

Wandsworth Local Plan  
Employment and Industry Document  
Consultation responses and Council responses  
Representor ID Number Order  
October 2017



# Local Plan Employment and Industry Document Regulation 19 Proposed Submission Representations and Response

## Wandsworth Local Plan: Employment and Industry document - proposed submission (March 2017)

Representor's Name	Representor Organisation	Title	Para	Representor ID	Wish to be heard?	Legally compliant?	Sound?	Duty to co-operate?	Response	Changes necessary	Officers' Recommendation	Outcome
Unknown	Royal Borough of Kensington & Chelsea	Waste	Policy E18	678	Not Specified	Yes	Yes	Yes	<p>The Council acknowledges that the strategic approach to waste management is not part of the Employment and Industrial Land Review and that it will be reviewed as part of a full review of the Wandsworth Local Plan. The reasoning is set out in the Wandsworth October 2016 consultation document. This is a similar approach taken to some policy areas of the RBKC Local Plan Partial Review.</p> <p>Currently all of Kensington and Chelsea's municipal waste goes to the Western Riverside Waste Authority's facilities in the London Borough of Wandsworth for transfer and treatment. You will no doubt be aware that Wandsworth has been working closely with Kensington and Chelsea, Hammersmith and Fulham, Lambeth and the Old Oak Park Royal Development Corporation, as Waste Planning Authorities, to produce a joint Waste Technical Paper regarding the authorities' London Plan waste apportionments. The conclusions of the joint Waste Technical Paper, any further joint work undertaken and the addition of OPDC as part of the grouping of WPAs working together in the Western Riverside Waste Authority area should be incorporated into the future full review of this policy.</p> <p>It is essential that the existing waste management facilities are not prejudiced by the release of existing employment or industrial land to other uses. This could be through the release of the actual sites themselves or by the development of adjoining sites in ways which may prove incompatible with the neighbouring</p>		Comments noted. No change required.	

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									waste use. The sites of particular importance to Kensington and Chelsea Council are the Western Riverside Transfer Station near Wandsworth Bridge and the Cringle Dock Transfer Station next to the Battersea Power Station site.			
Unknown	Royal Borough of Kensington & Chelsea	Protected wharves	Policy EI 9	678	Not Specified	Yes	Yes	Yes	Kensington and Chelsea Council is also aware of proposed development to take place at Cringle Dock and have been informed that this will not result in a loss of capacity at the facility. The proposal includes provisions for the transfer of wharf designation to Smugglers way, this should also be reflected in the future full review when this is undertaken.		Comments noted. No change required.	
Unknown	Scotia Gas Networks & National Grid	Locations for new employment floorspace	Policy EI 2	982	Not Specified	Not specified	Not specified	Not specified	<p>Part (6) of the policy states that:- "Applications for office floorspace over the 2,500 sq ms threshold will need to be justified by an impact assessment, in accordance with the NPPF." This policy is not consistent with national policy.</p> <p>The NPPF states that:- "When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m)."</p>	By default, the allocations and sites referenced within Part (1) of the Policy will be related to an up to date local plan, and therefore these locations should be exempt from the requirement to submit an impact assessment.	<p>Comments noted. No change required. It is considered that Policy EI2 is sound and based on robust and credible evidence. The wording of Policy EI2.2 reflects the adopted Development Management Policies Document (2016) Policy DMTS2(c) which states that; 'Retail, leisure and office developments which exceed the 2,500sqms floorspace threshold set out in the NPPF must also be accompanied by a Retail Impact Assessment, with the scope to be agreed with the Council and proportionate to the scale of development proposed.'</p> <p>Whilst it is acknowledged this LPEID will become an up to date Local Plan, it is in line with the threshold approach as set out in the NPPF of 2500sqm. Policy EI2 sets out the locations in bullet point 1 which would be supporting new</p>	

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											office development which would not require an impact assessment. The areas identified in bullet point 2 are areas as identified as suitable for office development but the scale of office development is limited to ensure there is no detrimental impact on Town Centres and still require a sequential approach. Applications also may need to provide an impact assessment and this is set out in policy. The Council considers this approach to be in accordance with the NPPF as it would be contained in an up to date Local Plan. In terms of the Gas Holder site, this is identified within the site allocations as being suitable for office use and therefore would not need a sequential test or an impact assessment.	
Unknown	Scotia Gas Networks & National Grid	Redundancy of employment premises	Policy EI 7	982	Not Specified	Not specified	Not specified	Not specified		d) Policy EI 7: Redundancy of employment premises  Part (5) of the policy states that:-  "In town centres, local centres, focal points, the Central Activities Zone and employment protection areas, if it has been demonstrated that there is no demand for a premises to continue in B1a office use, a sequential approach to alternative uses will be applied with the preferred	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting employment land is sound and based on a robust and credible evidence base. It is considered that the policy supports the delivery of sufficient community and cultural facilities in accordance with adopted Core Strategy Policy IS6.	

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										<p>alternative uses in the following order:</p> <p>a. Community or cultural facilities;</p> <p>b. An employment-generating use;</p> <p>c. Mixed use, including an employment-generating use and residential use.</p> <p>There is no evidence submitted by the Council to support this sequential approach to alternative development. There is no basis for community or cultural facilities to be delivered before residential uses. There is no evidence to suggest that the need to deliver community or cultural facilities is greater than that for housing. Without such evidence the policy is not sound, and fails Paragraph 182 of the NPPF.</p>		
Unknown	Scotia Gas Networks & National Grid	Hunts Trucks, adjoining sites including Gasholder, Armoury Way, SW18		982	Not Specified	Not specified	Not specified	Not specified	<p>We support the site allocation for mixed use development including residential with some economic uses (Class B1c/B2/B8/SG; Class B1(a); and some smaller Class A3 and Class D use). We also support the site's removal from the Locally Significant Industrial Area allocation, and recognise its new allocation within an Economic Use Intensification Area.</p> <p>We note that the allocation seeks the re-provision of existing industrial (Class B1c/B2/B8/SG) and office use (Class B1(a)) floorspace on site, in addition to a 25% uplift on that existing floorspace.</p>	<p>We consider that the +25% proposal should be conditional on the basis that it is deliverable without fundamentally impacting the spatial strategy, and that it does not unnecessarily impact the viability of the development as a whole.</p> <p>We therefore propose for the following amendment:-</p> <p>"Site Allocation: Mixed use</p>	<p>Comment noted. No change required. Policy E12 requires an increase in economic floorspace. The site allocation sets out the required approach for this intensification which seeks to provide at least a 25% increase in the existing amount of economic floorspace.</p> <p>The flexibility of allowing the residential element into an industrial location is based on the premise that intensification of the land for will take place</p>	

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									<p>We recognise the importance of mixed uses and commercial floorspace, but would urge caution against such a binary allocation of 25%+.</p> <p>Whilst the allocation importantly confirms that “in calculating the floorspace to be replaced, the gas holder itself and the supporting infrastructure should be excluded”, it is unclear whether the replacement floorspace +25% can be accommodated on this site in light of the additional objectives set out by the allocation.</p> <p>These are:-</p> <p>The breaking down of the site into urban blocks.</p> <p>The clustering of economic uses into a distinctive hub of businesses to help minimise potential conflicts with residential uses.</p> <p>Cultural workspace to include yard space which should be public-facing in order to enliven the public realm.</p> <p>Provision for a Wandle riverside walk of at least 6m.</p> <p>Proposed riverside walks and frontage to Armoury Way, Smugglers Way and Swandon Way to be defined by active building frontages.</p> <p>An area of open space provided by the Wandle.</p> <p>Wandsworth gyratory improvements to the south east to complement the planned public realm improvements at the junction of Old York Road, Fairfield Street, Swandon Way and Armoury Way.</p> <p>These objectives must be considered in the context of other Wandsworth Council emerging development management policies (within the</p>	<p>development including residential and economic uses. Redevelopment of the site should provide, where feasible, at least a 25% increase in the amount of industrial (use classes B1c/B2/B8/SG) and office (use class B1a) floorspace, where this will not compromise redevelopment of the Gasholder. The replacement floorspace should include light industrial workspace for cultural SMEs. Part of the site will be required for the realignment of Armoury Way to enable the removal of the Wandsworth gyratory.”</p>	<p>and that existing economic uses are intensified. The allocation recognises that the gasholder site and supporting infrastructure would be excluded from the calculation of floorspace required to be replaced.</p> <p>The gas holder site includes substantial amounts of land that are under-utilised or used temporarily. All requirements including the 25% will be taken into consideration, and viability be assessed as part of the planning application.</p>	

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									<p>Document) which seek the following:-</p> <p>Policy EI5: B1c, B2 and B8 developments should include:- servicing and loading facilities including access bays and service yards; Floor to ceiling heights of 3.35m; Space on site for servicing/parking of commercial vehicles; Goods lifts for multi-storey developments (with a minimum loading of 500kg).</p> <p>Policy EI5: Where feasible, economic uses should be stacked vertically rather than spread across an area.</p> <p>We note that the Document proposes "One new north-south route that will extend the proposed new north-south route from the Hunt Trucks/Gas Holder and adjoining land site, under the railway viaduct, to connect with Smugglers Way. The site affected – Land at the Causeway (EDF Energy Switch House and Head House)". The deliverability of such a route utilising land occupied by the EDF Energy Switch House and Head House is questionable and should be evidenced as being deliverable.</p> <p>Our primary concern is that we are not convinced that a 25% uplift in floorspace is compatible with other collective policy objectives. A clustering of commercial uses, vertically stacked, away from residential uses, with servicing and loading facilities, onsite parking and a cultural yard within the confines of the spatial layout of Figure 7 does not appear achievable when one considers the routes proposed and the 6m offset from the River Wandle.</p>			
Unknown	Royal College of Art	Paragraph	1.57	1454	Not Specified	Not specified	Not specified	Not specified	The emphasis of Focal Point policy is to encourage a wider mix of uses to make the most of the river, with improved urban design to reinforce existing street blocks, introduce public realm enhancements and better pedestrian linkages to the River.		Comments noted. No change required.	

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									<p>Under Paragraph 1.57 of the emerging document 'River Thames and Focal Points of Activity', SME businesses that compliment the mix of uses in the area and bring daytime activity to focal points are encouraged. 'Land-hungry' uses are also identified as presenting opportunities for mixed-use redevelopment at higher densities in order to support the vitality and viability of these areas and improve both the public realm and cultural character of the Focal Points.</p> <p>RCA's proposals include business incubator hubs for specialist SME uses, which would satisfy the sentiment behind this policy. RCA is also supportive of the approach to allow for higher densities within the Focal Points. However, a careful balance needs to be struck on the need (and range and type) for a mix of uses, to avoid the dilution of the specific needs of specialist industries and occupiers such as RCA.</p> <p>The blanket requirement for the inclusion of a prescriptive mix must be avoided in these cases, especially where the overall mix and wider regenerative benefits to LBW more broadly and to London as a whole could be much stronger, as is the case in the RCA expansion. The locational constraints for larger educational and cultural institutions, which have limited spare land and resources to accommodate other uses should also be factored into the approach. The existing businesses within the wider area and specific needs should also be relevant to the overall consideration. In this case, the need for RCA to retain its competitive edge is of paramount importance to its reputation and standing within the world.</p> <p>The current draft polices appear to allow for discretion to be applied. RCA would be against any more stringent wording in future drafts</p>			



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									that could serve to weaken its position and inhibit greater flexibility to further expand its campus should this be desired.			
Unknown	Royal College of Art	Paragraph	1.57	1454	Not Specified	Not specified	Not specified	Not specified	<p>MUFIEA, Thames policy area</p> <p>Changes introduced of relevance to the RCA include the proposed deletion of the Howie Street Mixed Use Former Industrial Employment Area (MUFIEA), and policies relating to the Thames Policy Area.</p> <p>The Ransom's Dock Focal Point of Activity designation and policy provisions remain. RCA note that much of the MUFIEA, Thames Policy Area and Focal Point policy in the current Local Plan overlaps. The revisions proposed appear to be addressing and simplifying the approach by only retaining the Focal Point policy. This approach is supported by the RCA.</p>	However, there could be greater clarity, particularly on mix of uses within the Focal Areas	Comments noted. No change required. Additional detail can be found in the Lombard Road/York Road Focal Point SPD. Policy E13 states that replacement floorspace can include town centre uses. For clarification, town centre uses are defined in the glossary section of the LPEID.	
Unknown	Royal College of Art	Encouraging sustainable economic growth	Policy E1	1454	Not Specified	Not specified	Not specified	Not specified	<p>Proposed new policies include proposals to encourage sustainable economic growth and revisions to requirements for new employment development; protecting employment land and premises; and affordable, flexible and managed workplaces. Of note, the role of large institutions, including universities are acknowledged as playing a significant role in generating local employment and contributing to the broader local economy (Paragraph 1.8). RCA strongly agree with this statement.</p> <p>Policy E1 'Encouraging Sustainable Economic Growth' advocates a balanced approach to protect and encourage growth. It requires:</p> <ul style="list-style-type: none"> <li>• Employment floorspace (defined as B-class uses) to be sought as part of mixed-use developments on sites within Focal Points (Policy E1 bullet 2).</li> <li>• Existing employment premises to be protected where they are well located, form a cluster of employment uses, or contribute to the economic vitality or</li> </ul>	The RCA's comments on mix of uses are stated above. The other points made under policy E1 are generally supported, though RCA does not think that the protection and replacement of all existing employment or B class uses (as advocated in Policies E1, as well as E3 'protected employment land and premises' and E7 'redundancy of employment premises') is appropriate for all sites, particularly in Focal Points where there are emerging clusters of new uses and former industrial B class uses are not always necessarily compatible with (or the best use of) the site and the surrounding uses.	Comments noted. No change required. It is considered that the Employment and Industry Document is sound and based on robust and credible evidence. The Policies E3 and E7 allow for appropriate flexibility in the focal point areas that they allow replacement of commercial floorspace and town centre uses.	

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									<p>viability of the area (Policy E11 bullet 5).</p> <ul style="list-style-type: none"> <li>• Employment floorspace that meets the specific needs of the emerging and growing industries (including creative) are to be encouraged and the economic and place making benefits of the cultural sector will be supported (Policy E11 bullet 6).</li> </ul>			
Unknown	Royal College of Art	Protected employment land and premises	Policy E13	1454	Not Specified	Not specified	Not specified	Not specified	<p>The RCA suggest that more emphasis could generally be placed on the net replacement of alternative 'employment generating uses' or 'commercial floorspace' (which includes D1 education uses) with the balance and range of the replacement use taken into consideration, in appropriate circumstances. This would ensure that large education and cultural employers, such as the RCA are not required to provide or retain B class use (or retail) floorspace where there may be better uses for the land. It would also direct the focus to job creation, rather than the retention of industry and business floorspace, which may not be in as much demand within the local area. This seems to be what Policy E13 later goes on to suggest within Focal Points, though as drafted it is not clear which has greater priority.</p>		<p>Comments noted. No change required. It is considered that Policy E13 is sound and based on robust and credible evidence. Policy E13 (5) requires redevelopment of focal points to replace commercial floorspace whilst ensuring no net loss of office floorspace. The intention of the Focal Point Policy is to present opportunities for mixed-use development at higher densities in order to support the vitality and vibrancy of these areas and improve the public realm and cultural character. This flexible approach allows for employment generating uses or commercial uses. Office floorspace is protected within the focal point areas and this ensures that it provides for some of the demand identified within the borough. London Office Policy Review 2017: this demonstrates a forecast demand for net additional office floorspace (based on office employment projections with allowance for vacancy) for the 2016-41 period of 117,641sqm, with a composite of trend-based and</p>	

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											employment-based office floorspace projections of 117,600sqm.  This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> .	
Unknown	Royal College of Art	Affordable, flexible and managed workplaces	Policy EI 4	1454	Not Specified	Not specified	Not specified	Not specified	The RCA welcome the later acknowledgement under Policies EI4 'affordable, flexible and managed workspaces' and EI5 'requirements for new employment development', of the need for specialist sectors, such as creative and cultural uses, as requiring specialist facilities or premises. It also agrees with the benefits of clustering creative uses to give areas a distinct and recognisable character. It supports the statement made that creative businesses make a significant and valuable contribution to the economy.  It further supports the need for more affordable and flexible workspace for creative uses in the Borough. RCA will be providing business incubator hubs, which will directly address many of the affordable space requirements presented in the emerging policies.		Support welcomed. No changes required.	
Unknown	Berkeley Group Ltd	Hunts Trucks, adjoining sites including Gasholder, Armoury Way, SW18		47415	Not Specified	Not specified	Not specified	Not specified	Site Allocation 41 is located adjacent to established residential areas and is found within close proximity to the town centre. Given this and the sites low employment generating potential, as expressed previously, it is considered that the site is not wholly suitable for employment uses. On this basis we support the re-designation of the site for mixed use development including 'residential and	Although the site designation for a mix of uses, including residential is supported, draft SSAD Site 41 states that 'Redevelopment of the site should provide at least a 25% increase in the amount of industrial (use classes	Comments noted. No change required. The site is a large 2.81 ha site which is currently underutilised in terms of floorspace. The requirements for the site are not considered onerous with regard the open space and site improvements. The site	

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									<p><i>economic uses</i>' which will enable residential led mixed use regeneration.</p> <p>The requirements to deliver a minimum increase of employment floorspace within the proposed designation along with other policy requirements (such as an area of open space, concentration of publicly accessible ground floor uses around the open space, the requirement for part of the south east edge of the site to be used for improvements to the Wandsworth gyratory and the 'cap' on heights to 5 storeys) as well as the presumed abnormal costs associated with development, places a substantial impact on viability, deliverability and regeneration of the site.</p>	<p>B1c/B2/B8/SG) and office (use class B1a) floorspace'. The requirement for at least 25% increase is not supported and an objection is raised.</p> <p>A suggested amendment would be to include text within the policy wording (taken forward via a minor modification) stating that the 25% increased provision is subject to viability. If such an approach was taken forward, the current objection to the policy could be withdrawn. On this basis, we welcome further discussion on this matter with the Council.</p> <p>The requirement to provide increased quantities of employment floorspace/set requirement does not take into consideration that different employment uses have differing employment densities and that the needs of businesses in terms of floorspace are constantly changing. For example, recent research suggests that office employment densities are increasing in London due to factors such as cost saving, hot-desking and other flexible working practices. Modern premises are generally more space efficient than the ones they replace and therefore are able to employ more</p>	<p>allocation document purpose is to set out sites where development is anticipated in the borough, this document is the appropriate location for setting out the quantum and detail which then allows the requirements to be taken on board at the beginning of development, and allows for negotiations if any unforeseen circumstances occur to preclude development on site.</p>	

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										<p>people. It is therefore considered that a more flexible approach should be taken.</p> <p>It is considered that further detail such as quantum should be set out in a SPD as guidance and should not be contained within a Development Plan policy to allow for flexibility of the Plan itself. Again, we welcome further discussion on this matter with the Council.</p>		
Unknown	Berkeley Group Ltd	Hunts Trucks, adjoining sites including Gasholder, Armoury Way, SW18		47415	Not Specified	Not specified	Not specified	Not specified	<p>Design:</p> <p>The recent Housing White Paper (2017) makes it clear that great weight should be attached to the value of using suitable brownfield land in an efficient manner for the delivery of new homes, in doing so, Local Authorities should take a flexible approach in adopting and applying policy that could inhibit these objectives in particular circumstances; this could include a rigid application of design principles. Again, as stated in previous responses to the draft Plan, it is considered that further detail such as design should be set out in a SPD as guidance and should not be contained within a Development Plan policy.</p>	<p>The delivery of regeneration projects and high quality homes entails significant risks, including the physical challenges of demolition, remediation and construction, cost inflation and other external factors such as the wider economy and local issues (such as increased competition). Such risks are further exasperated on brownfield, contaminated sites where abnormal costs can be substantial.</p> <p>The requirements to deliver a minimum increase of employment floorspace within the proposed designation along with other policy requirements (such as an area of open space, concentration of publicly accessible ground</p>	<p>Comments noted. No change required. The site allocation document purpose is to set out sites where development is anticipated in the borough, this document is the appropriate location for setting out the quantum and detail which then allows the requirements to be taken on board at the beginning and allows for negotiations if any unforeseen circumstances occur to preclude development on site.</p>	

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										floor uses around the open space, the requirement for part of the south east edge of the site to be used for improvements to the Wandsworth gyratory and the 'cap' on heights to 5 storeys) as well as the presumed abnormal costs associated with development, places a substantial impact on viability, deliverability and regeneration of the site.		
Unknown	National Grid	Local Plan - Employment and Industry Document - proposed submission version - March 2017		220037	Not specified	Not specified	Not specified	Yes	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.		Comments noted. No change required.	
Unknown	TR Property Investment Trust PLC	Site allocations	4	224282	Not Specified	Not specified	Not specified	Not specified	<p>Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW Our client welcomes the replacement of the MUFIEA with the new EUIA designation. In previous rounds of consultation, the EUIA was referred to as an Employment Intensification Area (EIA) and we stated that it appeared to be much the same as MUFIEA in that it sought to increase the density of existing uses whilst providing complimentary commercial, employment and community uses.</p> <p>Therefore, our client is pleased to see that the MUFIEA designation has been superseded instead of running alongside the new designation. Our client's site is well-suited to the EUIA designation as it currently forms part of an industrial area, which through intensification and consolidation of the</p>		Comments noted. It is considered that the site allocation designation at Ferrier Street is sound and based on robust and credible evidence. The intention of the site allocation is to reprovide the existing floorspace and the 25% increase is to be based on the existing floorspace use. It is considered that a minor amendment be added to clarify this point.	Add wording after second sentence of 'Site Allocation' to read:  'Redevelopment of the site should provide at least a 25% increase in the <u>existing</u> amount of industrial (use classes B1c/B2/B8/SG) and office (use class B1a) floorspace.

