to climate change. The EA also commented on the need to align the review with the adopted Local Plan policies and other emerging plans and policies, as well as working with all parties involved in major regeneration schemes.

3.58 Thames Water responded to consultation to raise issues around the provision of appropriate water and wastewater infrastructure as part of new development.

3.59 Anthony Seale requested that the review consider protection of larger commercial premises such as the large supermarkets located in Clapham Junction.

Officer Response

3.60 The comments of the Putney Society are noted. Permitted development has had a significant impact on the supply of office premises in the borough and restricted the Council's ability to apply Local Plan policies. The Council are exploring the implementation of an Article 4 Direction to restrict permitted development relating to change of use of offices to residential uses in appropriate parts of the borough. The Council will also explore how the needs of SMEs can best be met through the policy options document, including through co-working and serviced office space.

3.61 The setting of business rates is not an issue that can be decided in the Local Plan, however this will be explored further with internal colleagues.

3.62 At this stage the Council are not intending to review waste allocations or safeguarded wharves; these will be reviewed as part of the forthcoming full Local Plan review.

3.63 The Council will continue to work closely with the Environment Agency and Thames Water to ensure that water management, flooding, biodiversity and climate change issues are taken into account in the review.

3.64 It is not intended at this stage to review the retail requirements of the borough; this is intended to be carried out as part of the forthcoming full Local Plan review. Sites in town centres will be assessed to establish whether they have potential to help meet the need for new office development; this will be explored further in the policy options document.

Appendix 1: List of respondents

Respondents are listed in alphabetical order (by surname where submitted by an individual).

Consultee	Agent	Site
38 Havelock Terrace	Mandip Sahota (Nicholas Taylor & Associates)	38 Havelock Terrace
Chris Brodie		
Callington Estates Ltd	Roger Birtles (Simply Planning Ltd)	
Charterhouse Property Group	Kieran Wheeler (Savills)	Point Pleasant Works (HSS Hire), Putney Bridge Road
Clapham Junction Action Group		
Covent Garden Market Association		New Covent Garden Market
Environment Agency		
Generator Developments LLP	Anna Snow (Iceni Projects)	Area to the north of Lydden Road, Bendon Valley
Greater London Authority		
Historic England		
Miriam Howitt		
Ipsus Developments Ltd	Helen Courtney (Boyer Planning)	38-54 Lydden Road, Bendon Valley
London Borough of Richmond		
National Grid		
Natural England		
Office Estates Ltd	Colin Sinclair (DP9)	
Panorama Antennas Ltd	Kevin Watson (Gerald Eve)	61-63 Frogmore and 10 Dormay Street

Consultee	Agent	Site
Alan Pates		
Port of London Authority		
Putney Society		
Royal Borough of Kensington and Chelsea		
Safestore Ltd	Adam Conchie (GVA Grimley)	
Schroders Real Estate Investment Management	Jeremy Castle (Deloitte)	
Anthony Seale		
St William Homes	Hayley Ellison (Boyer Planning)	
Thames Water Utilities Ltd	David Wilson (Savills)	
Tonsley Residents' Association		
TR Property Investment Trust PLC	Chris Brown (Rolfe Judd Planning)	Ferrier Street Industrial Estate
Wandsworth Chamber of Commerce		
Wandsworth Society		
Workspace Group PLC	Chris Brown (Rolfe Judd Planning)	Hewlett House and Avro House, Havelock Terrace; Riverside Business Centre, Bendon Valley