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									<p>economic uses has capacity to provide an overall increase in industrial and SME floorspace as well as contributing to public realm uses around Wandsworth Town railway station. There is also potential for residential use toward the eastern end of the site.</p> <p>The wording of this allocation is slightly ambiguous; it is unclear whether the amount of industrial and office floorspace will evenly increase by 25% each or whether the amount of combined industrial and office floorspace must increase by 25% overall but can be unevenly split between the two uses. Our client considers clarification on this point, possibly through use of several worked examples would be beneficial.</p> <p>Several Design principles have been outlined in the site allocation which is generally supported, However our client would highlight that the aspiration for ' <i>The installation of a new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/Gas Holder site</i>' would be subject to the agreement of various landowners around the site and is not within our client's sole control. The re-designation of the Ferrier Street estate as an Economic Use Intensification Area will also enable the provision of modern, flexible floorspace for food and drink manufacturing and distribution uses, alongside other economic uses.</p> <p>The Ferrier Street industrial area provides floorspace for a number of SMEs that serve the cultural and other functions of the Central Activities Zone as well as a concentration of food and drink-related businesses.</p>			
Unknown	Battersea Project Land Company Limited (BPLCL)	Paragraph	2.16	720015	Not Specified	Not specified	Not specified	Not specified	The proposed alternative to managed workspace provision, affordable workspace, set out in paragraph 2.16, also presents a significant burden on employment schemes. Providing 10% of gross floorspace at a	We understand the need for managed and affordable workspace and the benefits they can bring to Wandsworth's economy.	Comments noted. No change required. As highlighted within the representation there is a need for managed and affordable workspace within	

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									discounted rent of 80% market rates presents a significant disincentive to office development, and starts to dictate how employment space can be designed and let. In mixed-use schemes where viability appraisals are required, the subsidy required by this requirement would need to be taken account of, and reduce the subsidy available for affordable housing accordingly. In purely commercial schemes where there is no ability to provide a viability assessment, this requirement risks taking no account of market conditions or scheme viability considerations, including site development costs. Consequently, we object to this prescriptive approach.	However, forcing provision in all development schemes above a certain size is not the solution. A better alternative could be to seek contributions (either financial or in-kind) from developers to a pooled or borough-wide initiative, so that workspace is provided in a manner where its benefits can be fully realised without negative impacts on other employment space. We would be happy to discuss this option further with the Council. We question the merits of inserting ever more restrictions and requirements into the planning system - whilst going back to 'land use and appearance' would be unrealistic, we would encourage the Council to simplify the planning policies as opposed to bringing in further burdens on development.	the borough. Policy E14 is considered to be appropriate and takes into account pressures by developers, it allows an option of either providing managed workspace or if this is not achievable then it would require a proportion of office floorspace at an affordable rent. As with all planning obligations officers will have to take viability into consideration. At present, managed affordable workspace is being provided by developers and if this is an upfront cost that is factored in to the viability assessment there are no obvious barriers to excluding this requirement. Regarding the suggestion of pooling commuted sums, it is considered that such workspace would be considered as infrastructure and therefore should be delivered through CIL and not through S106 as the CIL regulations restrict the use of pooling arrangements for infrastructure projects.	
Unknown	Battersea Project Land Company Limited (BPLCL)	Paragraph	2.21	720015	Not Specified	Not specified	Not specified	Not specified	The Submission Version contains policy E14 in relation to affordable, flexible and managed workplaces. Whilst we support certain elements of the document, including the support provided to an emerging 'digital hub' at Battersea Power Station provided at paragraph 2.21, we would be concerned if policy E14 was to be applied to developments such as the Battersea Power Station masterplan.  The proposed policy includes prescriptive	If the Local Plan is to seek a requirement to provide an element of managed workspace, there would need to be no additional obligations on the management or affordability of these spaces, so as to allow the operator sufficient commercial flexibility. The	Comments noted. No changes required. Whilst policy E14 aims to achieve more flexible managed or affordable workspace it also aims to be flexible enough to ensure that applicants can meet the criteria. There has been a growth in the managed workspace sector which has demonstrated that there is	



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									<p>requirements for large-scale development which includes economic uses to provide elements of affordable, flexible or managed workspace.</p> <p>Paragraph 2.14 advises specifically that the expectation on large schemes will be for a significant element, of at least 400sq m up to 10% of gross economic floors pace on schemes of more than 4,000sq m.</p> <p>We question why this is targeted at large-scale schemes, when it is smaller schemes that are likely to be most appropriate for this type of workspace, and when large-scale offices should be encouraged and supported for their major economic benefits. The Battersea Power Station masterplan provides approx. 150,000sq m of B1 office floorspace. Providing 15,000sq m of this as affordable, flexible or managed workspace would represent a significant financial burden that would have a major impact on the commercial viability of that office element.</p> <p>It is too onerous, will serve to disincentivise the delivery of offices, and does not take into account different sizes and types of schemes. As such we strongly object to the introduction of this 10% requirement. Whilst there is undoubtedly a need for managed workspace as a component of a wider commercial offer, this should take account of demand for this and other types of commercial floorspace, including the need to attract more traditional office tenants in locations such as Battersea Power Station, where a new town centre and CAZ Frontage is being established. Here, large-scale office use is an important component to achieving the mix and scale of economic activities which are required by policy.</p>	<p>suggestion that an operator should be identified and secured at application stage is unrealistic, and reflects an attempt by the Council to go beyond the remit of planning to dictate commercial freedom.</p> <p>This would immediately stop the provision of any speculative office development, which is an unacceptable impact and contrary to the objectives of Wandsworth's Local Plan.</p>	<p>strong demand from SMEs which needs to be accommodated within the borough. In relation to asking that an operator should be identified and secured at application stage this to ensure the Council has certainty in deliverability of managed workspace. As is standard practice for major developments, a site specific viability assessment would be considered upon application and this would be taken into account when assessing the overall quantum of managed or affordable workspace.</p>	
Unknown	Callington Estates Ltd & the	Encouraging sustainable economic	Policy EI 1	768910	Yes	No	Not	No	We agree with this policy approach of specifying where different employment uses are best located, in particular that the LSIA's are		Comments noted. No change required. It is considered that the approach set out in the	

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	Callington Trust	growth							suitable for industry and waste. Office use is not considered appropriate to the LSIA and as such the continued inclusion of our client's site within the Lydden Road LSIA is in conflict with the objectives and locational focus set out in Policy EI1.		LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. It is acknowledged that although the LSIA's do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the areas, and instead bolster the employment generating potential of these areas, providing more varied local job opportunities.	
Unknown	Callington Estates Ltd & the Callington Trust	Protected employment land and premises	Policy EI 3	768910	Yes	No	No	No	<p>The site is located on the very periphery of the Lydden Road LSIA and forms an unconventional and illogical boundary (please see Figure 2) to the LSIA. Moreover, the site, with a total floor area of 638m<sup>2</sup>, makes up a very small percentage (1.7%) of the Lydden Road LSIA.</p> <p>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 Lydden Road 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 Road 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</p>	In summary, these representations to the Employment and Industry Document Proposed Submission Version March 2017 seek to remove our clients' site from the designated Lydden Road LSIA. The site is neither suitable in policy terms or practical in site specific terms for continued designation as part of the LSIA.	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that	

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											<p>where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-</a></p>	

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											<p><a href="#">base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to redesignation and intensification in accordance with this evidence.</p> <p>The Lydden Road LSIA designation was adopted through the Local Plan 2016, further evidence from consultants AECOM which helped form the LPEID highlighted that part of this site could be removed from the LSIA. The Mecca Bingo site has therefore been removed from the designation and given a site allocation designation but required a 25% uplift on employment uses if a mixed use scheme was proposed. No further amendments are proposed to this LSIA which requires to be protected for industrial use. As detailed in the background text to policy E16 LSIA's are not appropriate locations for any sort of residential use. The LSIA's serve an important function to provide land which will be the main focus for industry.</p>	
Unknown	Callington Estates Ltd & the Callington Trust	Protected employment land and premises	Policy E13	768910	Yes	No	No	No	Policy E13 is relevant to protected employment land and premises. It confirms that a strategic reservoir of industrial land will be retained and this includes the five designated LSIA's, including Lydden Road. The policy confirms that appropriate uses within the LSIA's include industry, logistics, storage, warehousing and	Sites such as 53 Lydden Grove, London, SW18, should not be included within LSIA's if they do not lend themselves favourably to the use requirements (Classes B1(c), B2 or B8) of	Comments noted. No change required. As mentioned within the representation LSIA's are strategically important to ensure that the council has the means to protect employment land uses. It is considered that	

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									<p>waste management. Office use is not identified as appropriate in LSIA's.</p> <p>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 thought 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</p> <p>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 thought 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</p>	<p>such employment areas as set out in Policy EI3. The Council has already set out proposed amendments to the proposals map designation for Lydden Road LSIA to re-designate the Bingo Hall site. On the basis that our client's site does not fulfil the LSIA policy requirement, the proposals map should be amended to delete 53 Lydden Grove from the LSIA. As the site is on the edge of the LSIA designation and appears as an illogical 'nib' or extension to it, removal of the site from the Lydden Road</p> <p>LSIA could be easily achieved without any effect on the rest of the designation.</p>	<p>the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this</p>	

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									<p>appropriate to the LSIA and satisfies the policy context of LSIA's.</p> <p>Sites such as 53 Lydden Grove, London, SW18, should not be included within LSIA's if they do not lend themselves favourably to the use requirements (Classes B1(c), B2 or B8) of such employment areas as set out in Policy EI3. The Council has already set out proposed amendments to the proposals map designation for Lydden Road LSIA to re-designate the Bingo Hall site. On the basis that our client's site does not fulfil the LSIA policy requirement, the proposals map should be amended to delete 53 Lydden Grove from the LSIA. As the site is on the edge of the LSIA designation and appears as an illogical 'nib' or extension to it, removal of the site from the Lydden Road.</p> <p>LSIA could be easily achieved without any effect on the rest of the designation.</p>		<p>approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to redesignation and intensification in accordance with this evidence.</p> <p>In relation to the segregation of the Bingo Hall and Riverside studios area and why this has been removed from the LSIA this has arisen from the ELPS evidence which states;</p> <p>'Cluster C6 similarly comprises</p>	

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											<p>medium and large sized warehouses along Bendon Valley and Lydden Road, and small office units, studios, and some small light industrial space within the Riverside Business Centre.</p> <p>.....Premises within all three clusters appear to be well used and have been adapted to be fit for purpose, with few vacancies. The 'Flip Out' trampoline park on Bendon Valley (formerly Mecca Bingo) could provide an opportunity for intensification and redevelopment, and includes a large car park..'</p> <p>The emerging policy allows for the southern part of the LSIA area to be mixed use but this is on the basis that there will be an intensification of use of industrial and office floorspace by at least 25%.</p> <p>As detailed in the background text to policy E16 LSIA's are not appropriate locations for any sort of residential use. The LSIA's serve an important function to provide land which will be the main focus for industry.</p>	
Unknown	Callington Estates Ltd & the Callington Trust	Managing land for industry and distribution	Policy E16	768910	Yes	No	No	No	We are instructed by our joint clients, Callington Estates Limited and The Callington Trust, to submit the enclosed representations in respect of the Employment and Industry Document Proposed Submission Version March 2017. We also submit representations to the corresponding proposals map changes set out in the Policies Map Changes Document	Draft Policy E16 sets out the requirements to manage land for industry and distribution. In line with draft Policies E11 and E13, it confirms in criterion 1) the policy that B1 c, B2 and B8 uses will be supported in LSIA's, along with	Comment noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The LSIA's serve an important function to provide	

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									<p>Employment and Industry Review March 2017.</p> <p>Accordingly, please find enclosed the required representation form. Our clients' land interest is the property known as 53 Lydden Grove, London, SW18. They are the freeholders of the site. Previous representations were submitted in November 2016 to the Policy Options Consultation for the Employment and Industry Local Plan document.</p> <p>(a) The Site</p> <p>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 638m<sup>2</sup>. The building is divided into two units (Unit 1 – 395m<sup>2</sup> and Unit 2 – 243m<sup>2</sup>), both of which are occupied as offices within the Use Class B1(a). The occupation of the two units is:-</p> <p>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.</p> <p>(b) Planning History</p> <p>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 25<sup>th</sup> 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</p>	<p>appropriate sui generis uses that relate to the industrial nature of the area. Once again office use is not considered appropriate in the LSIA's. Retaining our clients' site within the LSIA designation would mean that any future redevelopment of the site for office purposes would actually be in conflict with Policy EI8, despite the fact that it is an existing permitted office use.</p>	<p>land which main focus is for industry for the lifetime of the plan. It is acknowledged that although the LSIA's do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the areas, and instead bolster the employment generating potential of these areas, provide more varied local job opportunities</p> <p>The possible encroachment of residential uses into these industrial areas can harm their operation and limit their capacity and it is therefore crucial to protect the LSIA from non-economic uses. As a whole the LSIA's form the strategic reservoir of land that can be used primarily for industrial purposes.</p>	



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									<p>approved on the 16<sup>th</sup> 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 6<sup>th</sup> 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.</p> <p>A planning application (ref. 2016/6999) was recently submitted in November 2016 for refurbishment works including external alterations together with the erection of a first floor extension for Class B1 purposes. The existing buildings are dated and the purpose of this application is to refurbish and upgrade the building to provide modern flexible business floorspace that will be more attractive to occupiers. A delegated officer's decision is expected shortly.</p> <p>The Employment and Industry Document will form part of the Local Plan for Wandsworth and will replace existing employment related policies and designations within the adopted Core Strategy, Development Management Policies Document and Site Specific Allocations Document. It is important as part of this Local Plan update, that existing employment sites and uses are comprehensively reviewed and updated where appropriate to ensure they are designated in accordance with their current use and future development context. Accordingly these representations seek the removal of the site from the designated Lydden Road LSIA as its existing use for Class B1 (a) office purposes is not an appropriate use in accordance with LSIA policy. The following sections of this letter explain in detail why the site can, and should be removed from the LSIA, having regard to the site specific considerations and the policy</p>			

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									<p>context.</p> <p>(i) Site Specific Considerations</p> <p>The site is located on the very periphery of the Lydden Road LSIA and forms an unconventional and illogical boundary (please see Figure 2) to the LSIA. Moreover, the site, with a total floor area of 638m<sup>2</sup>, makes up a very small percentage (1.7%) of the Lydden Road LSIA.</p> <p>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 Lydden Road 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 Road 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.</p> <p>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 Road at the southern limit of our clients' site. This is again indicative of the inappropriateness of this site for continued allocation within the LSIA.</p>			

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									<p>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.</p> <p>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 Lydden Grove/Bendon Valley LSIA, adjacent residential properties and is inappropriate for designated LSIA uses. Accordingly having regard to the site specific context, Map 53 (policies map ref 66) Lydden Road (formerly Bendon Valley) LSIA as set out in the Policies Map Changes Document Employment and Industry Review March 2017 should be amended to delete the property from the Lydden road LSIA designation.</p> <p>Draft Policy EI6 sets out the requirements to manage land for industry and distribution. In line with draft Policies EI1 and EI3, it confirms in criterion 1) the policy that B1 c, B2 and B8 uses will be supported in LSIA's, along with appropriate sui generis uses that relate to the industrial nature of the area. Once again office use is not considered appropriate in the LSIA's. Retaining our clients' site within the LSIA designation would mean that any future redevelopment of the site for office purposes would actually be in conflict with Policy EI8, despite the fact that it is an existing permitted office use. Draft Policy EI6 criterion 4) explains that office and/or research and development uses will only be acceptable where they are 'ancillary to the use of a site for one or more of the industrial uses identified in section 1 above' Our clients' site benefits from lawful use for office purposes and that is its current use. It is</p>			

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									<p>not ancillary to another industrial use or site and therefore is inappropriate for inclusion in the LSIA.</p> <p>In summary, these representations to the Employment and Industry Document Proposed Submission Version March 2017 seek to remove our clients' site from the designated Lydden Road LSIA. The site is neither suitable in policy terms or practical in site specific terms for continued designation as part of the LSIA.</p>			
Unknown	Callington Estates Ltd & the Callington Trust	Site allocations	4	768910	Yes	No	No	No	<p>It is important as part of this Local Plan update, that existing employment sites and uses are comprehensively reviewed and updated where appropriate to ensure they are designated in accordance with their current use and future development context. Accordingly these representations seek the removal of the site from the designated Lydden Road LSIA as its existing use for Class B1 (a) office purposes is not an appropriate use in accordance with LSIA policy.</p> <p>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 Lydden Road 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 Road 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.</p> <p>The residential roads serving the site are wholly inappropriate for commercial deliveries to the</p>		<p>Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. It is acknowledged that although the LSIA's do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the areas, and instead bolster the employment generating potential of these areas, providing more varied local job opportunities.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to</p>	

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									site and will inevitably result in conflict with the amenities of nearby residents.		protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release	

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											of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.	
Unknown	Amec Staff Pensions Trustee Limited	Locations for new employment floorspace	Policy EI 2	929707	No	Yes	Yes	Yes	In summary, we support the Local Plan: Employment and Industry Document and 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.	It is recognised that there are restrictions in the forthcoming policies on the quantum of town centre uses. As part of the evidence base of information gathered for the LPEID there has been no assessment of retail provision within town centres, most importantly the impact of the provision of retail uses on this site could have on the town	Comments noted. No change required. Support noted in regards to the LPEID, and allowing mixed use schemes within the Lombard Road/York Road area. The site is located in a focal point of activity which states that replacement floorspace can include town centre uses in accordance with policy DMO8. The policy DMO8 limits the size of retail to 300sqms A1 floorspace to ensure that the promotion of	

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										<p>centre.</p> <p>We would advise that provision of retail use on site should be led by an evidenced based approach and be on a case by case basis with the applicant being required to demonstrate the impact of the proposed uses on the viability and vitality of the town centre according with national policy. Local Policy encourages a mix of uses within the Town Centre and the restriction of uses on sites should be led by an evidence based approach as this could restrict the potential of a site coming forward for redevelopment. Additionally, such a restriction in use fails to see the potential future benefits a particular use may have on the town centre in the absence of any evidence.</p>	<p>the focal points of activity is not to the detriment of existing town centres, conditions may be used to ensure an appropriate scale and mix of uses is provided. The council commissioned a Retail Needs Assessment with an update in 2012 which identified current and future need for retail development and identified where future growth should be accommodated this evidence base was used as information for Core Strategy policy PL8.</p>	
Unknown	Travis Perkins (Properties) Ltd	Encouraging sustainable economic growth	Policy E1 1	952643	No	No	Yes	No	<p>Whilst the Draft DPD is positively written overall and clearly seeks to protect employment uses in the borough, there are areas of ambiguity and inconsistency. The draft overarching Policy E1 1 states at part 4:</p> <p>"Existing employment premises will be protected where they are well located, form a cluster of employment uses, or contribute to the economic vitality and viability of the area. Policies E13 and E17 set out how this will be achieved"</p> <p>This indicates that employment uses will only be protected only if they are in a cluster of employment uses or, as set out in policy E13,</p>	<p>The wording of this section should read therefore:</p> <p>Part 4 -</p> <p>"existing employment premises will be protected where they are well located, form a cluster of employment uses, or contribute to the economic vitality and viability of the area. Policies E13 for sites within protected employment areas and Policies E15 (Part 4) and E17</p>	<p>Comments noted. No change required. The Council considers that the wording of Policy E11 (4) is clear. Policy E11(4) is a strategic Policy which states the Council's intention to protect existing employment premises as set out in Policy E1 3. Policy E13 sets out where the protection of employment premises would be considered. Additionally, the existing approach is considered to be sound in applying E15 (4) which allows for consideration of the retention of existing</p>	

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									<p>that existing employment premises will only be protected in the specific industrial locations listed within policy EI 3. Replacement floorspace can include town centre uses (with A1 floorspace limited to 300 sq ms cumulatively across the focal point, in accordance with policy DMO8)"</p> <p>The suggested wording will require developers to first try to retain existing businesses on similar terms to the existing leases following redevelopment and, if the existing business does not wish to remain, then Core Strategy Policy PL9 should be complied with.</p>	for all other employment premises set out how this will be achieved"	businesses on site where possible for all new employment development.	
Unknown	Travis Perkins (Properties) Ltd	Protected employment land and premises	Policy EI 3	952643	No	Not specified	Yes	Not specified	<p>c) Policy EI3 (Protected Employment Land and Premises)</p> <p>Whilst the Draft DPD is positively written overall and clearly seeks to protect employment uses in the borough, there are areas of ambiguity and inconsistency.</p> <p>This indicates that employment uses will only be protected only if they are in a cluster of employment uses or, as set out in policy EI3, that existing employment premises will only be protected in the specific industrial locations listed within policy EI 3. Replacement floorspace can include town centre uses (with A1 floorspace limited to 300 sq ms cumulatively across the focal point, in accordance with policy DMO8)"</p> <p>Finally, the wording of Policy EI3 is not consistent with Policy EI5 or Policy EI7 which both seek to ensure that existing employment uses remain within the B Classes or similar sui generis uses.</p>	<p>To overcome this the following amends should be made to draft policy EI3, part 5:</p> <p>"Mixed use development including residential is appropriate within Focal Points of Activity. In these areas, redevelopment of sites currently or most recently in industrial use must replace all commercial floorspace on the site, first in accordance with the requirements set out in Policy EI5 and if these requirements are met then Core Strategy policy PL9 which encourages a wider mix of uses at focal points of activity located along the riverside.</p>	<p>Comments noted. No change required. The intention of the Focal Point Policy set out in EI3 (5) is to present opportunities for mixed-use development at higher densities in order to support the vitality and vibrancy of these areas and improve both the public realm and cultural character. There remain some sites in focal points which have an industrial or other low density use which provide opportunities to for mixed use redevelopment. Employment floorspace is sought in Focal Points in accordance with Core Strategy Policy PL9 and DMPD Policy DMO8 and town centre uses are considered appropriate within this area. The proposed wording amendments are not considered necessary for any clarification. Policies within the LPEID can be applied where required and there is no reason to cross reference within EI3 in this instance.</p>	



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Unknown	Travis Perkins (Properties) Ltd	Requirements for new employment development	Policy EI 5	952643	No	Not specified	Yes	Not specified	<p>Policy EI5, part 4 states:</p> <p>"Redevelopment of existing economic uses should wherever possible seek to retain existing businesses on site following development, with similar lease terms and rent levels, if those businesses wish to remain. Where possible, phasing of development should be planned in order to minimise the need for existing businesses to relocate, both during and after construction"</p> <p>Travis Perkins supports this policy wording which seeks to provide protection for existing businesses on economic sites and this policy should be given considerable weight when considering planning applications for redevelopment of existing economic sites throughout the borough.</p> <p>However, this policy conflicts with the current wording of draft policy EI3 which does not provide sufficient protection for existing economic uses within Focal Points.</p>		Comments noted. No change required. Policy EI3 (5) supports town centre uses and employment floorspace in the form of offices in Focal Points of Activity. The intension of EI3 (5) is to present opportunities for mixed-use development at higher densities in order to support the vitality and vibrancy of these areas and improve both the public realm and cultural character. There remain some sites in focal points which have an industrial or other low density use which provide opportunities to for mixed use redevelopment. Redevelopment of the existing building merchant SG use would be faced with very difficult urban design challenges and would be unlikely to meet the urban design objectives of the adopted Site Specific Allocations Document (site 10.12). If it could be demonstrated in a planning application that the existing use could be incorporated as part of a mixed use development to the Councils satisfaction then such redevelopment may be justified.	
Unknown	Travis Perkins (Properties) Ltd	Redundancy of employment premises	Policy EI 7	952643	No	Not specified	Yes	Not specified	<p>e) Draft Policy EI 7 (Redundancy of Employment Premises)</p> <p>The supporting text of draft policy EI7 at paragraph 2.34 states:</p> <p>"When marketing a premises that is currently occupied, evidence must be supplied to demonstrate that the current occupant intends</p>	In order to avoid ambiguity, paragraph 2.34 must be included as a fourth requirement within the text of policy EI7 and not just used as a background or supporting paragraph.	Comment noted. No change required. It is considered that this text is more appropriately located in the supporting text to Policy EI7 as the main thrust of the policy is concerning the need for marketing evidence to demonstrate there is no longer a need or demand for the	

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									<p>to vacate the premises and to show how and when the premises would be made available for potential occupants"</p> <p>However, this is supporting text only and was not included within the actual policy text which largely focusses on the requirement for 18 months marketing to be submitted prior to losing an economic use. In order to avoid ambiguity, paragraph 2.34 must be included as a fourth requirement within the text of policy E17 and not just used as a background or supporting paragraph.</p> <p>This would help to ensure that existing long term leaseholders, such as the TP sites on Lombard Road, Battersea will not unwillingly be evicted from their successful business premises. As mentioned, builders' merchants provide an essential service and should be protected.</p>		premises.	
Unknown	Travis Perkins (Properties) Ltd	Glossary	5	952643	No	Not specified	Yes	Not specified	<p>b) Definition of Employment Land</p> <p>The Glossary of the draft DPD provides four separate definitions of employment use, which could lead to ambiguity within the policies. The Glossary defines economic and employment uses as :</p> <p>"B1a (office), B1b (research and development), B1c (light industry), B2 (general industry), B8 (storage and distribution), appropriate sui generis uses including transport depots, waste processing sites, vehicle sales showrooms, builders' yards and merchants, and other sui generis uses that have an industrial character".</p> <p>Whilst the definition of industrial uses is:</p> <p>"B1c, B2 and B8 uses as well as sui generis uses that are industrial in nature, such as builders' yards, car sales showrooms, waste transfer stations or bus depots"</p>	<p>This definition inconsistent with the three previous definitions of employment and economic uses and in order to avoid ambiguity throughout the DPD should state:</p> <p>"any employment-generating activity including A1-A5, B1, B2, B8, D1 and D2 uses and those uses set out in the definition of economic and employment uses"</p> <p>This will ensure that existing viable employment generating and industrial uses are not lost to retail development without justification.</p>	<p>Comment noted. No changes required. It is considered that the glossary is sound and based on robust and credible evidence.</p> <p>It is considered that the glossary defines commercial floorspace sufficiently as it refers to employment generating uses, which is any use which involves an element of employment. Therefore, this would incorporate the SG uses that have been proposed to be added by the representation.</p>	

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									<p>Travis Perkins welcomes the recognition given to the important role that builders' merchants have in the borough and supports this definition of employment and industrial uses within the Glossary.</p> <p>Travis Perkins also supports the definition of employment-generating uses as:</p> <p>"any use which involves an element of employment"</p> <p>This definition of employment generating uses acknowledges that there are many uses in the borough that do not fall within Class B of the Use Classes Order but are invaluable to the creation of local jobs, such as builders' merchants.</p> <p>Finally the definition of commercial uses is:</p> <p>"any employment-generating activity including A1-A5, B1, B2, B8, D1 and D2 uses"</p> <p>This definition inconsistent with the three previous definitions of employment and economic uses and in order to avoid ambiguity throughout the DPD should state:</p> <p>"any employment-generating activity including A1-A5, B1, B2, B8, D1 and D2 uses and those uses set out in the definition of economic and employment uses"</p> <p>This will ensure that existing viable employment generating and industrial uses are not lost to retail development without justification.</p>			
Unknown	Schroders Real Estate Investment Management	Locations for new employment floorspace	Policy EI 2	994433	Not Specified	Not specified	Not specified	Not specified	<p>Policy EI 2 'Locations for new employment floorspace'</p> <p>Part 5 of Policy EI 2</p> <p>Schroders acknowledges the recognition given</p>	In this context it requests the Council to amend the wording of this part of Policy EI 2 to allow the economic potential for these types of industries in	Comments noted. No change required. Policy EI2 sets out that IBPs are suitable for the provision of SMEs. The intention of the policy is to ensure that sites which may be	

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									to the economic growth and intensification of existing uses within the IBP areas. However, it considers that the Council should adopt a more flexible approach to improving the IBP's role as a buffer zone to facilitate economic growth in the borough. In particular, Schrodgers objects to the requirement of Policy EI 2 (part 5) for redevelopment proposals to provide industrial uses on the ground floor: It considers that this requirement is inconsistent with paragraph 2.6 of Employment Land Review which supports provision of business floorspace for SMEs and a wide range of cultural industries.	the IBPs	redeveloped for office use retain a significant industrial function and intensify the industrial offer. This is in alignment with the London Plan which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses.  It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations,	

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											<p>intensification to include higher density employment uses (e.g B1a/b) through designation of an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this</p>	

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											evidence.	
Unknown	Schroders Real Estate Investment Management	Protected employment land and premises	Policy EI 3	994433	Not specified	Not specified	Not specified	Not specified	<p>Policy EI 3 'Protected employment land and premises'</p> <p>Part 2 of Policy EI 3 refers to the IBPs and states that:</p> <p>"The northern and western edges of the Queenstown Road, Battersea SIL will be promoted for Industrial Business Park (IBP) uses, as set out in policy EI6."</p> <p>Part 3 of Policy EI 3 refers to employment protection areas which are classified as premises that provide economic floorspace. This part of the Policy states that:</p> <p>"Redevelopment proposals in employment protection areas for mixed use including residential will be permitted if the development would result in no net loss of the existing office and industrial floorspace, and if the mix of uses can be successfully achieved on site in accordance with policy EI 5."</p> <p>Schroders is supportive of the flexibility of the latter part of the Policy and suggests that it would be appropriate for the Policy to treat IBPs in the same way. This approach would recognise the role of IBPs as buffers zones between residential uses and heavy industrial uses in SIL supporting the demand for uses that require higher quality environments. Schroders is aware of the Council's response to its comments submitted as part the options consultation. In its response the Council noted that allowing residential uses into the SIL would be inappropriate, stating that:</p> <p>"There remains strong demand for industrial uses in the borough, and the borough is identified in the London Plan as a restricted</p>		Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of and Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is	

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									<p>transfer borough for protected industrial land. The SIL is also identified in the London Plan as being of strategic importance to London as a whole. Allowing residential uses in any part of the SIL would result in the piecemeal loss of industrial sites and compromise the flexibility of remaining sites to provide land for a broad range of industrial, transport, waste and other crucial uses." (Local Plan: Employment and Industry - Policy Options Consultation Report; March 2017).</p> <p>Schroders recognises the Council's approach to protecting the existing industrial land within SIL but suggests that the role and characteristics of IBPs justify a similar approach to protected employment land, whereby any proposals for a mix of uses (including new residential uses) in the IBP would need to meet the criteria set out by part 3 of Policy EI 3. This is to ensure any development in the IBP would not result in net loss of office and industrial floorspace and would be compliant with the design standards set out by Policy EI 5.</p>		<p>considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>	
Unknown	Schroders Real Estate Investment Management	Affordable, flexible and managed workplaces	Policy EI 4	994433	Not Specified	Not specified	Not specified	Not specified	<p>Policy EI 4 'Affordable, flexible and managed workplaces'</p> <p>Schroders supports the intention of Policy EI 4 and recognises the benefits of affordable, flexible and managed workplaces could generate across the borough, which is</p>	<p>Policy EI4</p> <p>On this basis, Schroders requests that Policy EI 4 should be amended to provide more clarity on this matter. This is to ensure</p>	<p>Comments noted. No changes required.</p> <p>Part 2</p> <p>The council considers that a flexible approach to securing</p>	

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									<p>consistent with the way that it lets space at Battersea Studios.</p> <p>As stated in its previous representations, Schroders considers that some forms of managed workspace could be treated as affordable workspace, but the Council should not expect that all managed workspace would be treated in this way. In response to our representations, the Council agreed that managed workspace was not necessarily affordable in all instances and considered it appropriate to set out and require a range of affordability criteria in the Local Plan Policy.</p> <p>On this basis, Schroders requests that Policy EI 4 should be amended to provide more clarity on this matter. This is to ensure that the requirement for provision of managed workspace could address demand, cost and location, and the impact on development viability.</p> <p>Part 2 of Policy EI 4 states:</p> <p>"Development proposals for affordable, flexible and managed workspace will be encouraged in order to meet the specific needs of SMEs in the local economy including those in emerging and specialist sectors where the borough demonstrates - or could develop - local specialisation. All development that provides economic floorspace will be expected to contribute to the provision of affordable, flexible and/or managed workspace."</p> <p>Schroders supports the principle of this part of the Policy but suggests that the requirement to provide this type of floorspace should be based on the viability of individual schemes and the demand for such accommodation, rather than expecting it in all developments providing 'economic floorspace'. For this reason, Schroders requests this Policy to be applied</p>	<p>that the requirement for provision of managed workspace could address demand, cost and location, and the impact on development viability.</p> <p>Part 2</p> <p>For this reason, Schroders requests this Policy to be applied flexibly to ensure the delivery of new developments across the borough.</p> <p>Part 3</p> <p>Given that the Council did not provide their response to this specific matter, Schroders requests it to be considered during the proposed submission version consultation. In this context, it strongly encourages the Council to assess the requirement for the provision of this type of floorspace on a case by case basis, subject to demand and viability of development proposals.</p>	<p>affordable workspace is proposed in Policy EI4. In terms of the locations where cultural workspace is required this is in line with the London Plan which identifies the Wandle Valley as a potential outer development centre and strategic hub for culture function. Background evidence from the ELPS has identified that the creative and digital economies are growing strongly for Wandsworth and this is an area the council are keen to support. As mentioned clustering helps benefit the businesses as well as giving a distinct character to the area. The other background documents such as; The Lombard Road SPD, Area Spatial Strategy for the Wandle Delta area, Cultural vision for Nine Elms and the Site Allocations all provide the framework for the areas identified within EI4 where cultural workspace would be required. As there is an identified strong demand for cultural workspace within the borough it is deemed reasonable to have allocations within these larger sites, which can be taken into consideration at the outset of development.</p> <p>Part 3</p> <p>The ELPS 2016 identified that sectors within the creative and digital economies are both growing strongly in Wandsworth and as identified</p>	



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									<p>flexibly to ensure the delivery of new developments across the borough.</p> <p>Part 3 of Policy EI 4 states :</p> <p>"Developments that provide workspace for specialist sectors will be supported. In particular, workspace that meets the specific needs of the creative, digital, and food and drink industries will be encouraged. Cultural workspace will be required on sites within Nine Elms, the Wandle delta area, the Lombard Road York Road Focal Point, and in the Industrial Business Park areas of the SIL. Cultural workspace will be encouraged elsewhere on town centre, local centre and focal point sites as appropriate. Opportunities for clustering of specialist sectors will be encouraged. " (our emphasis)</p> <p>Schroders welcomes the Council's approach in promoting the cultural floorspace in the IBP. For example, Battersea Studios presents an excellent example of where a cultural/creative workspace cluster has formed through the provision of SME workspaces. However, as stated in our previous representations, Schroders acknowledges that It may not be appropriate to promote creative workspace in every large scale employment development. Given that the Council did not provide their response to this specific matter, Schroders requests it to be considered during the proposed submission version consultation. In this context, it strongly encourages the Council to assess the requirement for the provision of this type of floorspace on a case by case basis, subject to demand and viability of development proposals.</p>		within the GLA 'Artists Workspace Study' 2014, businesses in the cultural sector in particular can struggle to find affordable premises. As with all planning obligations the council will take into consideration viability issues and the Policy supports a wide variety of workspace which can be considered as cultural workspace.	
Unknown	Schroders Real Estate Investment Management	Managing land for industry and distribution	Policy EI 6	994433	Not Specified	Not specified	Not specified	Not specified	<p>Policy EI 6 'Managing land for industry and distribution'</p> <p>Paragraph 2.26 of the supporting text to Policy EI 6 confirms that the Strategic Industrial</p>	This issue will be a core topic to be addressed in the forthcoming review of the London Plan, and Schroders suggests that Wandsworth	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment	

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									<p>Location (SIL) and Locally Significant Industrial Areas (LSIAs) are not appropriate locations for any sort of residential use, and other non-industrial uses. Schroders fully understands the aims and aspirations of the SIL and LSIAs policy designations. However, given the changing demands and styles of employment premises, Schroders considers that more flexibility should be given to certain types of development proposals in these designations, as such for complementary uses that can work alongside the employment premises.</p> <p>Schroders acknowledges the importance of protecting SILs and LSIAs. However, it considers that policies for the IBP could create an opportunity for them to act as a transition and buffer zone for the SIL and surrounding industrial uses.</p> <p>In particular, sites such as Battersea Studios should be given greater flexibility to thrive and meet employment and residential demand in the LB Wandsworth, whilst meeting the overall aims of the IBP to promote a higher quality environment for employment uses and provide a buffer zone between the residential uses to the west and the harder industrial uses to the east.</p> <p>This approach would be consistent with the emerging thinking of the Mayor of London, who addressed the potential of mixing residential and employment uses in his publication "A City for all Londoners", which stated :</p> <p>"While recognising the need to promote economic growth, I know that the economy is changing and that we must use land intelligently - particularly in the context of a housing crisis that threatens the competitiveness of the city. In some areas, industrial land may be surplus to current needs and could be better used for housing. It may be</p>	<p>Council introduces greater flexibility into its local plan to enable consideration of proposals for a mix of uses in suitable locations.</p>	<p>land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS.</p> <p>It is considered that the LPIED approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. The Council considers that it is the role of</p>	

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									<p>possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial/and. 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."</p> <p>In this context, in September 2016, Schroders submitted Battersea Studios as a potential development site as part of LB Wandsworth Call for Sites. Its submission set out the potential approach of delivering high quality co-working floorspace on the Battersea Studios site. The aim is to pursue sustainable development by increasing the density and intensity of employment uses in the SIL, while delivering this alongside complementary co-living build to rent floorspace. This would create additional workplace by increasing density, whilst provision of other uses, including residential uses, would create permanent neighbourhoods where people can live and work.</p>		the Industrial Business Park to accommodate any potential intensification of the SIL. An effective SIL needs sufficient critical mass, defensible and defensible boundaries, and a prohibition on housing and other sensitive uses. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land of the SIL and considers the approach to safeguarding the SIL in accordance with this evidence.	
Unknown	Workspace Group PLC	Local Plan - Employment and Industry Document - proposed submission version - March 2017		994958	Not Specified	Not specified	Not specified	Not specified	Whilst our client appreciates this increase in flexibility, they consider that de-designation from its status as a SIL is necessary (and appropriate) to facilitate a more inclusive redevelopment scheme which responds to its evolving surrounding context. (With ref to this site Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS)		Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a	

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											<p>cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS.</p> <p>It is considered that the LPIED approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. The Council considers that it is the role of the Industrial Business Park to accommodate any potential intensification of the SIL. An effective SIL needs sufficient critical mass, defensible and defendable boundaries, and a prohibition on housing and other sensitive uses. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-</p>	

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											wide research demonstrate the importance of safeguarding existing employment land of the SIL and considers the approach to safeguarding the SIL in accordance with this evidence.	
Unknown	Workspace Group PLC	Locations for new employment floorspace	Policy EI 2	994958	Not Specified	Not specified	Not specified	Not specified	<p>EI 2 Economic Use Intensification Area</p> <p>Our client's site is well-suited to the EUIA designation as it currently forms part of an industrial area, which through intensification and consolidation of the economic uses has capacity to provide an overall increase in industrial and other business floorspace as well as residential development and improvements to the spatial character of the area. Moreover, given that the former bingo hall and the Riverside Business Park form one contiguous block in a single ownership, it is not envisaged that there will be significant spatial and land use changes in the wider area.</p>	Following our previous representations on the Employment and Industry Review in December 2015 and November 2016, our client is very pleased to see that latest submission document now identifies the site as an Economic Use Intensification Area (EUIA) under new Policy EI2 (Locations for new employment floorspace).	Support noted. No change required.	
Unknown	Workspace Group PLC	Affordable, flexible and managed workplaces	Policy EI 4	994958	Not Specified	Not specified	Not specified	Not specified	<p>Policy EI4 – Affordable, Flexible and Managed Workplaces</p> <p>Our client is not fully supportive of Policy EI4 (Affordable, flexible and managed workplaces) which requires developments providing more than 1,000sqm of economic floorspace to contribute directly to the provision of affordable, flexible and managed workspaces, either by:</p> <p>i. Providing a significant element of managed workspace that includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro and small businesses; or</p> <p>ii. Providing a proportion of office floorspace at an affordable rent in perpetuity.</p> <p>We do not agree that affordable creative</p>		Comments noted. No change required. The purpose of policy EI4 is to ensure that affordable workspace is achieved within the borough. The Council is aware that managed workspace providers have different business models and seek developments of different sizes, from small units providing desk space to very large developments providing a broad range of office sizes or large floorplate co-working space. The application of policy is flexible in allowing developers to deliver the managed workspace themselves if they choose not to work with a managed workspace provider, or if this is	

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									<p>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.</p> <p>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).</p> <p>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</p>		not a route they wish to pursue there is the option of affordable rent. The definition of affordable workspace is set out within the glossary, and also the criteria to achieve this is set out within policy EI4. As stated in their rep Workspace Group PLC already operate a business plan which is likely to meet the provisions of the criteria and hence this would provisionally be considered favourably in light of the policy requirements. It is not considered that the policy is overly prescriptive in its aims.	

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									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.			
Unknown	Workspace Group PLC	Managing land for industry and distribution	Policy EI 6	994958	Not Specified	Not specified	Not specified	Not specified	<p>We write on behalf of our client, Workspace Group PLC, to make representations on the London Borough of Wandsworth's Local Plan 'Employment and Industry Review – Proposed Submission' with particular reference to the following site:</p> <p>- Hewlett House &amp; Avro House, Havelock Terrace, Battersea, London, SW8 4AS</p> <p>We had previously submitted representations for the site during the Employment and Industry Reviews in December 2015 and November 2016. We acknowledge that our client's site retains its SIL designation but is now deemed appropriate for Industrial Business Park (IBP) uses under new Policy EI 6 (Managing land for industry and distribution).</p> <p>Whilst our client appreciates this increase in flexibility, they consider that de-designation from its status as a SIL is necessary (and appropriate) to facilitate a more inclusive redevelopment scheme which responds to its evolving surrounding context.</p> <p>Industrial Business Parks</p> <p>Our client is principally concerned with the future planning policy approach to the provision of new business space (particularly SME - small and medium enterprises - accommodation) and the rejuvenation of existing employment areas. The modern SME market requires well managed, modern,</p>	<p>We consider that our client's site should be granted a more flexible designation such as an Economic Use Intensification Area (EUIA) in order to facilitate the successful regeneration of the plot by Workspace. Other areas falling under the EUIA designation have been given site allocations which ensure that the levels of employment or industrial floorspace are retained and/or increased as part of future schemes. These measures ensure that the industrial character of the area is not eroded as part of any future development.</p> <p>The property could be removed from its existing designation and cause no substantial harm to the integrity of the Queenstown Road SIL as a whole; the site is already on the periphery of the SIL designation and is physically isolated from the rest of the SIL by a series of railway lines. Removing the designation and/or including this site in the</p>	<p>Comments noted. No change required. Policy EI6 sets out that IBPs are suitable for the provision of SMEs. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify the industrial offer. This is in alignment with the London Plan which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the</p>	

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									<p>flexible B1 space, offered with flexible lease arrangements. Space should also be flexible/adaptable, but importantly offer businesses supporting services to build a strong business community. The proposed Strategic Industrial Land (SIL) and IBP designations and associated protections for industrial uses only do not adequately cater for the operational habits of SMEs. From our Client's perspective, it must be recognised that the renewal/regeneration/improvement of older business centres is only likely to be achievable/viable if the above model is incorporated to allow for supporting mixed-uses on existing sites, which allows higher value uses (such as residential, retail etc.) to act as an enabler. The London Plan requires Industrial Business Parks (IBPs) to have quality surroundings including research and development, light industrial and higher value general industrial units. All of these potential uses do not conflict with residential uses to the same extent that factories or heavy industrial units would.</p> <p>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.</p> <p>The designation of the western edge of the Queenstown Road SIL as IBP was recommended in the Stewarts Road Study (URS, 2010) in order to provide a buffer zone between the residential area to the west and the heavier industries in the remainder of the area, in expectation that these heavier industrial uses would be intensified. It appears that the Council are using this justification in the same way for Havelock Terrace and creating a buffer of 'softer' industrial uses.</p>	<p>emerging site allocation document would increase the flexibility of the site and still provide the desired 'buffer' which would contain the SIL to the areas south of the railway.</p>	<p>transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less</p>	



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									<p>However the ELPS already acknowledges that the site is already isolated from the core of the SIL, so this measure is arguably negated.</p> <p>We consider that our client's site should be granted a more flexible designation such as an Economic Use Intensification Area (EUIA) in order to facilitate the successful regeneration of the plot by Workspace. Other areas falling under the EUIA designation have been given site allocations which ensure that the levels of employment or industrial floorspace are retained and/or increased as part of future schemes. These measures ensure that the industrial character of the area is not eroded as part of any future development.</p> <p>The property could be removed from its existing designation and cause no substantial harm to the integrity of the Queenstown Road SIL as a whole; the site is already on the periphery of the SIL designation and is physically isolated from the rest of the SIL by a series of railway lines. Removing the designation and/or including this site in the emerging site allocation document would increase the flexibility of the site and still provide the desired 'buffer' which would contain the SIL to the areas south of the railway.</p> <p>Evolving Context</p> <p>Havelock Terrace forms a small part of the Queenstown Road Significant Industrial Area (SIL). The site is completely separated from the bulk of the SIL designation by the railway network 60metres to south of the site. This isolated section of SIL generally comprises light industrial units across the southern third, whilst the office, studio and workshops of our client's Havelock Terrace site occupies the middle third, and the northern third offers offices, commercial units and two public houses. The</p>		<p>dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>	

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									<p>northern third of the site appears to have been removed from the SIL designation in the 2<sup>nd</sup> proposed submission (2014) and is subject to a major residential redevelopment.</p> <p>The northern site comprises; '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'.</p> <p>This site is currently subject to a pending planning application (LPA ref. 2016/5422) which seeks the following: 'Demolition of all existing buildings and construction of 4 buildings ranging from 9 to 16 storeys in height, comprising 162 residential units; office (B1) accommodation; drinking establishment (A4); flexible workspace/non-residential institution (B1/D1) use; flexible retail (A1/A2/A3) uses; car and cycle parking, servicing, refuse and associated plant; public realm improvements incidental to the development including the creation of a level threshold fronting Battersea Park Road and a new public route through the centre of the site; hard and soft landscaping works; infrastructure works and other associated works An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (As amended) (Amended Description)'</p> <p>Whether approved or not, the application clearly demonstrates the residential aspirations for the neighbouring site. At present the site immediately abuts the SIL which could cause conflicts between the two uses. Therefore we argue that a more significant designation change is required to allow our client to adapt to the challenges posed by the neighbouring</p>			

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									site.			
Unknown	Workspace Group PLC	Riverside Business Centre and former Bingo Hall, Bendon Valley, SW18		994958	Not Specified	Not specified	Not specified	Not specified	<p>Following our previous representations on the Employment and Industry Review in December 2015 and November 2016, our client is very pleased to see that latest submission document now identifies the site as an Economic Use Intensification Area (EUIA) under new Policy EI2 (Locations for new employment floorspace). The Council's associated consultation report acknowledges:</p> <p><i>'Having analysed the responses, and in particular that of Workspace Group PLC, it is clear that the former bingo hall site, in conjunction with the Riverside Business Centre, have the capacity to provide a substantially increased quantity of business floorspace, including substantial amounts of industrial floorspace. The site is also large enough to allow for a mix of uses including residential use without compromising industrial uses on the site or in the remainder of the Bendon Valley LSIA'.</i></p> <p>Our client agrees with the Council's statement and appreciates that they have opted for a site allocation rather than a potentially restrictive area spatial strategy. The directives given in the site allocation provide a useful steer on potential layouts, uses and mass without being too prescriptive.</p>		Support noted. No change required.	
Unknown	Workspace Group PLC	Riverside Business Centre and former Bingo Hall, Bendon Valley, SW18		994958	Not Specified	Not specified	Not specified	Not specified	<p>Site Allocation 99F</p> <p>Our client supports the proposed site allocation for the Riverside Business Centre and is pleased to see the entire site is now within the allocation. However our client does seek one point of clarification; the site allocation specifies the following: 'Mixed use development</p>		Comments noted. It is considered that the site allocation designation at Riverside business centre is sound and based on robust and credible evidence. The intention of the site allocation is to seek to reprove the	Amend 'Site Allocation' section to read:  "Redevelopment of the site should provide at least a 25% increase in the existing amount of <del>both</del> industrial (use classes

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									<p>including residential and economic uses. Redevelopment of the site should provide at least a 25% increase in the amount of both industrial and office floorspace'. Our client queries whether the amount of industrial and office floorspace has to evenly increase by 25% each or whether the amount of combined industrial and office floorspace must increase by 25% overall but can be unevenly split between the two uses.</p> <p>An alternative approach was proposed for Chelsea Cars and KwikFit, Armoury Way, SW18. The site allocation requires provision of 'at least a 25% increase in the amount of <i>economic floorspace</i>' which is considered to offer greater flexibility.</p> <p>Finally, there appears to be little reference to the importance of SMEs within this designation despite the applicant 'Workspace' owning the site and making up a vast proportion of businesses in the Borough. Therefore, we would encourage that the promotion of SMEs are given more prominence in Policy EI 2.</p>		<p>existing quantum and type of floorspace and the 25% increase will be based on the existing floorspace use.</p> <p>Therefore the site allocation wording is proposed to be amended to clarify this position.</p>	<u>B1c/B2/B8/SG) and office (use class B1a) floorspace'</u>
Unknown	38 Havelock Terrace Ltd	Encouraging sustainable economic growth	Policy EI 1	995648	No	Yes	No	Yes	We fully endorse the borough-wide objectives of the Plan.		Support welcomed. No change required.	
Unknown	38 Havelock Terrace Ltd	Encouraging sustainable economic growth	Policy EI 1	995648	No	Yes	No	Yes	<p>Policy EI1 of the draft EID states that in order to encourage sustainable economic growth, a balanced approach needs to be taken to protect established economic areas as well as promoting redevelopment of sites and premises that have the potential to intensify, in order to better meet the needs of the local economy.</p> <p>We encourage this approach and Policy EI1 is correct to focus sustainable economic growth within the borough's five established town centres and the emerging centre at Battersea Power Station. Of particular significance is the</p>		Comments noted. No change required.	

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									digital firm Apple who has been identified as a key future occupant for a large quantity of office floorspace at Battersea Power Station. The presence of Apple in the borough will act as a catalyst for the digital industry as well as the creative sector which is associated with and supports the digital industry.			
Unknown	38 Havelock Terrace Ltd	Locations for new employment floorspace	Policy EI 2	995648	No	Yes	No	Yes	<p>We are aware that the Council is currently reviewing policies in its Local Plan that relate to employment land. More particularly, the Council published the proposed submission version of its Local Plan Employment and Industry Document(EID) earlier this year which will guide development in the borough over the next 15 years and will inform decisions on planning applications.</p> <p>We act on behalf of the owners of 38 Havelock Terrace, which will be affected by the proposed EID. Accordingly, we have been invited by Wandsworth Council to make comments on the draft, which we set out below.</p> <p>The EID confirms that the strategic objectives for the Local Plan include; maximising the employment potential of land; safeguarding land and buildings for business and industrial use; and, promoting development for employment purposes in appropriate locations. It also looks to promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough.</p> <p>Looking more closely at 38 Havelock Terrace, the site comprises an enclosed yard of 410m2 in area. The site is currently vacant but last in lawful Class B1(c) use. The site is located on the corner where Havelock Terrace meets Pagden Street. The site backs onto the Gladstone Court Business Centre and railway viaduct providing access through to the neighbouring Newton</p>	<p>We refer to the Employment Land and Premises Study 2016 prepared by AECOM Ltd, commissioned by Wandsworth Council to inform the EID.</p> <p>The recommendations in the AECOM report states (at R5) that 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.</p> <p>Moreover, whilst 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, it juts out from the core area of the SIL being the only portion located north of the railway lines into Vauxhall/London</p>	<p>Comments noted. No change required. Policy EI2 sets out that the IBP areas can provide economic uses, and allows for office use as well as workspace for SMEs. Therefore it does not restrict the intention of Havelock Terrace developers to promote investment in modern business floorspace. The SIL plays a crucial role in providing industrial land for Wandsworth and is recognised in the London Plan as being of strategic importance for London and which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses.. The loss of industrial land from the SIL would put significant pressure on the remaining industrial sites in the borough. It would not be appropriate to further dilute the land of the SIL in the IBP.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence</p>	

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									<p>Preparatory School.</p> <p>The site falls within the Queenstown Road Strategic Industrial Location (SIL). The site also falls within the Nine Elms area.</p> <p>The proposed EID is further suggests that the above areas should be the main focus for new office development, complemented by office development around the edge of these town centres.</p> <p>The edge of centre sites, which include 38 Havelock Terrace, are primarily under-utilised industrial uses that have the capacity to provide substantial quantities of economic floorspace, both for office use and industrial use. This is reiterated under proposed Policy EI2 which states that new office development will be supported within the parts of the SIL identified for Industrial Business Park.</p> <p>We acknowledge that the SIL is not and should not be intended for large-scale office development, as this will be focused in the planned parts of the Nine Elms developments to the north. However there is clearly a significant opportunity to support that development with peripheral and more flexible and attainable workspace for SMEs.</p> <p>Whilst we acknowledge and generally support this aspiration, we do not consider it appropriate to apply the policy rigidly in the SIL. Individual site circumstances' should be given greater weight.</p>	<p>Waterloo, and thus is to some degree separated from it. The study forecasts a requirement for either broad retention with some loss of industrial land in LB Wandsworth to 2030, although the study suggests that there are sites of poorer quality and greater redevelopment potential than Havelock Terrace to meet this requirement.</p> <p>Given the site's context, the study recommends that intensification, which might include other employment uses be explored at this location, to ensure an appropriate level of development at this strategically important location.</p> <p>It is our view that the northern part of the IBP will attract demand from higher-value employment, and more specifically, office uses (or similar), which we believe the EID should advocate, with lesser emphasis on non-compatible industrial uses.</p>	<p>base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS.</p> <p>It is considered that the LPIED approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. The Council considers that it is the role of the Industrial Business Park to accommodate any potential</p>	

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											intensification of the SIL. An effective SIL needs sufficient critical mass, defensible and defensible boundaries, and a prohibition on housing and other sensitive uses. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land of the SIL and considers the approach to safeguarding the SIL in accordance with this evidence.	
Unknown	38 Havelock Terrace Ltd	Protected employment land and premises	Policy E13	995648	No	Yes	No	Yes	<p>In acknowledgement of the above, we fully endorse the Council's proposal to extend the 'Industrial Business Park' designation to include the northern part of the Queenstown Road SIL, and its aim to capture these opportunities and enable the creation of a critical mass of business floorspace in the SIL.</p> <p>Policy E11 of the draft EID states that in order to encourage sustainable economic growth, a balanced approach needs to be taken to protect established economic areas as well as promoting redevelopment of sites and premises that have the potential to intensify, in order to better meet the needs of the local economy.</p>		Support welcomed. No changes required.	

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Unknown	38 Havelock Terrace Ltd	Requirements for new employment development	Policy EI 5	995648	No	Yes	No	Yes	We further support the EID's aspiration to promote workspace for specialist sectors including the specific needs of the creative and digital industries, ensuring new employment floorspace are suitable for modern business needs. We advocate the 'office quality standards', e.g. minimum floor to ceiling height, proposed in Policy EI5.		Support noted. No changes required.	
Unknown	38 Havelock Terrace Ltd	Managing land for industry and distribution	Policy EI 6	995648	No	Yes	No	Yes	<p>We acknowledge that the SIL is not and should not be intended for large-scale office development, as this will be focused in the planned parts of the Nine Elms developments to the north. However there is clearly a significant opportunity to support that development with peripheral and more flexible and attainable workspace for SMEs.</p> <p>This is recognised in proposed Policy EI6 which identifies parts of the Queenstown Road/Industrial Business Park to have capacity to provide intensified economic uses.</p> <p>We refer to the Employment Land and Premises Study 2016 prepared by AECOM Ltd, commissioned by Wandsworth Council to inform the EID.</p> <p>The recommendations in the AECOM report states (at R5) that 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.</p> <p>Moreover, whilst 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, it juts out from the core area of the SIL being the only portion located north of the railway lines</p>	<p>Whilst we advocate industrial uses in the IBP, further consideration should be given to the interaction of the uses with neighbouring sites. More particularly, the northern extent of the Havelock Terrace protrusion of the SIL, following the opening of the Northern Line Extension station at Battersea Power Station, will benefit from increase in PTAL, making the area a much more sustainable and accessible location by foot. The improved accessibility the new station offers and the provision of retail, leisure and social infrastructure through the redevelopment of VNEB OA (e.g. Palmerston Court to the north) will only serve to exacerbate potential conflicts as identified above.</p> <p>It is our view that the northern part of the IBP will attract demand from higher-value employment, and more specifically, office uses (or similar), which we believe the EID should advocate, with lesser</p>	<p>Support noted for intensification of uses and SMEs in the IBP. No change required. Regarding the point about the placing of an increased emphasis on office floorspace for the IBP, it is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify the industrial offer. This is in alignment with the London Plan which states that IBPs are not intended for large scale office development, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses.</p> <p>The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the</p>	



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									<p>into Vauxhall/London Waterloo, and thus is to some degree separated from it. The study forecasts a requirement for either broad retention with some loss of industrial land in LB Wandsworth to 2030, although the study suggests that there are sites of poorer quality and greater redevelopment potential than Havelock Terrace to meet this requirement.</p> <p>Given the site's context, the study recommends that intensification, which might include other employment uses be explored at this location, to ensure an appropriate level of development at this strategically important location.</p> <p>With regard to on-site individual circumstances, industrial uses (whether B1(c), B2 or B8) typically require elements of off-street parking, access and servicing. 38 Havelock Terrace, for example, comprises a site of just 410m2 in area. To accommodate on-site servicing, parking and access would take up a significant proportion of the site, and ultimately hinder any meaningful intensification for employment uses sought by the EID.</p> <p>Furthermore, whilst parking and servicing may be achievable on-street, there are issues with permeability and traffic flow. Havelock Terrace is not a through road; moreover 38 Havelock Terrace sits at the junction with Pagden Street, which to the immediate west provides a well-used pedestrian route under the railway to Newton Preparatory School. The presence of HGVs and high volumes of traffic make the area difficult to navigate. The lack of safe pedestrian circulation routes and crossing areas in an area of high traffic movement constrain intensification within the locality for B1c-B8 uses.</p> <p>Whilst we advocate industrial uses in the IBP, further consideration should be given to the interaction of the uses with neighbouring sites.</p>	emphasis on non-compatible industrial uses.	transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of and Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan and it is considered that this approach gives sufficient flexibility to allow for SME business space. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of	

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									<p>More particularly, the northern extent of the Havelock Terrace protrusion of the SIL, following the opening of the Northern Line Extension station at Battersea Power Station, will benefit from increase in PTAL, making the area a much more sustainable and accessible location by foot. The improved accessibility the new station offers and the provision of retail, leisure and social infrastructure through the redevelopment of VNEB OA (e.g. Palmerston Court to the north) will only serve to exacerbate potential conflicts as identified above.</p> <p>It is our view that the northern part of the IBP will attract demand from higher-value employment, and more specifically, office uses (or similar), which we believe the EID should advocate, with lesser emphasis on non-compatible industrial uses.</p>		development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/wh-at-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/wh-at-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.	
Unknown	Charterhouse Property Group	Local Plan - Employment and Industry Document - proposed submission version - March 2017		1006262	Not Specified	Not specified	Not specified	Not specified	<p>Whilst we are supportive of the overall principles proposed in the Proposed Submission version of the Employment and Industry Local Plan, it is considered that additional flexibility is required to enable the delivery of a mixed-use scheme on the site which complies with the surrounding residential and office uses.</p>		<p>Comments noted. Upon further assessment the council considers that the existing use of the HSS Hire unit (92 Putney Bridge Road) does not fall into either office or industrial use classification. The site allocation at 92 Putney Bridge Road allows for redevelopment to include residential uses subject to the requirements of policies E13 and E15. The site falls within a cluster of sites that are within an employment protection area; 57 Putney Bridge Road, 88-92 Putney Bridge Road and 2-3 Adelaide Road. To ensure the intention of the site allocation is clear the wording is proposed to be amended to reflect that the</p>	<p>Amend wording at 'site description' and 'site allocation' to read:</p> <p>Site description: The site is occupied by a single storey industrial building, used for tool hire.</p> <p>Site Allocation: The site is located within an Employment Protection Area. Redevelopment of the site should provide the <u>existing employment generating industrial</u> floorspace <del>or, if there is no demand for this</del></p>

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											existing use is not industrial floorspace and any redevelopment must include the same quantity of floorspace as employment generating floorspace due to its location as a cluster of employment generating uses.	<del>use, should provide with</del> the same quantity of employment floorspace <del>(as set out in policy E13)</del> . Redevelopment could include residential uses as well as employment use, subject to the requirements of policies E13 and E15.
Unknown	Charterhouse Property Group	Protected employment land and premises	Policy E13	1006262	Not Specified	Not specified	Not specified	Not specified	<p>We strongly support the more flexible nature of the site, as an Employment Protection Area, which supports mixed use redevelopment of the site.</p> <p>Historically, the Point Pleasant Works site is designated within the Central Wandsworth Locally Significant Industrial Area (LSIA) and as such, the loss of existing B1(c), B2 and B8 floorspace would be resisted unless full replacement provision is provided. However, as part of the emerging Employment and Industry Local Plan we have submitted representations on behalf of Charterhouse proposing the de-designation of the site from this allocation.</p> <p>The latest Proposed Submission version of the Local Plan: Employment and Industry Document (March 2017) still allocated the site as an Employment Protection Area. The Site Allocation states;</p> <p>"The site is located within an Employment Protection Area. Redevelopment of the site should re-provide the industrial floorspace or, if there is no demand for this use, should provide the same quantity of employment floorspace (as set out in policy E13). Redevelopment could include residential uses as well as employment use, subject to the requirements of policies E13</p>	<p>Development proposals currently considered by Charterhouse comprise redevelopment of the site to provide a new mixed use building with Class B1a use on the ground and first floor levels, with residential use (approx. 8-10 units) on the upper floors. The provision of Class B1a floorspace would increase the employment use associated with the site beyond the current use of the site as an equipment and tool hire business. This proposed mix of land uses is considered appropriate with regards to the surrounding uses.</p> <p>In terms of the massing of any new building on the proposed site we would suggest that the site allocation should be flexible, in order to allow development to maximise the sites potential. We note that the Site Allocation also highlights that tall buildings</p>	<p>Comments noted. Upon further assessment the council considers that the existing use of the HSS Hire unit (92 Putney Bridge Road) does not fall into either office or industrial use classification. The site allocation at 92 Putney Bridge Road allows for redevelopment to include residential uses subject to the requirements of policies E13 and E15. The site falls within a cluster of sites that are within an employment protection area; 57 Putney Bridge Road, 88-92 Putney Bridge Road and 2-3 Adelaide Road. To ensure the intention of the site allocation is clear the wording is proposed to be amended to reflect that the existing use is not industrial floorspace and any redevelopment must include the same quantity of floorspace as employment generating floorspace due to its location as a cluster of employment generating uses.</p>	<p>Amend wording at 'site description' and 'site allocation' to read:</p> <p>Site description: The site is occupied by a single storey industrial building, used for tool hire.</p> <p>Site Allocation: The site is located within an Employment Protection Area. Redevelopment of the site should re-provide the <u>existing employment generating industrial floorspace</u> <del>or, if there is no demand for this use, should provide with</del> the same quantity of employment floorspace <del>(as set out in policy E13)</del>. Redevelopment could include residential uses as well as</p>

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									<p>and E15".</p> <p>Having regard to the above, one of the key requirements of Policy E13 states;</p> <p>"Redevelopment proposals in employment protection areas for mixed use including residential will be permitted if the development would result in no net loss of the existing office and industrial floorspace and if the mix of uses can be successfully achieved on site in accordance with policy E15".</p> <p>In relation to the mix of uses, Policy E15 states;</p> <p>"In mixed use developments, particularly those that include residential use, the layout and design of the development will need to ensure that uses complement one another, that the amenity of residents and the operational requirements of businesses are designed in, and that any conflicts are mitigated to a high standard".</p> <p>Mixed use redevelopment of the site is considered appropriate considering land 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. There 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. Considering its surrounding context, the site is not suitable for use for noisy industrial or storage uses (Class B1c; B2 and B8 uses) which would have an adverse impact on the amenity of the immediate area.</p> <p>We consider that the provision of modern high</p>	<p>in this location would likely be considered inappropriate. In accordance with the Council's policy requirements, the provision of buildings of five storeys or above would be considered to be tall. However, the site is bounded by the railway line to the and Wandsworth Council Housing Centre which extends to 4 storeys, with a pitched roof. To the north of the railway line is an existing residential building which extends to a maximum of 6 storeys. As such, we consider that a building of up to 6 storeys, with storeys above the 4th floor level stepped back, should be considered acceptable in this location, adjacent to the railway line. In light of the above, Charterhouse supports the site allocation in the Employment and Industry Local Plan: Proposed Submission Version however, they consider additional flexibility should be incorporated into the policy wording to enable the provision of Class B1a uses on the lower floors of any new building rather than re-provide the existing tool hire operation or similar. Residential accommodation could then be provided above which would</p>		<p>employment use, subject to the requirements of policies E13 and E15.</p>

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									<p>grade B1a floorspace within the lower floors of a mixed-use scheme would address the requirements of the ensuring there is no net loss of existing employment floorspace and would create significantly more employment opportunities than exist on site previously. It would also compliment the adjacent office buildings and surrounding residential properties.</p> <p>Whilst we support the objective to maintain and support the economic health of the borough, in light of the above, we consider the site to be more appropriate for a mixed-use development comprising residential land use to help meet local housing need and new office space to meet existing demand and provide new job opportunities. We would request that the site specific policy wording is amended to reflect this.</p> <p>and</p> <p>Whilst we support the reprovision of employment floorspace on the site we do not consider that the provision of the same quantum of employment floorspace should be a necessary requirement of any proposed redevelopment. The reprovision of employment floorspace should instead place greater emphasis on the type of space provided and the number of jobs created. The proposed mixed-use redevelopment of the site, including Class B1a use, would provide opportunity for new employment/office floorspace and will result in a more intensive use of the site including a greater number of jobs provided.</p>	compliment the surrounding area.		
Unknown	Charterhouse Property Group	Site allocations	4	1006262	Not Specified	Not specified	Not specified	Not specified	Charterhouse supports the site allocation in the Employment and Industry Local Plan: Proposed Submission Version however, they consider additional flexibility should incorporated into the policy wording to enable the provision of		Comments noted. Upon further assessment he council considers that the existing use of the HSS Hire unit (92 Putney Bridge Road) does	Amend wording at 'site description' and 'site allocation' to read:

Representor's Name	Representor Organisation	Title	Para	Representor ID	Wish to be heard?	Legally compliant?	Sound?	Duty to co-operate?	Response	Changes necessary	Officers' Recommendation	Outcome
									Class B1a uses on the lower floors of any new building rather than re-provide the existing tool hire operation or similar. Residential accommodation could then be provided above which would compliment the surrounding area.		not fall into either office or industrial use classification. The site allocation at 92 Putney Bridge Road allows for redevelopment to include residential uses subject to the requirements of policies E13 and E15. The site falls within a cluster of sites that are within an employment protection area; 57 Putney Bridge Road, 88-92 Putney Bridge Road and 2-3 Adelaide Road. To ensure the intention of the site allocation is clear the wording is proposed to be amended to reflect that the existing use is not industrial floorspace and any redevelopment must include the same quantity of floorspace as employment generating floorspace due to its location as a cluster of employment generating uses.	Site description: The site is occupied by a single storey industrial building, used for tool hire.  Site Allocation: The site is located within an Employment Protection Area. Redevelopment of the site should re-provide the <u>existing employment generating industrial floorspace</u> <del>or, if there is no demand for this use, should provide with the same</del> quantity of employment floorspace <del>(as set out in policy E13)</del> . Redevelopment could include residential uses as well as employment use, subject to the requirements of policies E13 and E15.
Unknown	Charterhouse Property Group	Site allocations	4	1006262	Not Specified	Not specified	Not specified	Not specified	Wandsworth River Side Quarter, Point pleasant SW18  The Mayor acknowledges in his draft 'A City for all Londoners' document that whilst recognising the need to promote economic growth, the economy is changing and land must be used intelligently, particularly in the context of a housing crisis. The Mayor advises 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	Mixed use redevelopment of the site is considered appropriate considering land surrounding the site is predominantly mixed use in nature.  We consider that the provision of modern high grade B1a floorspace within the lower floors of a mixed-use scheme would address the requirements of the ensuring there is no net loss	Comments noted. Upon further assessment he council considers that the existing use of the HSS Hire unit (92 Putney Bridge Road) does not fall into either office or industrial use classification. The site allocation at 92 Putney Bridge Road allows for redevelopment to include residential uses subject to the requirements of policies E13 and E15. The site falls within a cluster of sites	Amend wording at 'site description' and 'site allocation' to read:  Site description: The site is occupied by a single storey industrial building, used for tool hire.  Site Allocation: The site is located within an Employment

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									<p>industrial land. As such, the Mayor encourages creativity in how we think about space and promotes mixed-use activity.</p> <p>We strongly support the more flexible nature of the site, as an Employment Protection Area, which supports mixed use redevelopment of the site.</p>	<p>of existing employment floorspace and would create significantly more employment opportunities than exist on site previously. It would also compliment the adjacent office buildings and surrounding residential properties.</p> <p>Whilst we support the objective to maintain and support the economic health of the borough, in light of the above, we consider the site to be more appropriate for a mixed-use development comprising residential land use to help meet local housing need and new office space to meet existing demand and provide new job opportunities. We would request that the site specific policy wording is amended to reflect this.</p> <p>It is therefore considered wholly appropriate that any potential mix of uses on the site could include residential use, which would compliment the surrounding uses as identified above, and which would provide much needed new housing in this part of the Borough.</p> <p>Whilst we support the re-provision of employment floorspace on the site we do not consider that the</p>	<p>that are within an employment protection area; 57 Putney Bridge Road, 88-92 Putney Bridge Road and 2-3 Adelaide Road. To ensure the intention of the site allocation is clear the wording is proposed to be amended to reflect that the existing use is not industrial floorspace and any redevelopment must include the same quantity of floorspace as employment generating floorspace due to its location as a cluster of employment generating uses.</p>	<p>Protection Area. Redevelopment of the site should re-provide the <u>existing employment generating industrial floorspace</u> <del>or, if there is no demand for this use, should provide with the same</del> quantity of employment floorspace <del>(as set out in policy E13)</del>. Redevelopment could include residential uses as well as employment use, subject to the requirements of policies E13 and E15.</p>

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										provision of the same quantum of employment floorspace should be a necessary requirement of any proposed redevelopment. The reprovision of employment floorspace should instead place greater emphasis on the type of space provided and the number of jobs created. The proposed mixed-use redevelopment of the site, including Class B1a use, would provide opportunity for new employment/office floorspace and will result in a more intensive use of the site including a greater number of jobs provided.		
Unknown	Rockspring Property Investment Managers	Protected employment land and premises	Policy E13	1041290	Not Specified	Not specified	Not specified	Not specified	<p>This policy allows for the mixed-use redevelopment (including residential uses) of employment sites proposed to be designated, such as Jaggard Way. Notwithstanding our reservations in respect of the employment designation itself, we support the in-principle allowance for redevelopment at the site.</p> <p>However, we do not agree that redevelopment is predicated on like-for-like employment floorspace re-provision. The policy worded as per our suggestion above will ensure a more flexible approach can be taken which can take into account economic circumstances which change over time as well as individual site constraints.</p> <p>In particular, the site at Jaggard Way is better suited for more modern and flexible employment units which can have higher job densities than the existing industrial uses, and without the same amount of floorspace. Furthermore, individual site constraints</p>	<p>Instead, we proposed that this policy is worded:</p> <p>“Redevelopment proposals in employment protection areas for mixed use including residential will be permitted if the mix of uses can be successfully achieved on site in accordance with policy E15 and the development would result in no net loss of the existing office and industrial floorspace; or can demonstrably provide economic benefits, including but not limited to, a higher quality employment space that better meets local needs, or increased job creation/employment</p>	<p>Comments noted. No change required. Policy E13 allows for residential use as part of a mixed-use scheme. The aim of the policy is to ensure that employment uses are protected, including in mixed use schemes and only allows for change of use subject to demonstrating that there is no demand for employment uses. This position is in accordance with the overall position in supporting the boroughs economy and the continuing demand for industrial uses to supplement the strategic reservoir of industrial land.</p>	



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									(including the need to ensure that building heights sensitively respond to the setting of Wandsworth Common and that a road access and turning head is maintained within the site) mean that the amount of overall floorspace that a scheme can provided is restricted.	<p>densities.”</p> <p>The policy worded as per our suggestion above will ensure a more flexible approach can be taken which can take into account economic circumstances which change over time as well as individual site constraints.</p> <p>Therefore the policy as worded will potentially deter redevelopment and will not allow the site to be best optimised in terms of physical regeneration and the provision of better quality employment space and housing, including affordable housing.</p>		
Unknown	Rockspring Property Investment Managers	Requirements for new employment development	Policy EI 5	1041290	Not Specified	Not specified	Not specified	Not specified	<p>On behalf of Rockspring Property Investment Managers (PIM), we are pleased to make representations to the Employment and Industry Local Plan (EILP) Review: Proposed Submission Version consultation.</p> <p>These representations make specific reference to land at Jaggard Way, which is owned by Cheshire West and Chester Borough Council, but managed by Rockspring PIM.</p> <p>In line with the representations that we made to the Policy Options Consultation Version of the EILP Review (our letter dated 4 November 2016), we remain of the view that industrial demand ought to be accommodated within existing Strategic Industrial Locations and Locally Significant Industrial Areas, as concluded by the evidence based document which underpins the EILP (the Employment Land and Premises Study (ELPS) (2016)</p>	<p>We remain of the view that industrial demand ought to be accommodated within existing Strategic Industrial Locations and Locally Significant Industrial Areas, as concluded by the evidence based document which underpins the EILP (the Employment Land and Premises Study (ELPS) (2016) prepared by AECOM).</p> <p>Notwithstanding, we consider that proposed Policy EI3 should be reworded to allow for redevelopment of existing employment areas to provide an economic betterment that does not</p>	<p>Comments noted. No change required. It is considered that the positive benefits of vertical stacking of uses, such as ensuring the uses of the development complement one another rather than creating conflicts between different uses, should be considered by an applicant at the design stage, and where feasible, implemented as such.</p> <p>Regarding the retention of existing businesses point, the Council seeks to protect established business as well as promoting redevelopment of sites as part of its strategic approach. The Council considers EI5 (4) to be sound as the policy reflects a balanced</p>	

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									<p>prepared by AECOM):</p> <p>"The majority of employment land within existing SIL and LSIA's remain the most suitable locations in Wandsworth for accommodating this industrial and warehousing demand. This corresponds to the principles set out in London Plan Policy 2.17. By comparison the Borough's MUFIEAs and non-designated industrial areas generally either contain average/poor quality sites (albeit with some good examples) and are considered appropriate for redevelopment for other uses where there is demand for this."</p> <p>Notwithstanding the above, these representations have a particular focus on emerging Policies E13 and E15.</p> <p><b>POLICY E15 – REQUIREMENTS FOR NEW EMPLOYMENT DEVELOPMENT</b></p> <p>Policy E15 sets out the requirements for new employment development and is relevant for proposals for mixed-use redevelopment of protected employment sites (including Jaggard Way).</p> <p>Paragraph 3, pertaining to mixed use developments, states that: "Where feasible, economic uses should be stacked vertically rather than spread across an area. This helps to make efficient use of a site, separate uses, simplify management and access arrangements, create agglomeration benefits for businesses, and give the area a distinct character."</p> <p>We consider that this requirement (although it is acknowledged it is dependent on feasibility) will facilitate a rigid design response and will not necessarily simplify management and access arrangements, contrary to the aims of the policy. Indeed the location of employment uses</p>	necessarily constitute like-for-like floorspace re-provision. Further, proposed Policy E15 should be re-worded to allow for a more flexible design approach to be taken for mixed use redevelopment; and this policy should not seek to control the businesses that operate at employment sites or the levels of rent paid, as these are outside of the scope of the planning system which at its heart is to control land use.	approach of seeking economic growth through redevelopment and re-provision of employment uses in areas which form a cluster of employment uses (such as Jaggard Way) whilst also acknowledging the importance of protecting existing businesses which contribute to the success of that cluster where they have a desire to remain on the site. The Council is aiming for its policies to be implemented whilst aiming to keep its existing established businesses.	

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									<p>spread horizontally at ground floor level with residential above is commonplace, simply because it works in practical terms.</p> <p>Paragraph 4 states that: ““Redevelopment of existing economic uses should wherever possible seek to retain existing business on site following development, with similar lease terms and rent levels, if those businesses wish to remain. Where possible, phasing of development should be planned in order to minimise the need for existing businesses to relocate, both during and after construction.”</p> <p>At its heart, the Town and Country Planning Act (1990) (as amended) controls land uses, not individual businesses that operate within those land uses and their rental levels.</p> <p>To put it another way, there is no control from the planning system over the businesses that operate in the units at Jaggard Way and the rent that those business pay (and nor should there be). If the owners wish to replace an existing business or change rent levels, they are free to do so without interference from the planning system. Therefore it follows that this should also be the case in the event of site redevelopment.</p> <p>Notwithstanding the above, it is the intention of Rockspring PIM to enter into dialogue with existing tenants about remaining at the site following the proposed mixed-use development; and it is not anticipated that rent levels will significantly change.</p>			
Unknown	Big Yellow Self Storage Company Ltd	Locations for new employment floorspace	Policy EI 2	1099383	Not Specified	Not specified	No	Not specified	<p>As set out below, BYSS considers that the draft Policy EI 2 fails the test of soundness outlined in paragraph 182 of the National Planning Policy Framework (NPPF).</p> <p>The sequential assessment requirements set out in paragraph 2 of Policy EI 2 are neither justified, effective nor consistent with national</p>	Having regard to the above, BYSS cannot support the inclusion of the proposed Employment and Industry Document within the local plan as it cannot be classified as sound in its current form. The	Comments noted. It is considered that Policy EI2 is sound and based on robust and credible evidence. For clarity Policy EI2, bullet point 2 is proposed to be altered due to a typo, the policy should require applications which	Amend second sentence of paragraph EI2.2 to read:  '...To ensure there is no detrimental impact on town

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									<p>policy. The sequential assessment procedure prescribed in the NPPF is provided to ensure development is appropriately located to protect vitality of town centres uses. The requirement for the sequential test on all B use class development, the majority of which fall outside the town centre use classification (as per the glossary of main town centre uses in the NPPF, page 53), results in an unsound policy that is not in accordance with the NPPF. It would not, for example, be appropriate for BYSS to provide a sequential assessment to demonstrate that B8 self storage use is appropriate in the Lombard Road/York Road Riverside Focal Point.</p> <p>A requirement to demonstrate that such a development would not impact on a town centre is unjustified and ineffective to the policy's objective of protecting town centre vitality. This is highlighted by the adopted Site Specific Allocations Document (2016) and the Lombard Road/York Road Riverside Focal Point SPD guidance adopted by the London Borough of Wandsworth in 2015. The guidance already recognises the appropriateness of B8 self storage use at York Road Business Centre. To further demonstrate impact of B8 self-storage use is ineffective as this would have been considered by LB Wandsworth when assessing the appropriateness of B8 self storage use at the allocated site.</p>	requirement for a sequential test to justify developments that would result in an increase in any B use class floorspace in a Focal Point should therefore be removed.	would result in a net increase in employment - use class B1a to demonstrate that there is no detrimental impact on the town centres.	centres, applications for developments that would result in a net increase in employment (use class B1a) floorspace will need to be justified by a sequential test.'
Unknown	Big Yellow Self Storage Company Ltd	Protected employment land and premises	Policy EI 3	1099383	Not Specified	Not specified	No	Not specified	BYSS considers that the limit of 300 sqm of A1 cumulative replacement floorspace per Focal Point as prohibitive to the fulfilment of the development requirements of the borough. It would impact the delivery of the Local Plan by preventing development that can be demonstrated as appropriate through a sequential assessment of town centre uses.	We therefore suggest amending the policy to allow development to exceed the 300 sqm limit if the development can demonstrate no harmful impact on town centres through a sequential assessment. This is in line with existing adopted Local Plan policies DMO 8, DMTS 2 and DMI 2.	Comments noted. No change required. Adopted Core Strategy policy PL8 Town and Local Centres and DMTS1 Town Centre Uses detail the council's position regarding the retail hierarchy to support town centres and protected frontages. The approach was evidence based tested and adopted at examination. Therefore the policy EI3 seeks	

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											to allow small scale retail but would not support larger increases as this could have a detrimental effect on the town centres.	
Unknown	Big Yellow Self Storage Company Ltd	Affordable, flexible and managed workplaces	Policy EI 4	1099383	Not Specified	Not specified	No	Not specified	<p>Emerging policy EI 4 also requires developers to comply with the Code of Leasing and Business Premises in England and Wales 2007. This Code is voluntary and should be treated as such. The inclusion of this restriction is too prescriptive, making the Local Plan unsound in that it is not positively prepared.</p>	<p>As per our representations to the Council in November 2016, 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 on flexible terms and/or design the workspace so it can be let in an affordable manner (e.g. micro office space).</p> <p>In the event that affordable workspace does become a requirement of all 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. 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</p>	<p>Comments noted. No changes required. The code of leasing and business premises in England and Wales 2007 provides a framework for tenants and it is important to ensure these guidelines are taken into account. This policy wording is carried forward from the extant policy DMI4 which was adopted in 2016 as part of the Development Management policies and is considered to still be applicable.</p> <p>Policy EI4 intends to provide more managed or affordable workspace. The requirements of the policy ensure that there is sufficient flexibility in how this is delivered. If the workspace can be designed to adhere to the criteria that ensures that it minimises overhead and upfront investment costs and the design provides business support for micro and small businesses then the policy can be achieved.</p> <p>The Lombard Road/ York Road SPD 2015 and Area Spatial Strategy considers the opportunities for cultural workspace, and these</p>	

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										<p>result of its design rather than how it is managed.</p> <p>In order to ensure that development proposals are deliverable we also suggest that policy EI4 should be amended to encourage sites within the Lombard Road/ York Road Focal Point to provide cultural workspace (rather than requiring them to). It is not clear that there is sufficient evidence to justify why the Lombard Road/ York Road Focal Point should be treated differently from other Focal Point sites (where cultural workspace is encouraged to be provided, rather than required).</p>	<p>designations and opportunities have been carried forward into the SSAD 2016 identified site allocations. These documents highlighted the importance of promoting cultural workspace within the area and creating a 'destination' quarter based on the arts and creative workspace.</p>	
Unknown	Big Yellow Self Storage Company Ltd	Requirements for new employment development	Policy EI 5	1099383	Not Specified	Not specified	No	Not specified	<p>Emerging Policy EI 5 requires proposals for B8 developments to have floor to ceiling heights of 3.35m. The floor to ceiling heights within BYSS stores however often vary between 3.05m and 3.24m. BYSS fully understand their operational requirements. They have been operating successfully and as noted above, have over 70 stores. We therefore suggest that this requirement is unnecessary and request that it is removed from the draft policy.</p>	<p>Emerging Policy EI 5 requires proposals for B8 developments to have floor to ceiling heights of 3.35m. The floor to ceiling heights within BYSS stores however often vary between 3.05m and 3.24m. BYSS fully understand their operational requirements. They have been operating successfully and as noted above, have over 70 stores. We therefore suggest that this requirement is unnecessary and request that it is removed from the draft policy.</p>	<p>Comment noted. It is considered that 3.35m is a standard height for Industrial uses, however it is acknowledged that where the buildings are being designed for specific end users this may require a slight deviation from the 3.35m height. A minor change is therefore proposed to the wording of the policy to accommodate this flexibility to accommodate a variation in height to suit the requirements of the user where justified.</p>	<p>Amend Policy EI5 (2) bullet point 2 to read:  Floor to ceiling heights of 3.35m <u>or similar where justified</u>;</p>
Unknown	Big Yellow Self Storage Company	Site allocations	4	1099383	Not Specified	Not specified	No	Not specified	<p>The BYSS York Road Business Centre site currently falls within a MUFIEA. Within this designation the principle of additional</p>		<p>Support welcomed. No changes required.</p>	

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	Ltd							d	<p>residential development as part of a mixed use scheme is acceptable, where replacement employment floorspace is provided as part of the proposals.</p> <p>We note that draft policy EI 3 continues to ensure that within Focal Points redevelopment of sites currently or most recently in industrial use must replace all commercial floorspace on the site. This requirement for the BYSS York Road Business Centre site is also already set out within the adopted Site Specific Allocations Document (2016) and the adopted Lombard/York Road Riverside Focal Point SPD (2015).</p> <p>The site therefore is highlighted as having 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. As such, BYSS are currently engaging in pre-application discussions with LBW regarding a mixed-use development to provide residential units, retail units, flexible studio/office space, and a new Big Yellow Self Storage store.</p> <p>BYSS welcome the removal of the 500sqm limit on B8 Use Class floorspace when replacing employment floorspace, as is currently required under the MUFIEA designation (Policy DM12).</p>			
Unknown	Hollybrook Ltd	Paragraph	1.57	1099417	Not Specified	Not specified	Not specified	Not specified	<p>The subject site is located within an area which has seen a significant transition in recent years from commercial and industrial uses to medium and high density residential uses, including the notable 21 storey scheme to the east of the site in Enterprise Way. The site is a significant landholding and one of the last remaining pockets of commercial space within what is now an established residential area. We</p>		Support welcomed. No change required.	

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									therefore support the retention of Site Allocation 45 and the intent for a mixed use development including employment floorspace, residential use and improvements to public realm.			
Unknown	Hollybrook Ltd	Protected employment land and premises	Policy EI 3	1099417	Not Specified	Not specified	Not specified	Not specified	The Site Allocation suggests that any future development should include replacement employment floorspace, and this is reiterated in proposed Policy EI 3 which requires the redevelopment of sites in current industrial use to replace all commercial space on site. Whilst we acknowledge the importance of retaining employment space, the existing uses on site are poor quality and contain relatively low employee numbers (currently approximately 23 employees although one tenancy which has 10 employees is vacating shortly). The redevelopment of the site provides the opportunity for the inclusion of higher quality and higher density employment space, particularly for SMEs, in line with draft Policy EI 2 which prioritises space for SMEs within the Wandsworth Riverside Quarter Focal Point of Activity.	Higher quality and higher density employment floorspace is considered to offset the need for a like for- like replacement of the existing floorspace, and on this basis we suggest that a much reduced target of floorspace be allowed for in the policies (on the basis that a higher density and quality of employment space is provided) rather than 100% floorspace replacement which is currently required.	Comments noted. No change required. The site allocation designation and policy EI3 are considered sound. The intention is to ensure that employment generating floorspace is not lost. A wide range of uses can be considered in the replacement floorspace and this approach is considered to be in accordance with the aims of the Focal Points which present opportunities for mixed-use development at higher densities to support the vitality and vibrancy of these areas.	
Unknown	Hollybrook Ltd	Area Spatial Strategy for Wandle Delta	Figure 7	1099417	Not Specified	Not specified	Not specified	Not specified	Figure 7 of the Employment and Industry Document identifies a spatial strategy which includes a 'suggested route' through the subject site connecting Osiers Road in the east to Knightley Walk to the west. We support the provision of a pedestrian only link (with allowance for emergency vehicle access) running east-west through the site and consider this an opportunity to provide increased permeability in the area.		Support welcomed. No change required.	
Unknown	Hollybrook Ltd	Site allocations	4	1099417	Not specified	Not specified	Not specified	Not specified	The Site Allocation suggests that any future development should include replacement employment floorspace, and this is reiterated in proposed Policy EI 3 which requires the redevelopment of sites in current industrial use to replace all commercial space on site. Whilst we acknowledge the importance of retaining employment space, the existing uses on site are poor quality and contain relatively low		Comments noted. No change required. Policy EI3 sets out that existing uses within the Focal Point of Activity can be replaced with town centre uses thereby giving flexibility within the Focal Point of Activity.	



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									employee numbers (currently approximately 23 employees although one tenancy which has 10 employees is vacating shortly). The redevelopment of the site provides the opportunity for the inclusion of higher quality and higher density employment space, particularly for SMEs, in line with draft Policy EI 2 which prioritises space for SMEs within the Wandsworth Riverside Quarter Focal Point of Activity.			
Unknown	Hollybrook Ltd	Site allocations	4	1099417	Not Specified	Not specified	Not specified	Not specified	9, 11 and 19 Osiers Road, SW18  Being located within a Focal Point of Activity and in close proximity to the River Thames and Wandsworth Town Centre, the site is ideally located for a tall building which will allow additional dwellings to be provided to contribute to meeting the Council's housing targets as set by the London Plan. A well designed tall building would integrate with the existing tall buildings in the surrounding area, and would not be visually dominant when viewed from the river due to the height of existing buildings to the north and east.		Comments noted. No change required. An application received for a tall building would be considered against the policy criteria of Development Management Policies Document Policy DMS4.	
Unknown	Style and Space Contractors Limited	Managing land for industry and distribution	Policy EI 6	1099427	Not Specified	Not specified	Not specified	Not specified	Policy EI 6 provides advice in regards to the management of land for industry and distribution. Policy advises what uses would be supported on LSIA's, however the existing use is not one of the protected uses - Class B1c, B2 or B8 developments are unlikely to come forward on the site.  Para 21 of the NPPF advises that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.  Additionally, para 22 states that planning policies should avoid long term protection of sites allocated for employment where there is no reasonable prospect of the site being used for that purpose, applications for alternative	The proposal is for the Penwith Road frontage to be removed from the Thornsett Road LSIA.	Comment noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The LSIA's serve an important function to provide land which main focus is for industry for the lifetime of the plan. It is acknowledged that although the LSIA's do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the areas,	

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									<p>uses of land or buildings should be considered on their own merits having regard to market signals.</p> <p>In addition to the above, policy EI 6 advises that 'LSIAs must provide full replacement of existing B1c, B2 or B8 floorspace'. Given that the existing use is none of these uses, it is considered that a LSIA release can be justified.</p>		<p>and instead bolster the employment generating potential of these areas, provide more varied local job opportunities</p> <p>The possible encroachment of residential uses into these industrial areas can harm their operation and limit their capacity and it is therefore crucial to protect the LSIA from non-economic uses. As a whole the LSIAs form the strategic reservoir of land that can be used primarily for industrial purposes.</p>	
Unknown	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Protected employment land and premises	Policy EI 3	1099460	No	No	No	No	<p>Whilst we support the strategic role of LSIAs, we consider that the site would be appropriate for alternative uses (including residential). The Proposed Submission Draft Local Plan Employment and Industry Document is therefore considered unsound as it does not represent the most appropriate strategy for the site, and does not promote sufficient flexibility.</p> <p>The site is located on the edge of the LSIA and is separated from the majority of the LSIA to the south by Kimber Road. The site is located adjacent to residential areas, sharing boundaries with residential properties to the north and northeast fronting Brathway Road, Avening Road and Cambourne Road. It is considered that the continued provision of industrial uses in this location comprises conflicting uses that are not appropriate adjacent to residential dwellings.</p>		<p>Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that</p>	

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											<p>where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-</a></p>	

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											<p><a href="#">base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to redesignation and intensification in accordance with this evidence.</p>	
Unknown	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Protected employment land and premises	Policy EI 3	1099460	No	No	No	No	<p>The site is a brownfield site in an accessible location. The site is located within a residential area, supported by good transport links and community facilities such as schools and open space, as well as local retail provision. The site is therefore considered to be a sustainable location for residential development. In addition, the site is not located within the designated Green Belt and is therefore preferable to other locations. Redevelopment of the site for residential development would contribute to addressing the chronic shortfall of housing in London.</p> <p>The site is owned by IPIF, a fund managed by Legal &amp; General which rents the units out to various tenants. Whilst these units are currently occupied, the site could be fully vacated within the near future. The site is therefore considered 'available' for comprehensive redevelopment within the next five years.</p>	<p>Whilst we support the objective to maintain and support the economic health of the borough, in light of the above, we consider the site to be more appropriate for an alternative residential land use to help meet local housing need. The site is located on the edge of the LSIA, is sustainable and accessible and is considered to be available for redevelopment for alternative uses in order to make the best and most efficient use of brownfield land, in accordance with national and regional planning policy. We would therefore recommend removing the LSIA designation from the site to allow the site to come forward for alternative uses.</p>	<p>Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and redesignation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to</p>	

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											<p>modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to</p>	

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											redesignation and intensification in accordance with this evidence.	
Ms Polly Barker	TfL Commercial Development	Protected employment land and premises	Policy E1 3	1098974	No	Not specified	Not specified	Not specified	<p>EL3 Part 6a</p> <p>Notwithstanding the previous comments, TfL CD generally supports the flexible approach of Policy E1 3 Part 6 Railway Arches, which applies a variation of the policy depending on their use and location. This non blanket approach to policy, recognising arch sites differ between them, is supported.</p> <p>TfL CD also strongly support Policy E1 3 Part 6a which states</p> <p>"The use of railway arches within town and local centres and the Central Activities Zone for all B class uses and town centre uses will be supported.."</p> <p>as we believe and agree that railway arches within town centres can contribute to the vitality of a town centre and wider place making opportunities;</p>	<p>...however to ensure absolute clarity as to what town centre uses refer to, TfL CD would like to amend the policy as follows:</p> <p>"The use of railway arches within town and local centres and the Central Activities Zone for all B class uses and town centre uses, as identified within the glossary of this document, will be supported."</p> <p>Particularly pertinent to the above emerging Policy, TfL CD is currently reviewing development opportunities at 39-44 Upper Richmond Road, East Putney for town centre uses. The arches have a busy high street location with high Public Transport Access Level of 6a (out of a range of 1 to 6 where 6 is considered as excellent). The surrounding area is largely residential, retail and office with the majority of buildings on Upper Richmond Road to the west having existing active frontages and the Putney Plaza proposal directly located to the east. The site is located within the Town Centre boundary and therefore town centre locations would be supported at this location</p>	Support welcomed. No change required.	

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										under Proposed Policy E1 3. TfL CD is keen to engage with the LB Wandsworth about proposals at 39-44 Upper Richmond Road from early stages.		
Ms Polly Barker	TfL Commercial Development	Protected employment land and premises	Policy E1 3	1098974	No	Not specified	Not specified	Not specified	<p>EL3 Part 6d</p> <p>In response to Policy E1 3 Part 6d TfL CD acknowledges the need to protect B-class use within arches elsewhere in the Borough although the need to be more flexible in this policy approach should be considered.</p>	<p>TfL CD recommends that all B-class uses should be supported within arches regardless of current use and that the following changes to Policy E1 3 Part 6d be therefore made:</p> <p>Elsewhere, the use of railway arches for B class uses will be supported. Those that are in industrial use should continue to provide B-Class, B1c, B2, B8 or industrial sui generis uses unless there is no demand for industrial use of the premises. Non B class uses of railway arches will only be supported if there is no demand for B class use of the premises.</p> <p>Failure of not amending this policy to reflect the above will restrict the ability for B1 uses within the arches. This is not considered in line with NPPF Para 21 which requires policies and plans to "be flexible enough to accommodate needs not anticipated in the plan and to allow rapid response to</p>	<p>Comments noted. No changes required. It is considered that Policy E13 is sound and based on robust and credible evidence. The policy currently allows for B class uses but states that where industrial uses are in place they should continue. Industrial land needs to be protected and this policy seeks to ensure existing industrial uses continue. By adding the wording 'B class' to the policy to describe industrial uses is not correct as industrial uses are B1c, B2 and B8. It is considered there is flexibility within the policy to allow B1 uses within arches and to provide for SME and start up businesses.</p>	

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										<p>changes in economic circumstances", in addition to London Plan Policy 4.1 which seeks availability of sufficient workplaces in terms of type and size to ensure strong and diverse economy.</p> <p>Railway arches make good spaces for SME and start-up businesses therefore under this existing wording, the current policy could restrict opportunities for these businesses to expand or develop in these areas. This could have damaging impact on creative industries which LB Wandsworth has identified as growing sector, strongly represented within Wandsworth's economy. The ELPS (2016) report clearly demonstrates demand for small premises from the creative and cultural sectors and states that there is potential for redevelopment of arches for use for small office or SME purposes rather than industrial and that this can have beneficial impacts of reducing vehicle traffic and parking issues. This is particularly pertinent at TfL arches at Winthorpe Road.</p>		
Mr Philip Sherrell	Unknown	Protected employment land and premises	Policy EI 3	1098727	No	Not specified	No	No	The Jaggard's Way site provides a valuable community function, housing local businesses and employing local people. The area does not need more housing - public transport is already seriously overstretched - but it has very few	Step 1: Before allowing any change of use for Jaggard's way [there] should be a proper and full local consultation with residents	Comments noted. The policy is considered to be sound and based on a robust and credible evidence base. These comments relate to a planning	Amend wording at first sentence of EI5.1 to read:  'New developments



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									spaces to allow local entrepreneurs to set up and grow small businesses. Losing the industrial units on Jaggard's Way would seriously harm the cultural and economic diversity of the area. There has also been no meaningful consultation at all.	and business owners	<p>application and this is to be considered separately to the local plan. However, the comments are noted in relation to the policy and it is considered that a clarification is required. The intention of policy E13 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy E15 which seeks any redevelopment to retain existing businesses on site following development, with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.</p> <p>The site is located at a transport node (Wandsworth Common Rail Station) and any proposed development would need to address any infrastructure capacity issues accordingly.</p> <p>The Planning Service maintains a database of statutory (specific consultation bodies and duty to co-operate bodies) and non-statutory consultees. It is the</p>	for economic uses must provide a good standard of <del>accommodation and be suitable flexible</del> workspace which would allow for a range of unit sizes for use by a wide range of occupiers.'

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											responsibility of an interested non-statutory party to notify the council to be put onto the database. Over 1,000 consultation letters/e-mails were sent to individual and organisations to notify them of the consultation period and to let them know where to find further information and how to make representations. There have been 2 previous rounds of public consultation on the Local Plan Employment and Industry Document.	
Mr Mark Robinson	Unknown	Protected employment land and premises	Policy EI 3	1098733	No	Yes	Yes	Yes	I am very supportive of the designation for Jaggard Way to be allocated and protected for employment use. There are decreasing numbers of areas where local business can work from and the loss of this area would effect well established local business of community and amenity value including a gym and a brewery. Hundreds of local jobs would be lost that support other local businesses such as shops and restaurants. Due to the light industrial uses, I do not consider that "commercial" space under a proposed residential development would be a suitable replacement. I would urge the council to issue an Article 4 Direction to remove the permitted development rights that are likely to be pursued by the owners.		Support welcomed. No change required. The intention of the policy is to ensure that office and industrial floorspace is not lost as part of a re-development scheme. If a mixed use application was submitted policy EI5 would also apply which requires the design to be suitable for modern business needs and new employment floorspace must be designed to mitigate any conflict of use.	
Mr James Smith	Tonsley Residents' Association	Local Plan - Employment and Industry Document - proposed submission version - March 2017		834	Not Specified	Not specified	Not specified	Not specified	Our view is that the strategy would need to ensure that proposed future developments across any new areas designated will be compelled to adhere from the outset (i.e. when developers' initial plans are still embryonic and first submitted to the Council), to national and local guidelines relating to height and density. This also means that the strategy itself would need to be in line with the national framework		Comments noted. No change required. The purpose of the document is to inform the future approach to the provision, protection, release and enhancement of employment land and premises. This comment is largely regarding process and	

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									<p>on both these matters.</p> <p>This is very important in order to avoid the kind of fiasco, and monumental waste of resources all round that is currently happening for example, in relation to the re-submitted plans for the Homebase site following the original planning application having been rejected last Summer. I have not expanded further on this as all key members of the Council Planning Committee are fully aware of the concerns raised by the wider community through recent discussions at the Councillors' public meeting held earlier in the year at St Anne's Church Hall. Relevant details would of course be recorded in the minutes of that public forum, however, should you require further clarification, please do not hesitate to contact me if necessary.</p>		does not concern the content of the LPEID.	
MR James Markham	Unknown	Protected employment land and premises	Policy EI 3	1098715	Not Specified	Yes	Yes	Yes	<p>Along with other local people, I have a concern about the potential development of the industrial units on Jaggard Way, SW12. These businesses employ local people. If the development proceeds, there are very few, if any, other industrial units for them to relocate to which could not only impact on the loss of employment in the local area but could also have a terminal impact on what are small businesses.</p> <p>The area already has a very high proportion of residential properties. Any more would add to struggling transport links. The area is already quite transient, with the vast majority of local residents commuting into central London for work. Having a variety of uses for properties adds to the community, particularly by generating employment.</p>	I would urge the council to take these factors into consideration when considering any application for redevelopment	Comments noted. The policy is considered to be sound and based on a robust and credible evidence base. These comments relate to a planning application and this is to be considered separately to the local plan. However, the comments are noted in relation to the policy and it is considered that a clarification is required. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy EI5 which seeks any redevelopment to retain existing businesses on site following development, with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to	Amend wording at first sentence of EI5.1 to read:  'New developments for economic uses must provide a good standard of <del>accommodation and</del> <u>be suitable flexible workspace which would allow for a range of unit sizes for use by a wide range of occupiers.'</u>

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											<p>also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.</p> <p>The site is located at a transport node (Wandsworth Common Rail Station) and any proposed development would need to address any infrastructure capacity issues accordingly.</p>	
MR Gary Collins	Unknown	Protected employment land and premises	Policy EI 3	1098720	Not Specified	Not specified	No	Not specified	The businesses in Jaggard way are an important part of the community and it is vital to preserve local employment in an area where there is little industrial activity.		Comments noted. No change required. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floor space, the policy also cross refers to policy EI5 which seeks any redevelopment to retain existing businesses on site following development, with similar rent terms and level, if the businesses wish to remain. Therefore, the policy seeks to retain the local employment and businesses.	
Mr Dietmar Kuchemann	Unknown	Protected employment land and premises	Policy EI 3	1098712	No	Not specified	No	Not specified	<p>I am concerned that we are losing diverse amenities in Wandsworth, many of which are being replaced by unsound housing developments, i.e. developments that don't benefit the community (beyond the taxes they might generate).</p> <p>I am particularly concerned about the proposed development of Jaggard Way near Wandsworth Common Railway Station. The units there provide a substantial amount of local</p>	Leave Jaggard Way as it is now...	Comments noted. The policy is considered to be sound and based on a robust and credible evidence base. These comments relate to a planning application and this is to be considered separately to the local plan. However, the comments as noted in relation to the policy require a change to the Economic Protection	Amend wording at first sentence of paragraph EI5.1 to read:  'New developments for economic uses must provide a good standard of accommodation and be suitable flexible

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									<p>employment as well as providing useful services to the local community. We don't need the kind of housing development that is being proposed there - a development that is motivated purely by the hope of financial gain (aka greed).</p> <p>It is also a development whose physical scale will oppress the houses on Wexford and Ravenslea Roads.</p>		<p>Areas EI3. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floor space, and if the mix of uses can be successfully achieved on site in accordance with EI5. Policy EI5 also aims to retain existing businesses on site following development, with similar terms and rent levels, if those businesses wish to remain. Therefore, the policy seeks to retain the local employment and businesses. The site is located at a transport node (Wandsworth Common Rail Station) so any proposed residential units should take this into account and the application should be assessed accordingly. However it is considered that this position could be strengthened by considering the scale and type of premises for a wide range of business occupiers.</p>	<p><u>workspace which would allow for a range of unit sizes for use by a wide range of occupiers.'</u></p>
Mr David Wilson	Thames Water	Waste	Policy EI 8	233822	Not Specified	Not specified	Not specified	Not specified	<p>Thames Water consider that the Local Plan: Employment and Industry Review, should include specific text covering the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).</p> <p>Such a policy is required to ensure the infrastructure is provided in time to service development to avoid unacceptable impacts on the environment such as sewage flooding of</p>	<p>In order that the Local Plan is effective and compliant with national planning policy and guidance, Thames Water consider that text along the following lines should be added to the Local Plan Review :</p> <p>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers</p>	<p>Comments noted. The Site Specific Allocation Document (March 2016) sets out this policy requirement on page 6 and this covers all site allocations. In addition, paragraph 2.56 from the Development Management Policies Document sets out the proposed wording in policy. No change required.</p>	

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									residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness" for Local Plans.	will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered."  Such a policy/supporting text is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades. In some circumstances it may be necessary to apply a planning condition on the new development to ensure that the infrastructure upgrades are in place ahead of occupation of the development.		
Mr Charles	Environment Agency	Paragraph	1.34	219954	Not Specified	Yes	Yes	Yes	The Technical Guide to the National Planning Policy Framework (paragraph 9) states that those proposing developments should take advice from the emergency services when		Comments noted. No change required. When considering a planning application the Council would expect to consider	

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Muriithi									<p>producing an evacuation plan for the development as part of the flood risk assessment.</p> <p>In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.</p>		<p>details of emergency planning and rescue implications set out in a site specific Flood Risk Assessment, this is usually set out in a evacuation plan. The design of the building would also be considered in light of this in accordance with adopted Development Management Policies Document Policy DMS1 - General development principles - Sustainable urban design and the quality of the environment.</p>	
Mr Charles Muriithi	Environment Agency	Paragraph	1.57	219954	Not Specified	Yes	Yes	Yes	<p>Under the Environmental Permitting (England and Wales) Regulations 2016, you must submit plans to the Environment Agency and apply for a FRAP if you want to do work:</p> <p>In, over or under a main river Within 8m of the bank of a main river, or 16m if it is a tidal main river.</p> <p>Within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river</p> <p>Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment. You should apply for a Bespoke FRAP if your work cannot be classified as one of the following: an 'excluded' activity, an 'exempt' activity or a 'standard rules' activity.</p>		<p>Comments noted. No change required. Plans would be submitted at application stage and then assessed. The Council recognises these points elsewhere in Policy DMS 5 of the Local Plan Development Management Policies Document 2016.</p>	
Mr Charles Muriithi	Environment Agency	Site allocations	4	219954	Not Specified	Yes	Yes	Yes	<p>Any sites taken forward need to comply with Policy DMS 5: Flood Risk Management of the Wandsworth Local Plan adopted March 2016. Any site specific Flood Risk Assessments are required to assess both tidal (River Thames) and fluvial (River Wandle) flood risk and the</p>		<p>Comments noted. No change required. Upon consideration of a planning application the Council would expect to see details of tidal and fluvial flood risk and consideration of flood</p>	

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									location / proximity of the tidal flood defences. We are currently updating our current Tidal Thames Breach Modelling.		defences contained within a site specific flood risk assessment.	
Mr Charles Muriithi	Environment Agency	Site allocations	4	219954	Not Specified	Yes	Yes	Yes	<p>Site / Constraints</p> <p>Causeway Island including land to the east, SW18 / Tidal Flood Zone 3 &amp; Impacts on structure, height and maintenance of the associated river walls.</p> <p>Hunts Truck, adjoining sites including Gasholder, Armoury Way, SW18 / Tidal Flood Zone 3, Fluvial Flood Zone 2, Tidal Defence – any works to implement requirements of TE2100 and future maintenance &amp; Further investigation required to confirm Flood Zone designation.</p> <p>Keltbray Site, Wentworth House &amp; adjacent land at Dormay Street, SW18 / Tidal Flood Zone 3, Fluvial Flood Zone 2, Tidal Defence – any works to implement requirements of TE2100 and future maintenance &amp; Further investigation required to confirm Flood Zone designation.</p> <p>Frogmore Depot / Tidal Flood Zone 3, Fluvial Flood Zone 2, Tidal Defence – any works to implement requirements of TE2100 and future maintenance &amp; Further investigation required to confirm Flood Zone designation.</p> <p>Panorama Antennas, SW18 / Tidal Flood Zone 3, Fluvial Flood Zone 2, Tidal Defence – any</p>		Comments noted. No change required. Upon consideration of a planning application the Council would expect to see details of the various flood risk constraints contained within a site specific flood risk assessment.	



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									<p>works to implement requirements of TE2100 and future maintenance, Further investigation required to confirm Flood Zone designation</p> <p>Ferrier Street / Tidal Flood Zone 3, Fluvial Flood Zone 2 &amp; Further investigation required to confirm Flood Zone designation</p> <p>Putney Bridge Road (HSS Hire), SW18 / Majority Flood Zone 1, Borders Tidal Flood Zones 2/3 and Fluvial Flood Zone 2</p> <p>Wandsworth Riverside Quarter, Point Pleasant, SW18 / Tidal Flood Zone 2/3, Fluvial Flood Zone 1 &amp; Tidal Defence – any works to implement requirements of TE2100 and future maintenance</p> <p>This site has already been developed?</p> <p>9, 11 and 19 Osiers Road, SW18 / Tidal Flood Zone 2/3</p> <p>Linton Fuels site, Osiers Road, SW18 / Flood Zone 1, Tidal Defence – any works to implement requirements of TE2100 and future maintenance</p> <p>Feather's Wharf / Tidal Flood Zone 3, Fluvial Flood Zone 2, Tidal Defence – any works to implement requirements of TE2100 and future maintenance &amp; Further investigation required</p>			

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									<p>to confirm Flood Zone designation.</p> <p>Land at the Causeway, SW18 / Tidal Flood Zone 3 &amp; Impacts on structure, height and maintenance of the associated river walls.</p> <p>Cory Environmental Materials, Recycling Facility, Smugglers Way, SW18 / Tidal Flood Zone 2, Borders Tidal Flood Zone 3 &amp; Borders Fluvial Flood Zone 2</p> <p>Western Riverside Waste Transfer Station, SW18 / Tidal Flood Zone 2/3, Borders Fluvial Flood Zone 2 &amp; Tidal Defence – any works to implement requirements of TE2100 and future maintenance</p> <p>Homebase, Swandon Way, SW18 / Tidal Flood Zone 2/3 &amp; Flood Zone 2 Fluvial</p> <p>B and Q, Smugglers Way, SW18 / Tidal Flood Zone 2, Borders Tidal Flood Zone 3 &amp; Borders Fluvial Flood Zone 2</p> <p>McDonalds, Swandon Way, SW18 / Tidal Flood Zone 3 &amp; Fluvial Flood Zone 2</p> <p>Mercedes Benz and Bemco, Bridgend Road, SW18 / Tidal Flood Zone 3 &amp; Fluvial Flood Zone 2</p>			

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									<p>Wandsworth Bridge Roundabout, SW18 / Tidal Flood Zone 3 &amp; Fluvial Flood Zone 2 and 1</p> <p>Wandsworth Bus Garage, SW18 / Tidal Flood Zone 3 &amp; Fluvial Flood Zone 2 and 1</p> <p>Pier Wharf, SW18 / Tidal Flood Zone 3, Fluvial Flood Zone 2 &amp; Tidal Defence – any works to implement requirements of TE2100 and future maintenance</p> <p>Chelsea Cars and KwikFit, Armoury Way, SW18 / Borders Tidal Flood Zone 2 &amp; Borders Fluvial Flood Zone 2</p>			
MR Anthony Maxwell	Unknown	Protected employment land and premises	Policy EI 3	1098700	Not Specified	Not specified	No	No	<p>I understand there are plans to redevelop the industrial estate on Jaggard Way into yet more luxury flats. I oppose this on the basis that these businesses, even though not on the "High Street" form an integral part of the community. They are also businesses that are not in the mainstream, have been nurtured and grown by entrepreneurs and of course also provide much needed local employment.</p> <p>I hope that you agree, that going ahead with this proposed development would not only put further pressure on the local infrastructure but ruin an essential part of the community in Wandsworth. This piece of land, and the businesses there, are tucked away from the spotlight, but that in no way lessens their value to the community.</p>	Not to develop the proposed site.	Comments noted. The policy is considered to be sound and based on a robust and credible evidence base. These comments relate to a planning application and this is to be considered separately to the local plan. However, the comments are noted in relation to the policy and it is considered that a clarification is required. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy EI5 which seeks any redevelopment to retain existing businesses on site following development,	Amend wording at first sentence of EI5.1 to read:  'New developments for economic uses must provide a good standard of <u>accommodation and be suitable flexible workspace which would allow for a range of unit sizes</u> for use by a wide range of occupiers.'

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											<p>with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.</p> <p>The site is located at a transport node (Wandsworth Common Rail Station) and any proposed development would need to address any infrastructure capacity issues accordingly.</p>	
Mr Andree Gregory	Highways England	Local Plan - Employment and Industry Document - proposed submission version - March 2017		1098975	Not specified	Not specified	Not specified	Not specified	Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). Having examined the above documents, we do not offer any comments at this time.		Comments noted. No change required.	
Mark Smith	London Square	B&Q, Smugglers Way, SW18		1025077	Not Specified	Yes	Yes	Yes	<p>This site has been identified as falling within the Site Allocation 53 B&amp;Q Smugglers Way SW18.</p> <p>We welcome the revisions made within the Proposed Submission Version, March 2017 document, and would like to make the following comments.</p> <p>we support the site's removal from the Locally Significant Industrial Area allocation. We also support the site allocation for mixed use development including residential with some</p>		Support noted. No changes required.	

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									<p>economic uses. As the current use of the site is A1 and the site lies in the Thames Policy Area outside a focal point of activity, it is seen to be suitable for residential development.</p> <p>This Spatial Strategy indicates new "suggested routes" across Site Allocation 53 and we are supportive of this vision.</p>			
Lydia Investment Holdings	Chelsea Cars and Kwikfit	Local Plan - Employment and Industry Document - proposed submission version - March 2017		1099436	Not Specified	Not specified	Not specified	Not specified	<p>We are supportive that any redevelopment of the site should include provision of a new route through the site from Armoury Way to Wandsworth High Street. This would allow the site to be opened up and become more connected to the town centre and therefore encourage pedestrian movement and revitalise this area of Wandsworth Town Centre.</p>		Comments noted. No change required.	
Lydia Investment Holdings	Chelsea Cars and Kwikfit	Locations for new employment floorspace	Policy EI 2	1099436	Not Specified	Not specified	Not specified	Not specified	<p>Within the document the site is proposed to be designated as an 'Economic Use Intensification Area' in accordance with Policy EI2. We welcome this as it seeks to encourage development on site, however a balance would need to be struck in regards to the specifics of how economic use can be increased on site, as measuring an increase in only floorspace could restrict sites coming forward as some employment generating uses provide a higher employment density than others. We would therefore request that intensification of employment on sites is measured by jobs rather than floorspace. Additionally, we support the recognition in policy that in such areas other uses such as residential would be required to allow intensification of economic uses on site to come forward.</p> <p>We admire the efforts to increase employment use on site through the site designation (Ref 35A) within the EILP, however it is considered the re-provision of employment uses and the aspiration for an increase in employment on site should be based an equivalent number of jobs and not an equivalent quantum of floorspace. Uses such as SME workspace/office</p>		Comments noted and support welcomed. No change required. Whilst the council notes the importance of job creation, the main thrust of the policy is to protect and to intensify economic floorspace. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the	

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									premises would have a higher employment density than the existing sui generis use, or other uses within the B2/B8 Use Class. An arbitrary figure of 25% would place an unnecessary restriction in bringing the site forward for redevelopment, as an increase in employment on site could be met but the arbitrary 25% increase in floorspace is unable to be met.		<p>release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS.</p> <p>It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a></p> <p>The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>	

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Lydia Investment Holdings	Chelsea Cars and Kwikfit	Protected employment land and premises	Policy E13	1099436	Not Specified	Not specified	Not specified	Not specified	We are supportive of the aspiration to provide 'B Use Class and Sui Generis Uses' on site and recognise the Council's aspiration to meet the Borough's need of SME's and Cultural Work spaces.		Support welcomed. No change required.	
Lydia Investment Holdings	Chelsea Cars and Kwikfit	Paragraph	3.12	1099436	Not Specified	Not specified	Not specified	Not specified	In regards to tall buildings, it is recognised that the site designation does not comment specifically on the appropriateness of tall buildings on site and advises that this should be dealt with by adopted policy DMS4. However, in order to meet the requirements of the site allocation and provide a mix of uses on site a building taller than 6 storeys would need to be considered. The provision of a tall building on site would allow for substantial investment for the redevelopment of this dilapidated site in the Town Centre, create better pedestrian linkages, provide the opportunity to improve public realm and provide a landmark building that would make a positive contribution to the townscape. A new tall building of very high architectural quality in this location would revitalise and regenerate an area of Wandsworth Town Centre that is undistinguished and suffers from a poor and incoherent streetscape and character.		Comments noted. No change required. Adopted Local Plan Development Management Policies Document DMS4 would be considered. The criteria of Part b of Policy DMS4 would be applied by the Council if an application was considered for a building of 6 storeys and above.	
Lydia Investment Holdings	Chelsea Cars and Kwikfit	Site allocations	4	1099436	Not specified	Not specified	Not specified	Not specified	It is recognised that the site allocation advises that a retail-led development would not be supported on site as it would compete with frontages on Wandsworth High Street. As part of the evidence base of information gathered for the EILP there has been no assessment of retail provision within town centres, most importantly the impact of the provision of retail uses on this site could have on the town centre.  We would advise that provision of retail use on site should be led by an evidenced based approach and be on a case by case basis with the applicant being required to demonstrate the impact of the proposed uses on the viability		Comments noted. No change required. Adopted Core Strategy policy PL8 Town and Local Centres and DMTS1 Town Centre Uses detail the council's position regarding the retail hierarchy to support town centres and protected frontages. The approach was evidence based tested and adopted at examination. Whilst it is considered that a retail-led development would not be supported, small scale uses may be appropriate which are	

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									and vitality of the town centre according with national policy. Local Policy encourages a mix of uses within the Town Centre and the restriction of uses on sites should be led by an evidence based approach as this could restrict the potential of a site coming forward for redevelopment. Additionally, such a restriction in use fails to see the potential future benefits a particular use may have on the town centre in the absence of any evidence.		consistent with the council's adopted Local Plan approach and policies. The site is allocated for mixed use development which would not preclude the site coming forward for other uses in accordance with the Local Plan in addition to residential and economic uses, where appropriate. Therefore, no change is considered necessary.	
Lydden Group Limited	Unknown	Paragraph	1.49	1114805	Not Specified	Yes	No	Yes	<p>... we feel that an integrated comprehensive and forward thinking concept masterplan for the whole of the estate is an essential requirements to achieve the optional result for Wandsworth.</p> <p>We feel that segregating the Workspace "zone" from the balance of the overall district does not result in a sound urban design solution. The stated goals of Wandsworth (and the Spatial Strategy) together with RTPI Best Practice Guidance have been the first principals utilised in developing our strategy and our initial concept thinking for cohesive overall spatial strategy and outline masterplan.</p>		Comments noted. No change required. It is acknowledged that a masterplan may be appropriate if the whole of the LSIA was considered to be suitable for mixed-use development. However, the Council considers the more limited re-designation of the LSIA to be a sound approach as set out in the LPEID on protecting and re-designation of employment land. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The	



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											<p>Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-</a></p>	

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											<a href="#">review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.	
Lydden Group Limited	Unknown	Locations for new employment floorspace	Policy EI 2	1114805	Not Specified	Yes	No	Yes	<p>In addition to the many representations put forward regarding the appropriate policy and employment findings, we feel that an integrated comprehensive and forward thinking concept masterplan for the whole of the estate is an essential requirements to achieve the optional result for Wandsworth.</p> <p>We feel that segregating the Workspace "zone" from the balance of the overall district does not result in a sound urban design solution. The stated goals of Wandsworth (and the Spatial Strategy) together with RTPI Best Practice Guidance have been the first principals utilised in developing our strategy and our initial concept thinking for cohesive overall spatial strategy and outline masterplan.</p>	<p>We believe an integrated, mixed use Bendon Valley Lydden District that offers the expansive London creative engine a home as well, is the optional solution for Wandsworth. The UK Arts Council representation encourages "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.</p>	<p>Comments noted. No change required.</p> <p>In relation to the segregation of the Bingo Hall and Riverside studios area and why this has been removed from the LSIA this has arisen from the ELPS evidence which states;</p> <p>'Cluster C6 similarly comprises medium and large sized warehouses along Bendon Valley and Lydden Road, and small office units, studios, and some small light industrial space within the Riverside Business Centre.</p> <p>.....Premises within all three clusters appear to be well used and have been adapted to be fit for purpose, with few vacancies. The 'Flip Out' trampoline park on Bendon Valley (formerly Mecca Bingo) could provide an opportunity for intensification and</p>	

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											<p>redevelopment, and includes a large car park.'</p> <p>The emerging policy allows for the southern part of the LSIA area to be mixed use but this is on the basis that there will be an intensification of use of industrial and office floorspace by at least 25%.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to</p>	

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											<p>modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-</p>	

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											designation and intensification in accordance with this evidence.	
Lucy Owen	Port of London Authority	Paragraph	1.58	1405	No	Yes	No	Yes	The text at 1.58 that the Thames is a working river and there are five safeguarded wharves along the Wandsworth stretch of the river Thames is welcomed. It would be useful if additional text was added to 1.58 to deal with the complex juxtaposition of issues that are associated with having residential development located in close proximity to a safeguarded wharf. The document should be clear that the wharves are safeguarded by Ministerial Direction and planning policy protects them for waterborne cargo handling uses. Any development that is proposed in close proximity to a safeguarded wharf should be designed to minimise the potential for conflicts of use and disturbance.	Include additional text at 1.58 to deal with the complex juxtaposition issues that are associated with having residential development located in close proximity to a safeguarded wharf: wharves are safeguarded by Ministerial Direction and planning policy protects them for waterborne cargo handling uses. Any development that is proposed in close proximity to a safeguarded wharf should be designed to minimise the potential for conflicts of use and disturbance.	Comments noted. No change required. Whilst the Council recognises the change identified by the PLA, the purpose of paragraph 1.58 is simply to describe Wandsworth's economic geography; not to recognise issues with incompatible development. The Council recognises these issues elsewhere in Policy DMI 3 of the Local Plan 2016.	
Lucy Owen	Port of London Authority	Paragraph	2.47	1405	No	Yes	No	Yes	Policy E11 protects safeguarded wharves and the policies advises that policies E13, E16, E17, E18 and E19 set out how this will be achieved. Policy E19 deals specifically with protected wharves. It includes the correct test: that the loss of a wharf will not be permitted unless it is demonstrated that the wharf is no longer viable or capable of being made viable for cargo handling. The policy must however go further than it does. At the moment it states that at Cringle Dock and Kirtling Wharf any proposal for mixed use development must ensure that it does not have a negative impact on the operation of the safeguarded wharf but the policy requirement is to ensure that any development whether it is a Cringle Dock, Kirtling or adjacent or opposite any of the Borough's 5 safeguarded wharves is designed to minimise the potential for conflicts of use and disturbance. The PLA's concerns about	The supporting text to policy E19 is concerning, seemingly prioritising the Nine Elms strategic objectives potentially at the expense of safeguarded wharves: 'flexibility in the application of this policy will be applied.' Policy 7.26 of the London Plan is a protective policy, It is there to prevent wharves from being lost to higher value land uses and maintain a critical number of wharves for the transport of cargoes by water. Applying policy E11 flexibility runs the risk of wharves being lost, contrary to policy. Paragraph 2.47	Comments noted. No change required. The text of Policy E19 and paragraph 2.47 has been duplicated from the existing adopted Development Management Policies Document Policy DMI 3 (c) and paragraph 5.19. It is considered that Policy E19 is sound and based on robust and credible evidence. The Policies concerning safeguarded wharves will be reviewed when the Council reviews the full Local Plan.	

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									policy PL9 are well documented and are not repeated here but the introduction of sensitive non-waterborne freight uses as part of a mixed use scheme raises an objection in principle with respect to London Plan Policy 7.26. Whilst maintain appropriate access and operational capacity is crucial, the Council will know from the Cringle Dock applications that the issues extend far beyond access and capacity. Policy EI9 needs to include a reference to noise, air quality (dust and odour) and lighting.	must be amended removing any reference to flexibility.		
Katharine Fletcher	Historic England	Waste	Policy EI 8	869674	Not Specified	Not specified	Not specified	Not specified	In view of the nature of waste management developments we recommend that the relevance of considering the setting of heritage assets is recognised, as this encompasses matters such as noise, dust, fumes or vibration as well as the potential visual impact that may result from such facilities	<p>- Part 6, iv) - amend to read 'the site does not contain or adversely affect the setting of heritage assets'</p> <p>- Part 7, vii) – amend to read 'sites which contain no archaeological features and do not adversely affect heritage assets or their settings'</p> <p>- Part 9, vi) – amend to read 'the impact of development on heritage assets or their settings'</p>	<p>Comments noted. The Council agrees with the suggested amendment to policy EI8 and a minor change is therefore proposed to take into account heritage assets. The minor changes will read as follows:</p> <p>Part 6 (iv): 'Is proposed on a site meeting the following locational criteria: The site is not within, or partly within, nature conservation areas protected by current international and national policy; and the site does not contain <u>or adversely affect the setting of heritage assets</u>'</p> <p>Part 7 (vii) : '<u>sites which contain no archaeological features and do not adversely affect heritage assets or their settings</u>'</p> <p>Part 9 (vi): '<u>the impact of development on heritage assets or their settings</u>'</p> <p>Although waste policies are not being reviewed as part of the plan, these changes are considered as minimal and considered acceptable.</p>	

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Katharine Fletcher	Historic England	Waste	Policy EI 8	869674	Not Specified	Not specified	Not specified		<p>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. In this way heritage-led regeneration can take place whereby the historic significance of sites is conserved and enhanced (London Plan policy 7.9) and the plan actively promotes a positive strategy for the historic environment (para 126, NPPF). There will be further work for developers of some sites to ensure that their proposals are based on an understanding of heritage assets within and around the land concerned.</p> <p>Historic England welcomes the Council's identification of specific designated heritage assets in the historic environment section for the sites. However, we would like the Design Principles in the policy to refer to how these heritage assets should be conserved and, where appropriate, enhanced in the design of new development. This has been referenced, for instance, within policies for site 54, Swanton Way, and site 55, Bridgend Road, but not in other cases such as site 43, Wandsworth Riverside and site 48, Feather's Wharf.</p> <p>Similarly, many of the sites lie within Archaeological Priority Areas (APAs) and we support the identification of these within the site descriptions. However, for clarity, and to ensure effectiveness, it is important to indicate within the policies what action will be required in terms of the archaeological interest. This may be by specific reference to appropriate levels of evaluation and recording, depending on the likely significance of the deposits. All policies affecting APAs should reference the Council's overarching policy on archaeology.</p> <p>Information in Conservation Area Appraisals (CAAs) and Management Plans can assist in</p>		Comments noted. It is considered that Policy EI8 is sound and based on robust and credible evidence. The specific sites mentioned within the representation will be assessed accordingly by Wandsworth Borough Council's Conservation and Urban Design Team, in consultation with Historic England to ensure appropriate redevelopment of these sites occur.	

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									providing assessments of significance and how this should be managed in the context of new development. In the case of sites lying within conservation areas, or adjacent to them, Historic England recommends that reference is made to the appropriate CAA to ensure a clear and effective approach to conservation and enhancement as part of a positive strategy for the historic environment. This applies, for example, to site 35A Armoury Way, p101/2, site 41, Gasholder site, p59/60, site 42 Wentworth House and Dormay Street, p62 and site 42A Frogmore Depot and Site 42B Panorama Antenas, p67			
Katharine Fletcher	Historic England	Wandsworth Bus Garage, Jews Row, SW18		869674	Not Specified	Not specified	Not specified	Not specified	Wandsworth Bus Garage, p97, Policy Map ref 57  The bus garage is a grade II listed building. We note that the policy contains reference to the significance of different parts of the building. Historic England can advise further if required and, in any event, we expect the significance of the listed building to be conserved and as opportunities arise, enhanced.		Comments noted. No changes required.	
Julietta McLoughlin	Greater London Authority	Local Plan - Employment and Industry Document - proposed submission version - March 2017		1098983	Not specified	Not specified	Yes	Yes	General  The LPEID sets out a plan for effective management of industrial and employment land to ensure there is sufficient stock to meet the borough's and London's future needs for different types of industrial and related uses, in line with London Plan policies 2.17, 4.4 and the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG).  The LPEID sets out a clear and consistent approach to protecting and promoting industrial and employment land in the borough with sufficient supporting evidence to justify industrial land release and policies and it is therefore considered to be in general conformity with the London Plan.		Comments noted. No change required.	
Julietta	Greater	Local Plan -		1098983	Not	Not	Not	Not	The GLA have responded to further		Comments noted. No change	



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McLoughlin	London Authority	Employment and Industry Document - proposed submission version - March 2017			Specified	specified	specified	specified	<p>correspondence from the council, who sought comments on the Plan in light of the GLA's publication of London Industrial Land Demand Study (2017).</p> <p>Emerging evidence in the London Industrial Land Demand Study 2017 suggests that Wandsworth may need to increase floorspace capacity for industry and warehousing over the coming plan period. This should be achieved through intensification and more efficient use of land. The increase in floorspace capacity will also need to be considered in light of the London Strategic Housing Land Availability Assessment (SHLAA) and capacity for new housing, with a balanced approach to increasing housing while at the same time protecting industrial land.</p>		required. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence. The approach taken will increase the overall housing offer in accordance with the SHLAA.	
Julietta McLoughlin	Greater London Authority	Paragraph	1.53	1098983	Not Specified	Not specified	Yes	Yes	The release of industrial land at Nine Elms which is already in the pipeline and some smaller sites near the Thames as well as some further release of local strategic industrial sites is supported, provided that support and uplift is given to industrial capacity through intensification of existing SIL and industrial sites falling outside the CAZ.		Support welcomed. No change required. The Council considers that the approach set out in the LPEID will result in increased industrial capacity through intensification in the areas identified.	
Julietta McLoughlin	Greater London Authority	Encouraging sustainable economic growth	Policy EI 1	1098983	Not Specified	Not specified	Yes	Yes	It is noted that no Strategic Industrial Land (SIL) is proposed for release and that Policy EI 1 promotes the retention and protection of SIL, which is welcomed.		Support welcomed. No change required.	
Julietta McLoughlin	Greater London Authority	Locations for new employment floorspace	Policy EI 2	1098983	Not Specified	Not specified	Yes	Yes	The London Plan classifies Wandsworth as a restricted transfer borough with exceptional planned release relating to Nine Elms, meaning that apart from specific release from the Nine Elms area, the borough should adopt a more restrictive approach to land release. The London Industrial Land Supply and Economy Study 2015 has established that there has been significant loss of industrial land across London, significantly outstripping the benchmark set in		Comments noted. No change required. The council acknowledges the comments from the GLA and are satisfied that the LPEID sets out within policies and in the site allocations that mixed use proposals where there is capacity will incorporate industrial functions and uses.	

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									the Mayor's Land for Industry and Transport SPG. The London Plan benchmark for industrial land release in Wandsworth is 41 ha from 2011 to 2031. LPEID indicates that for the period 2016 – 2031, an additional 15 ha of industrial land is proposed for release. The release of industrial land above the London Plan benchmark is considered acceptable, provided this is balanced with an intensification of industrial floorspace. Policy EI 2 sets out a strategy to mitigate the loss of industrial land through designating these areas as Economic Use Intensification Areas, however the borough should satisfy itself that mixed use proposals incorporate industrial functions and uses.			
Julietta McLoughlin	Greater London Authority	Locations for new employment floorspace	Policy EI 2	1098983	Not Specified	Not specified	Yes	Yes	Queenstown Road, Battersea SIL  The London Plan refers to the Queenstown Road, Battersea SIL as Nine Elms (part). As part of the new London Plan we will consider amending the name of Nine Elm (part) SIL to Queenstown Road, Battersea to be in alignment with the Wandsworth Local Plan. The proposal to extend parts of the Queenstown Road, Battersea SIL as appropriate for Industrial Business Park uses is supported as long as this is in line with London Plan policy 2.17 and paragraph 2.79 and there is evidence to support the change.		Comments noted. No change required.	
Julietta McLoughlin	Greater London Authority	Protected employment land and premises	Policy EI 3	1098983	Not Specified	Not specified	Yes	Yes	Policy EI 3  The protection of New Covent Garden Market, including the railway arches adjacent to the site is welcomed.		Support welcomed. No change required.	
Julietta McLoughlin	Greater London Authority	Affordable, flexible and managed workplaces	Policy EI 4	1098983	Not Specified	Not specified	Yes	Yes	The support for affordable workspace is in line with London Plan policies and is welcomed. The requirement for 10% of all major new B class development to be affordable is considered reasonable.		Support welcomed. No changes required	
Julietta McLoughlin	Greater London Authority	Area spatial strategy for Wandle	3	1098983	Not Specified	Not specified	Yes	Yes	Area Spatial Strategy for Wandle Delta  The collaborative approach to work on the		Support welcomed. No change required.	

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		delta							Wandle Delta is welcomed.			
John Moran	Health & Safety Executive	Site allocations	4	866418	Not Specified	Not specified	Not specified	Not specified	<p>Encroachment of Local Plan Allocations on Consultations Zones</p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones namely:</p> <p>H3056 – Calor Gas, U10 Delta Business Park, SW18 1EG</p> <p>H1733, Southern Gas Networks, Wandsworth Holder Station, Fairfield Street.</p> <p>Compatibility of Development with Consultation Zones</p> <p>The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.</p> <p>Housing Allocations</p> <p>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.</p> <p>Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units <i>and</i> 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.</p>		Comments noted. No change required. The council will continue to liaise with the HSE where applicable.	

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									<p>Workplace Allocations</p> <p>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 250m<sup>2</sup> total floor space are compatible with the inner zone.</p> <p>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.</p> <p>Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail).</p> <p>Retail developments with total floor space up to 5000m<sup>2</sup> are compatible with the middle zone.</p> <p>Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone.</p> <p>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 5000m<sup>2</sup> total floor space are compatible with the outer zone.</p> <p>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 <i>Development Type</i></p> <p>Tables of HSE's Land Use Planning Methodology , which is available at:</p>			

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									<p><a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a></p> <p>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</p>			
Jabed Rahman	NHS London Healthy Urban Development Unit (HUDU)	Requirements for new employment development	Policy EI 5	224240	Not Specified	Not specified	Not specified	Not specified	<p>Under Policy EI 5 (p.39)</p> <p>Healthy and Active Design</p> <p>Poorly designed workplaces combine multiple pathways for health risks – from exposure to indoor pollutants and increased risk of asthma to lack of physical activity during work hours leading to obesity and fatigue. People spend significant parts of their lives working in building that affect their health, as a consequence new developments should consider how the development impacts on the health and wellbeing of employees. Examples include good access to natural daylight, locating and making staircases more convenient and attractive so employees can use them on a regular basis. By incorporating Active Design into employment environments, employers stand to benefit from employees' increased productivity and improved quality of life.</p> <p>Access for emergency vehicles</p> <p>Reaching a fire or medical emergency quickly is critical in the consideration of the risk to human life and property damage. Good access and design related to roads, emergency bay locations, stairwell and lifts as well as facilitating sufficient room to manoeuvre and operate equipment within the proximity of the emergency will enable prompt and efficient access to buildings by emergency services</p>	<p>Under Policy EI 5 (p.39)</p> <p>Healthy and Active Design</p> <p>Poorly designed workplaces combine multiple pathways for health risks – from exposure to indoor pollutants and increased risk of asthma to lack of physical activity during work hours leading to obesity and fatigue. People spend significant parts of their lives working in buildings that affect their health, as a consequence new developments should consider how the development impacts on the health and wellbeing of employees. Examples include good access to natural daylight, locating and making staircases more convenient and attractive so employees can use them on a regular basis. By incorporating Active Design into employment environments, employers stand to benefit from employees' increased productivity and improved quality of life.</p>	<p>Comments noted. Whilst it is considered that the criteria of Policy EI5 together with the adopted Development Management Policies DMS1 (General Development Principles - Sustainable urban design and the quality of the environment), would generally cover Active Design principles it is agreed that wording on Healthy and Active Design can be incorporated as a new paragraph following para 2.24 to clarify that Active Design should be considered as part of a requirement for new employment development. A minor amendment to Policy EI5 can also be accommodated to reflect this consideration.</p> <p>No change is considered required regarding the comment made on access for emergency services. Consideration of appropriate access for emergency services would be sought in accordance with existing Development Management Policies Document Policy DMS1 (General development</p>	<p>Add a new paragraph following paragraph 2.24 to read:</p> <p><u>Poorly designed workplaces combine multiple pathways for health risks – from exposure to indoor pollutants and increased risk of asthma to lack of physical activity during work hours leading to obesity and fatigue. People spend significant parts of their lives working in buildings that affect their health. As a consequence new development proposals should consider the impacts on the health and wellbeing of employees. Examples include good access to natural daylight and locating and making staircases more convenient and attractive so</u></p>

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									including ambulance and the fire brigade.	<p>productivity and improved quality of life.</p> <p>Access for emergency vehicles</p> <p>Reaching a fire or medical emergency quickly is critical in the consideration of the risk to human life and property damage. Good access and design related to roads, emergency bay locations, stairwell and lifts as well as facilitating sufficient room to manoeuvre and operate equipment within the proximity of the emergency will enable prompt and efficient access to buildings by emergency services including ambulance and the fire brigade.</p>	principles - Sustainable urban design and the quality of the environment). Policy DMS1 will be reviewed as part of a future full review of the Local Plan.	<p><u>employees can use them on a regular basis. By incorporating Active Design into employment environments, employers stand to benefit from employees' increased productivity and improved quality of life.</u></p> <p>Add a new 7th bullet point to Policy EI5 1:</p> <ul style="list-style-type: none"> <li>• Good telecommunic ations connectivity, including super-fast broadband connections where appropriate;;</li> <li>• <u>Active Design which encourages wellbeing and greater physical movement as part of everyday routines.</u></li> </ul>
Ipsus Developments Ltd	Boyer	Protected employment land and premises	Policy EI 3	968569	Yes	Yes	No	Yes	We consider Policy EI 3 (Protected Employment Land and Premises) to be unsound where it relates to our client's site at 30-54 Lydden Road and the rest of the Lydden Road Locally Significant Industrial Area (LSIA). The LSIA designation is no longer appropriate for the	We consider Policy EI 3 should be amended to remove Lydden Road from the LSIA designation (part of the Strategic reservoir of industrial land [1]) and that	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a	

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									<p>Bendon Valley/Lydden Road area, particularly once the former Bingo Hall and Riverside Business Centre have been removed from the LSIA boundary and redesignated for mixed use development (including residential).</p> <p>Lydden Road/Bendon Valley is a poorly performing industrial location. The LSIA contains a range of non-industrial uses including residential, offices, a pub and retail and part of the LSIA is proposed to be removed for mixed use, as described above. It is located in a predominately residential area, many buildings are in poor condition, there are a number of vacant units and it has severe parking/access issues. All of these issues seriously undermine the area's suitability for continuing industrial use. We have modelled the viability of redevelopment of our client's site at 30-54 Lydden Road for industrial purposes and found it to be unviable by a significant margin. Redevelopment is therefore unlikely to occur and the condition of the buildings will deteriorate further and eventually fall into disrepair.</p> <p>The removal of the former Bingo Hall and Riverside Business Centre from the LSIA for mixed use redevelopment without the rest of the rest of the LSIA is an inconsistent approach that has not been adequately justified. This piecemeal approach is likely to create a greater disconnect between the older industrial buildings, the newer mixed use development and the surrounding residential properties.</p> <p>We consider that a policy which includes greater flexibility, such as the proposed Employment Protection Area Policy also outlined in Policy EI 3 or the former Mixed Use Former Industrial Area (MUFIEA) policy, would be more appropriate for the whole of this area and would facilitate redevelopment and promote economic growth.</p>	<p>it should be redesignated as an Employment Protection Area or MUFIA [3] to allow for mixed use including residential. Essentially, we believe that whole Bendon Valley LSIA should be redesignated together under the same designation rather than the current part LSIA/part mixed use approach.</p> <p>As set out in the attached document, we consider the inclusion of Lydden Road as a LSIA to be unsound and not to be the most appropriate strategy when considered against reasonable alternatives (as demonstrated by our analysis of the Integrated Impact Assessment). It is not positively prepared and not compliant with paragraph 22 of the NPPF which states that 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.</p> <p>The proposed policy for Employment Protection Areas (or something similar) is more appropriate for this site as it is no longer performing as a successful industrial location. The policy for Employment</p>	<p>robust and credible evidence base. The representation has been accompanied by supporting evidence in particular with regards to the Integrated Impact Assessment preparation. In addition, viability evidence has been submitted, as has a letter by transport consultants WSP to support the objection to policy EI3.</p> <p>The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites</p>	

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										<p>Protection Areas allows more flexibility between industrial and office use based on market demand and also allows for mixed use schemes which include residential, providing that replacement employment floorspace is reprovided. This is necessary in Lydden Road as it is not viable to redevelop in this area for industrial purposes and another use such as residential is required as an enabler.</p> <p>Integrated Impact Assessment</p> <p>In summary, we consider that the Council have not adequately tested the impact of the redesignation of Lydden Road/Bendon Valley LSIA to mixed use (i.e. Employment Protection Area/MUFIEA). The only option where this is tested is under Option 4, however this includes the redesignation of all SILs and LSIA's, even those which are performing well and this consequently scores negatively. Given the poor performance of the Bendon Valley/Lydden Road in terms of the current mix of uses, access and highways issues, the condition of the buildings and its residential location, it is apparent that this would be the most</p>	<p>identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence. As detailed in the background text to policy EI6</p>	



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										<p>suitable option and would provide the greatest benefits overall.</p>	<p>LSIA's are not appropriate locations for any sort of residential use. The LSIA's serve an important function to provide land which will be the main focus for industry.</p> <p>Integrated Impact Assessment (IAA) Response:</p> <p>It is noted that the inclusion of an appraisal matrix for the IPSUS site preferred option has been submitted as part of their representation to justify a mixed use designation, removing their site from the LSIA designation. The Council considers that the IIA methodology is robust and in line with the SEA Regulations, and that the level of detail is proportionate to the scope of the Employment and Industry Local Plan. The selection of options which have been appraised in the IIA reflect an up-to-date and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of</p>	

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											<p>industrial land to meet the total forecast demand for industrial land set out in the ELPS. It is also recommended that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. In this context it was considered that an alternative option to appraise the re-designation of the remainder of the Bendon Valley LSIA (the proposed Lydden Road LSIA) was not a reasonable alternative option. This option was not identified as part of the evidence base and is not considered a reasonable option to appraise as part of the IIA. It is acknowledged that although the LSIA's do contain some office (B1a/b) employment space and non-B sector occupiers, these do not in the majority of instances conflict with the mostly industrial nature of the areas, and instead bolster the employment generating potential of these</p>	

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											<p>areas, provide more varied local job opportunities and could revert back to employment land if required or demanded.</p> <p>The SEA regulations require the identification, description and evaluation of the likely significant effects on the environment of the plan and 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' (Reg12 (1(b))). It is important to recognise that IIA is only part of the evidence base informing policy options and it is not intended for detailed site analysis. The IIA considers the policy options against the IIA objectives and not detailed environmental assessment.</p> <p>It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density</p>	

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											forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.	
Ipsus Developments Ltd	Boyer	Managing land for industry and distribution	Policy EI 6	968569	Yes	Yes	No	Yes	<p>the refurbishment/redevelopment of Lydden Road/Bendon Valley for purely industrial purposes as envisaged by Policy EI 6 is neither viable nor suitable for this area and the continuing designation of this site as a LSIA is likely to see many of the buildings, such as 30-54 Lydden Road, fall into disrepair.</p> <p>The redevelopment of the site would be viable if higher value residential could be incorporated to act as an enabler. This has already been allowed on the former Bingo Hall and Riverside Business Centre sites, however not on the remainder of the Lydden Road LSIA. We consider that this is an inconsistent approach and fails to allow the redevelopment of this area in a holistic way.</p>	<p>The refurbishment/redevelopment of Lydden Road/Bendon Valley for purely industrial purposes as envisaged by Policy EI 6 is neither viable nor suitable for this area and the continuing designation of this site as a LSIA is likely to see many of the buildings, such as 30-54 Lydden Road, fall into disrepair.</p> <p>The redevelopment of the site would be viable if higher value residential could be incorporated to act as an enabler. This has already been allowed on the former Bingo Hall and Riverside Business Centre sites, however not on the</p>	<p>Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of</p>	

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										remainder of the Lydden Road LSIA. We consider that this is an inconsistent approach and fails to allow the redevelopment of this area in a holistic way.	industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at	

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											<a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence. The Bingo Hall site is not currently in employment use and the consideration of the wider site including the Riverside Business Centre (in the same ownership) would enable an intensification of this underutilised site to provide significant investment in modern industrial premises and increasing the overall stock of industrial floorspace in the borough. The redesignation of this site has been carefully considered and will also provide opportunities to improve the public realm.	
Ipsus Developments LTD	Boyer	Site allocations	4	968569	Yes	Yes	No	Yes	We consider that our client's site and the rest of the Lydden Road LSIA should be redesigned from LSIA to Employment Protection Zone as per the policy outlined above (or a similar policy).		Comments noted. No change required. Policy EI2 sets out that IBPs are suitable for the provision of SMEs. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify the industrial offer. The LPEID was informed by an Employment Land and Premises Study (ELPS) commissioned from consultants AECOM. The findings of the	

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											<p>ELPS indicates that the borough must retain a significant quantity of industrial land in order to meet the forecast demand over the next 15 years. This is in alignment with the London Plan which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses. The ELPS recommends that the majority of the land designated as LSIA is retained in its current designation.</p> <p>In relation to the segregation of the Bingo Hall and Riverside studios area and why this has been removed from the LSIA this has arisen from the ELPS evidence which states;</p> <p>'Cluster C6 similarly comprises medium and large sized warehouses along Bendon Valley and Lydden Road, and small office units, studios, and some small light industrial space within the Riverside Business Centre.</p> <p>.....<u>Premises within all three clusters appear to be well used and have been adapted to be fit for purpose, with few vacancies. The 'Flip Out' trampoline park on Bendon Valley (formerly Mecca Bingo) could provide an opportunity for intensification and redevelopment, and includes a</u></p>	

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											<p><u>large car park.'</u></p> <p>The emerging policy allows for the southern part of the LSIA area to be mixed use but this is on the basis that there will be an intensification of use of industrial and office floorspace by at least 25%.</p>	
Gavin Scillitoe	BAF Graphics	Locally Significant Industrial Areas	Figure 3	1034248	No	Yes	No	Yes	<p>This is no longer an appropriate industrial area for the types of uses currently present on the site and we struggle to operate effectively. There are issues with traffic/deliveries as the road infrastructure is not suitable for HGVs with larger delivery vehicles often becoming stuck and creating significant safety issues. We are concerned that these issues will worsen with the intensification that is planned unless the whole area is looked at holistically and planned for appropriately.</p> <p>We have been in discussion with other land owners/developers in the LSIA and support the re-designation of the whole site for mixed use including residential. We believe that this will allow comprehensive redevelopment of the area to occur rather than the piecemeal approach currently being taken.</p>	Remove Lydden Road as a LSIA and redesignate for mixed use which includes residential and greater flexibility on the type of employment floorspace allowed.	<p>Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and</p>	



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											<p>that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification</p>	

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											in accordance with this evidence.  The proposed Bendon Valley EUIA has underutilised premises which are large enough to allow for a mix of uses including residential without compromising industrial uses on site or in the proposed Lydden Road LSIA.	
Duncan Sambrook	Sambrook's Brewery Ltd	Local Plan - Employment and Industry Document - proposed submission version - March 2017		930406	Not Specified	Not specified	Not specified	Not specified	<p>I am not qualified to comment on whether the plan is legally compliant, sound or compliant with the duty to cooperate, however as a business owner and operator in the borough I do have a view on the impact that policy decisions are impacting our business and the wider industrial sector in the borough.</p> <p>By way of background we created a brewery in Yelverton Road, a missed use industrial, residential area in 2008 and over this period have seen our rent grow 35% and rates (with the new review) about 50%. We now employ 22 people full time and generate tax receipts for the government of in excess of £1 million on the activities that we undertake annually.</p> <p>We originally chose the site as a central location with good transport links and the capability to expand. Unfortunately, during this time we have seen the opposite happen with all of the commercial/light industrial units in the area slowly being turned to residential. We are now the only industrial site in the area of note and are coming under increasing pressure to move.</p> <p>We conducted a review of potential sites 18 months ago with an agent, specifying our need and desire to stay in the area and the scope to continue our expansion, the startling response was that there was nothing available. This seems to be consistent with your analysis of</p>	<p>In summary, I consider that the lack of availability of appropriate industrial sites in the borough is making it prohibitively expensive for small to medium sized businesses like ourselves to operate within the borough. The plan does not adequately address this concern nor does it make adequate plans to address the lack of availability and their affordability.</p>	<p>Comment noted. No change required. It is considered that the plan is sound and is based on a robust and credible evidence base, which takes into account demand and supply of industrial uses. The purpose of the document is to inform the future approach to the provision, protection, release and enhancement of employment land and premises.</p>	

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									<p>industrial availability in the borough and my concern is that the supply plans that you have detailed in the plan is not nearly sufficient to cope with your anticipated demand. The impact of this is that industrial businesses wishing to continue trading within the borough will continue to see large rises in rent and rates as availability is scarce. The businesses are therefore taking the financial burden of a failure in local planning policy when it comes to industrial sites.</p> <p>The observation that we have lost a large amount of industrial sites over the last 10 years and that there is no desire to replace these is also concerning and leaves little options for us as a business to expand in the borough. I would also add that the large number of microbusinesses may in part be because there are insufficient opportunities for businesses to expand. We have the potential over the next 5 years to increase our business by 50100% given the availability of space but as a business owner the uncertainty and the cost of doing so in the borough will likely curtail our ambitions and ultimately I can see us leaving the borough entirely. If there were opportunities for small to medium sized businesses to expand I feel certain that this would help consolidate existing industrial space as you refer to in the plan. Without these opportunities consolidation and maximisation of existing industrial space will continue to be a challenge. The other major factor which I do not feel has been adequately considered in the plan is adequate transport links and access to and from industrial areas. Certainly, as a business that relies heavily on our ability to transport our own goods to and from our site we have been severely restricted by increased traffic and residential development encroaching on industrial areas. Managing any conflict between land use is becoming increasingly more difficult for industrial land users and added to the</p>			

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									increased cost of operating such a business in the borough brings into question the longer term viability of small to medium sized industrial and distribution enterprises in the borough.			
David Penniston	Safestore Ltd	Encouraging sustainable economic growth	Policy EI 1	994413	Not specified	Not specified	Not specified	Not specified	We acknowledge the Council's position with regards to appropriate land uses within a SIL and whilst we recognise that the existing uses on site are broadly in line with the uses supported under an IBP designation, this would not encourage transformative change or help to deliver a more successful place in LBW, rather it would maintain the status quo.	Therefore, if the Council are not minded to allow flexibility within a SIL designation, we suggest that the Ingate Place site should be re-designated as an Economic Use Intensification Area (EUIA).	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in	

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											<p>accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>	
David Penniston	Safestore Ltd	Locations for new employment floorspace	Policy EI 2	994413	Not Specified	Not specified	Not specified	Not specified	<p>Ingate Place is currently home to a self-storage warehouse (a small industrial use) and an SME business centre. The site is not intensively used, particularly given its public transport accessibility, proximity to Queenstown Road station and we consider that the existing warehouse building falls short of its potential to</p>	<p>Amendments: In light of this, we suggest amendments (underlined) to the wording of Policy EI 2 paragraph 4 as follows:</p>	<p>Comments noted. No change required.</p> <p>The lawful use of the Safestore site at Ingate place is B8 and serves as an important function as an industrial use.</p>	

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									<p>create place.</p> <p>We acknowledge the Council's position with regards to appropriate land uses within a SIL and whilst we recognise that the existing uses on site are broadly in line with the uses supported under an IBP designation, this would not encourage transformative change or help to deliver a more successful place in LBW, rather it would maintain the status quo.</p> <p>Therefore, if the Council are not minded to allow flexibility within a SIL designation, we suggest that the Ingate Place site should be re-designated as an Economic Use Intensification Area (EUIA).</p> <p>Proposed Policy EI 2, identifies EUIAs as</p> <p>"areas with capacity to provide intensified industrial uses, increased business floorspace and/or managed workspace for SME businesses. Residential use will also be appropriate in these areas, where this assists in developing more intensive economic uses and is compatible with the spatial objectives set out in the relevant Area Spatial Strategy and/or Site Allocation".</p> <p>When developing employment areas for the future, there is an increasing focus on creating a place which functions beyond work, and creating an environment where people chose to work. Therefore in addition to intensifying economic use of land, policy should seek to promote place-making to benefit and strengthen the resilience of employment land.</p> <p>... with policy wording amended as stated above, would provide sufficient flexibility for Safestore to realise their vision for the site to provide an enhanced contribution to the employment offer in LBW supported by complementary uses to create a sustainable place for the future.</p>	<p>To help meet the need for business and industrial floorspace, and to support emerging and growing industries, the following areas are designated as Economic Use Intensification Areas:</p> <p>Former Gala Bingo Hall/Riverside Business Park, Bendon Valley</p> <ul style="list-style-type: none"> <li>• Gas Holder, Hunts Trucks, Delta Business Park, Armoury Way</li> <li>• Panorama Antennas, Frogmore</li> <li>• Causeway Island, Keltbray Site and Wentworth House, Dormay Street</li> <li>• Ferrier Street</li> <li>• Frogmore Depot</li> <li>• Chelsea Cars and KwikFit garage, Armoury Way</li> <li>• <u>Safestore Site, Ingate Place</u></li> </ul> <p>These areas have capacity to provide intensified industrial uses, increased business and commercial floorspace and/or managed workspace for SME businesses. Residential use will also be appropriate in these areas, where this assists in developing more intensive economic uses and is compatible with the spatial</p>	<p>Policy EI2 sets out that the IBP areas can provide economic uses, and allows for office use as well as workspace for SMEs. The SIL plays a crucial role in providing industrial land for Wandsworth and is recognised in the London Plan as being of strategic importance for London and which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses. The loss of industrial land from the SIL would put significant pressure on the remaining industrial sites in the borough. It would not be appropriate to further dilute the land of the SIL in the IBP and It is not accepted to re-designate the site as a Economic Use Intensification Area (EUIA).</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the</p>	

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										<p>objectives set out in the relevant Area Spatial Strategy and/or Site Allocation if applicable. The site allocation for each area sets out the required approach to the provision of economic and other uses on the site and must be complied with.</p> <p>As a result, we suggest that an EUIA designation, with policy wording amended as stated above, would provide sufficient flexibility for Safestore to realise their vision for the site to provide an enhanced contribution to the employment offer in LBW supported by complementary uses to create a sustainable place for the future.</p>	<p>transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less</p>	

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											<p>dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p> <p>The respondents proposed wording of adding 'commercial floorspace' to be acceptable in the specified listed areas is not considered appropriate. The Economic Use Intensification Areas would provide an increase in industry and other business uses as well as allowing residential uses into the area. Other commercial uses considered in a mixed use scheme would be assessed in accordance with the adopted Local Plan and are not the focus of the intensification in accordance with Policy EI2.</p>	
David Penniston	Safestore Ltd	Locations for new employment floorspace	Policy EI 2	994413	Not Specified	Not specified	Not specified	Not specified	Safestore are the owners of three employment sites within the London Borough of Wandsworth (LBW): Ingate Place in Battersea, 19 Lombard Road in Battersea and 1 Bendon Valley on Garrett Lane. This letter of representation will discuss the proposed 2017 EID at a strategic level, and also in relation to the specific employment premises and self-storage facilities at Ingate Place (the site).	In summary, the emerging LBW 2017 EID and the adopted London Plan seek that IBPs provide better quality surroundings consistent with higher value general industrial uses, which use land more creatively to enable mixed	Comments noted. No change required.  Policy EI2 sets out that IBPs are suitable for the provision of SMEs. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify	



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									<p>The Safestore Ingate Place site offers an exciting opportunity to bring forward an employment led mixed use development to deliver an enhanced place for Battersea that would connect with the wider area and Battersea Nine Elms as a whole therefore, if the Council are not minded to allow flexibility within a SIL designation, we suggest that the Ingate Place site should be re-designated as an Economic Use Intensification Area (EUIA).</p> <p>Proposed Policy EI 2, identifies EUIAs as;</p> <p>'areas with capacity to provide intensified industrial uses, increased business floorspace and/or managed workspace for SME businesses. Residential use will also be appropriate in these areas, where this assists in developing more intensive economic uses and is compatible with the spatial objectives set out in the relevant Area Spatial Strategy and/or Site Allocation.'</p> <p>When developing employment areas for the future, there is an increasing focus on creating a place which functions beyond work, and creating an environment where people chose to work. Therefore in addition to intensifying economic use of land, policy should seek to promote place-making to benefit and strengthen the resilience of employment land.</p>	<p>use activity.</p> <p>Page 4 - We acknowledge the strategic role of SIL, and the aspirations of IBPs to provide industrial floorspace. However, consistent with Safestore's representations to the Policy Options Consultation Document (Oct 2016), we suggest that there should be greater flexibility for a developer/landowner to bring forward re-development proposals for schemes which maintain or enhance the employment offer of a site with the ability to provide complementary uses that are both compatible with neighbouring uses and help deliver exciting new places to live, work and play.</p> <p>We recommend four changes to policy. These relate to;</p> <p>(1) the boundary of the SIL and IBP designation in the Queenstown Road, Battersea SIL (Figure 2 on page 28),</p> <p>(2) the text in EI2 paragraph 4 which covers the EUIA designation, and</p> <p>(3) the text in EI6 paragraph 6.</p> <p>We suggest the boundary of the SIL and the IBP in Figure</p>	<p>the industrial offer. This is in alignment with the London Plan which states that IBPs are not intended for large scale office development nor residential use, and where offices are proposed this should not jeopardise local provision for light industrial accommodation for these uses.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of</p>	

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										2 on page 28 is adjusted to exclude the Safestore Site, Ingate Place.	<p>an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p> <p>By adding in flexibility to allow</p>	

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											the area to accommodate residential within an EUIA is not in accordance with evidence of the policy protection and therefore would prejudice the strategic role of the SIL, and would risk eroding the industrial floorspace in these areas. Ingate place currently is in B8 use within the SIL area which already allows for some flexibility in allowing for business floorspace. It is not a suitable location for residential or commercial uses as proposed in the response wording.	
David Penniston	Safestore Ltd	Affordable, flexible and managed workplaces	Policy EI 4	994413	Not Specified	Not specified	Not specified	Not specified	<p>As drafted, proposed Policy EI 4 expects all new developments resulting in an uplift of economic floorspace to contribute to the provision of affordable, flexible and/or managed workspace. However, as currently drafted the proposed policy does not give a clear indication as to the provision of affordable workspace sought through the plan and it does not take into account development viability. Therefore the draft policy is not in accordance with the NPPF in that ... "</p> <p>Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing,</p>		Comments noted. No changes required. Planning obligations are considered by the council in economic viability statements as part of a planning application and this is set out within the Planning Obligations SPD. Any future requirements will be updated through forthcoming versions of the Planning Obligations SPD. The background text has weight when applying the policy and it is not felt necessary to repeat within the policy as more or less floorspace could be provided subject to viability evidence and site specific requirements.	

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									<p>standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable" (Para. 173 NPPF).</p> <p>We recognise that Paragraph 2.14 of the 2017 EID discusses the provision of a minimum of 10% of gross economic floorspace as Managed Workspace, and that Paragraph 2.15 highlights that ... " If the development would not provide sufficient affordability and business support features, a proportion of floorspace will be secured at an affordable rent in perpetuity, subject to scheme viability". However, we suggest that the requirements of the policy in terms of affordable workspace and its dependence on scheme viability should be explicitly set out within the text of Policy EI4.</p>			
David Penniston	Safestore Ltd	Affordable, flexible and managed workplaces	Policy EI 4	994413	Not Specified	Not specified	Not specified	Not specified	<p>We also recommend a change to draft policy EI4 which pertains to the provision of affordable, flexible and managed workplaces. If Ingate Place were intensified to bring forward additional employment floorspace then draft policy EI4 would trigger the requirement for affordable, flexible and managed workplaces in a manner consistent with the policy. Whilst Ingate Place's employment floorspace is oriented towards SMEs and offers several different forms of workspaces the requirement to provide workplaces defined by policy could impact the viability of the intensification of economic uses onsite.</p> <p>Paragraph 2.15 in the sub-text for draft policy EI4 refers to viability. It says that in the case when a development would not provide sufficient affordability and business support features in the provision of affordable, flexible and managed workplaces, a proportion of</p>	<p>We therefore suggest making the provision of affordable, flexible and managed workplaces subject to viability so as not to jeopardise the intensification of economic uses at Ingate Place.</p> <p>We suggest the text in EI4 paragraph 2 should be changed in the following manner:</p> <p>2. Development proposals for affordable, flexible and managed workspace will be encouraged in order to meet the specific needs of SMEs in the local economy including those in emerging</p>	<p>Comments noted. No changes required. Planning obligations are considered by the council in economic viability statements as part of a planning application and this is set out within the Planning Obligations SPD. Any future requirements will be updated through forthcoming versions of the Planning Obligations SPD. The background text has weight when applying the policy and it is not felt necessary to repeat within the policy as more or less floorspace could be provided subject to viability evidence and site specific requirements.</p>	

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									<p>floorspace will be secured at an affordable rent in perpetuity, subject to scheme viability. This viability proviso should be included in the text of the draft policy instead of the sub-text. Also the viability proviso should be applied to all instances where affordable, flexible and managed workplaces are provided.</p>	<p>and specialist sectors where the borough demonstrates – or could develop – local specialisation. All development that provides economic floorspace will be expected to contribute to the provision of affordable, flexible and/or managed workspace subject to viability.</p>		
David Penniston	Safestore Ltd	Managing land for industry and distribution	Policy EI 6	994413	Not Specified	Not specified	Not specified	Not specified	<p>We acknowledge the strategic role of SIL, and the aspirations of IBPs to provide industrial floorspace. However, consistent with Safestore's representations to the Policy Options Consultation Document (Oct 2016), we suggest that there should be greater flexibility for a developer/landowner to bring forward re-development proposals for schemes which maintain or enhance the employment offer of a site with the ability to provide complementary uses that are both compatible with neighbouring uses and help deliver exciting new places to live, work and play.</p>	<p>We acknowledge the strategic role of SIL, and the aspirations of IBPs to provide industrial floorspace. However, consistent with Safestore's representations to the Policy Options Consultation Document (Oct 2016), we suggest that there should be greater flexibility for a developer/landowner to bring forward re-development proposals for schemes which maintain or enhance the employment offer of a site with the ability to provide complementary uses that are both compatible with neighbouring uses and help deliver exciting new places to live, work and play.</p>	<p>Comments noted. No change required. Policy EI6 sets out that IBPs are suitable for the provision of SMEs as well as retaining a significant industrial function. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify the industrial offer.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as</p>	

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											<p>there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of and Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-</a></p>	

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											<p><a href="#">base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>	
David Penniston	Safestore Ltd	Managing land for industry and distribution	Policy EI 6	994413	Not Specified	Not specified	Not specified	Not specified		<p>We suggest the text in EI6 paragraph 6 should delete mention of Ingate Place because we recommend that Ingate Place be taken out of the SIL and proposed IBP area.</p>	<p>Comments noted. No change required. Policy EI6 sets out that IBPs are suitable for the provision of SMEs as well as retaining a significant industrial function. The intention of the policy is to ensure that sites which may be redeveloped for office use retain a significant industrial function and intensify the industrial offer.</p> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of</p>	

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											<p>industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of and Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers</p>	



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											that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.	
David Penniston	Safestore Ltd	Site allocations	4	994413	Not Specified	Not specified	Not specified	Not specified	<p>Enabling a mix of employment and non-employment uses on the same site can provide place-making benefits such as increased vitality through integrating culture, community and workspace to create a thriving place. It can also provide economic benefits through opportunities for cross collaboration between businesses, cross subsidy to enhance viability of development proposals to facilitate delivery, and the potential for employment land intensification.</p> <p>There is also potential to create a ladder of workspaces at Ingate Place, for businesses to progress from smaller to large employment space on the site itself as they expand, and also to potentially move into other employment spaces within the wider area, such as those emerging in the wider Vauxhall Nine Elms Battersea Opportunity Area.</p> <p>Establishing a more flexible approach to the planning policy framework would benefit the wider LBW economy as well as this specific site.</p>	'We suggest the boundary of the SIL and the IBP in figure 2 on page 28 is adjusted to exclude the Safestore Site, Ingate place.'	Comments noted. No change required. In line with the London Plan designation for IBP's the Queenstown Road, Battersea SIL should retain a significant industrial function. However, it is flexible in it's approach that it allows for B1b and B1a uses which can provide accommodation fro SMEs.	
Clinton Bell	Unknown	Protected employment land and premises	Policy EI 3	1095012	No	Yes	Yes	Yes	<p>Jaggard Way is an important location for local businesses that serve the local community and in my opinion should be retained for light industrial use and to protect jobs.</p> <p>Many of the business have been there a long time and employ many people, and are actively used by the community.</p> <p>Commercial space designation under the</p>	I ask the Council to issue an "Article 4 Direction" to remove the permitted development rights that are likely to be pursued by the current owners.	Comments noted. No change required. The policy is considered to be sound and based on a robust and credible evidence base. These comments relate to a planning application and this is to be considered separately to the local plan. However, the comments are noted in relation	Amend wording at first sentence of EI5.1 to read:  'New developments for economic uses must provide a good standard of accommodation and be suitable flexible

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									current proposed residential development would not be a suitable replacement for the business there now, and the proposed ground-floor commercial units in the proposed new development are unlikely to fit in to the proposed blocks of flats and will probably themselves end up being converted into residences.		to the policy and it is considered that a clarification is required. The intention of policy EI3 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy EI5 which seeks any redevelopment to retain existing businesses on site following development, with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.  Separate to the Local Plan review the whole of the Jaggard Way area is included in the Council's proposed Article 4 Direction (Change of use from B1a (offices) to C3 (dwellinghouses). The Article 4 Direction will come into effect on the 16th May 2018. Once in force, the effect of the Direction means that a change of use for offices to residential use in this location will require planning permission, thereby giving protection from a change of use in accordance with the Local Plan, and allowing the	<u>workspace which would allow for a range of unit sizes for use by a wide range of occupiers.'</u>

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											Council to properly assess whether there is demand for these premises. Industrial uses were not included as they are not subject to the same permitted development rights and would already need a planning application to change to a residential development. The effect of Policy EI3 compared to the existing adopted Local Plan 2016 would be that redevelopment proposals for Jaggard Way would be assessed against Policy EI3 which protects the existing industrial use whereas previously there was no policy basis for protection in the adopted Local Plan 2016. Proposed Policy EI3 therefore gives a basis for protection of industrial floorspace upon application.	
Charles Wates	Needspace?	Protected employment land and premises	Policy EI 3	1099030	No	Yes	No	Yes	<p>We are the owners of the Earlsfield Business Centre (9 Lydden Road) which is located with the Bendon Valley/Lydden Road LSIA. Earlsfield Business Centre provides offices, studios and workshops on flexible contracts to SMEs and startups.</p> <p>We do not support the retention of the rest of this area as a LSIA once the former Bingo Hall Site and Riverside Business Centre have been removed. This area already contains a mix of uses that are not industrial and therefore feel that a mixed use policy which allows a wider range of employment types and residential would be more appropriate.</p> <p>We have been in contact with other land owners/developers in the area and support the change of policy to provide a more flexibility and allow for mixed use</p>	Remove Lydden Road as a LSIA and redesignate for mixed use which includes residential and greater flexibility on the type of employment floorspace to be reprovided.	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a	

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											<p>cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density</p>	

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											forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to redesignation and intensification in accordance with this evidence.	
Caroline Steenberg	London Borough of Richmond	Local Plan - Employment and Industry Document - proposed submission version - March 2017		1099004	Not Specified	Not specified	Not specified	Not specified	We note the redesignation of some, generally larger sites. With regard to employment policy matters, Richmond welcomes and agrees with protection of industrial land and employment premises, the economic use of railway arches and the support for affordable, flexible and managed workspace. LBRuT accepts the approach to preventing loss of business and industrial floorspace as set out in Local Plan. We approve of the inclusion of requirements for employment floorspace where identified in the site allocations contained in the plan and the identification of environmental and biodiversity improvements particularly along the Thames and Wandle Rivers. We can confirm that that the changes do not raise any new strategic and/or crossboundary issues from those we previously discussed.		Comments noted. No change required.	

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Unknown	Style and Space Contractors Limited	Protected employment land and premises	Policy E13	1099427	Not Specified	Not specified	Not specified	Not specified	<p>The subject site sits at the edge of Thornsett LSIA and is located along a street (Penwith Road) that is more residential in character. The majority of Penwith Road is residential, therefore extension or intensification of industrial uses in this area is likely to impact residents of Penwith Road.</p> <p>The site access off Penwith Road is not an appropriate road to tackle large vehicles at a high frequency normally associated with industrial or storage uses. The continued use of cars or larger vehicles along Penwith Road would have a damaging effect on the existing surrounding uses. Penwith Road is a through road for residents and commuters, the rest of the Thornsett industrial estate is physically separated from residents with a road (Groton Road) that is primarily used by the industrial premises of the LSIA (and is recognised and therefore not resulting in conflict with surrounding other uses, such as residents.</p> <p>Furthermore, policy seeks to increase and enhance B1 c, B2 and B8 uses within LSIA's and given the site's location on a predominantly residential street the ability to do this is restricted due to the potential negative impact it would have on surrounding residents.</p>	Therefore, it is considered that the removal of this site from the LSIA would allow consideration of more appropriate uses responding to the context on Penwith Road. It is suggested that a mixed use development with commercial at the ground floor and residential above would be more appropriate	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the	

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											existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a> . The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to redesignation and intensification in accordance with this evidence.	
David Penniston	Safestore Ltd	Protected employment land and premises	Policy EI 3	994413	Not Specified	Not specified	Not specified	Not specified	The proposed policy ambition of LBW for the site is to create a 'better offer' in terms of industrial uses and employment. Proposed Policy EI 3 states that the ' <i>Queenstown Road SIL will provide land for transport functions including rail freight.</i> ' The current uses on the site do not relate to transport functions or rail	LBW's currently proposed policy ambition in the 2017 EID would enable an increase in the provision of uses currently on site. However, under the currently proposed policy	Comments noted. No change required. It is considered that the approach set out in the LPEID on protecting and redesignation of employment land is sound and based on a robust and credible evidence	

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									<p>freight, and due to the high value and vitality of the uses on site, and Safestore's future operational requirements, the site is unlikely to be occupied by these uses at any point in the future. Therefore, we suggest that limiting the site to industrial uses with other ancillary employment uses is an approach that does not incentivise investment and would result in a missed opportunity for the Borough.</p>	<p>wording, the overall ambitions of both LBW and Safestore are unlikely to be fully realised, as the mix of uses which would be supported in IBPs are limited.</p> <p>Safestore recognise the importance of the site to the boroughs industrial and employment</p> <p>Greater flexibility in the policy wording would assist in optimising the site by facilitating a range offer and are fully cognisant with the approach that any re-development opportunity would have to be employment led. However, to better optimise the sites potential to create a thriving place at the heart of Queenstown, Battersea and to achieve its full economic potential, the appropriate integration of industrial activities with other land uses needs to be realised.</p> <p>As such, the designation of Ingate Place as an IBP without sufficient flexibility in the wording to bring forward a mixed use development comprising partly of non-industrial uses would stifle the overall ambition and not accord with policies seeking to optimise potential of employment uses</p>	<p>base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include higher density employment uses (e.g B1a/b) through designation of and Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower</p>	



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										supported by complementary uses including but not limited to retail, cafes, education, leisure, hotel or residential, thus creating a better offer for the borough.	<p>the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/wh-at-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/wh-at-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p> <p>As previously commented it is not considered appropriate to extend the IBP around the western edge of the SIL as this could result in the erosion of industrial and transport use of the sites which place a significant role in meeting the borough's need for sites suitable for heavier industry and transport functions. The Queenstown Road SIL is an important area for providing transport functions, with a large bus depot, rail interchange within the site, as set out in the site allocation DPD. Whilst Safestore Ltd does</p>	

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											<p>not operate as a transport function it is within industrial use and is inline with the London Plans definition of suitable uses within the IBP areas. These uses are; research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution.</p> <p>The SIL is also identified in the London Plan as being of strategic importance to London as a whole. Allowing residential uses in any part of the SIL would result in the piecemeal loss of industrial sites and compromise flexibility of remaining sites to provide land for a broad range of appropriate uses.</p>	