

15 January 2018

Delivered by email and post

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Dear Charlotte

WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY DOCUMENT

EVIDENCE RELATING TO NEW MATTERS

We write further to the 1 December 2017 letter from Inspector Kenneth Stone, who has been appointed by the Secretary of State to hold the examination into the Wandsworth Local Plan: Employment and Industry Document (LPEID).

In this letter it is set out that it is not necessary for interested parties to submit further material based on the original representations. The letter does however state that the Inspector will accept evidence on any new matter which may have arisen since the original representations were submitted. The example of a new document being produced is given.

We have already made representations on behalf of Rockspring PIM (who is acting on behalf of Cheshire West and Chester Council) to the Policy Options and Proposed Submissions versions of the LPEID. As advised by the Inspector, we will not use this as an opportunity to repeat those representations, although we uphold those comments. However we are using this opportunity to bring to the attention of the Inspector new evidence and documents that have a significant bearing on the LPEID.

Strategic Housing Land Availability Assessment

A key component of plan-making is the use of an adequate, up-to-date and relevant evidence base. This is deemed as being necessary by the National Planning Policy Framework (NPPF) in paragraph 158.

Since the previous consultations, a key new evidence-based document has been produced which Wandsworth must take into account – the Mayor's Strategic Housing Land Availability Assessment (SHLAA) (November 2017). Wandsworth's annual housing capacity is given as 2,310 by the SHLAA. This is an increase from the current annual target of 1,812. This 2,310 housing capacity figure will be

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Wandsworth's new housing target, as has been expressed by the Mayor and as is set out in the New Draft London Plan (December 2017).

The relevance of a new housing target to what is an employment-based Local Plan review is that land use integration is extremely important, especially in a dense urban world-leading city such as London. Indeed the NPPF at paragraph 158 explains that the assessment of and strategies for housing, employment and other uses are to be integrated. Therefore it is crucial that the LPEID does its bit to accommodate the additional housing that Wandsworth needs and must deliver.

LPEID Policy EI3 makes a fleeting reference to the acceptability of mixed-use developments at Employment Protection Areas (which includes Jaggard Way, the land our client has an interest in). This does not go far enough and will not facilitate the delivery of the quite significant extra amount of homes needed in Wandsworth.

Our recommendation is that the LPEID actively seeks to optimise employment land by allocating particular sites for mixed-use intensification – notably land at Jaggard Way. Land at Jaggard Way is capable of accommodating at least 86 new homes. This can be achieved by re-wording the policy to include the text:

“There is an expectation that Employment Protection Areas are redeveloped to co-locate employment uses with new homes. Residential development that does not demonstrably optimise the housing density of the site will be refused.”

Draft New London Plan

The Draft New London Plan was published for consultation in December 2017. It is acknowledged that it is an emerging document and is not yet adopted. That said, it clearly represents the direction of travel that the Mayor is taking and the LPEID ought to give consideration to it.

There is a particular focus on increasing housing supply (as evidenced by the increased housing targets for many boroughs including Wandsworth), co-locating housing/employment, and optimising site density, particularly at highly accessible locations at railway stations such as Jaggard Way. Indeed the Draft New London Plan policies will require development to optimise densities otherwise face **refusal** of planning permission. Text contained in the plan also refers to the need to develop at densities above a site's surroundings. (See Policies GG2, D6 and H1.)

This is a sensible approach if the housing London needs is to be built. If LPEID Policy EI3 is reworded to include our abovementioned suggested text, it will help with realising the aspirations of the London Plan.

With regards to the protection of employment land, it is notable that the Draft New London Plan deliberately omits the requirement for like-for-like employment floorspace re-provision for the redevelopment of Non-Designated Industrial Sites (the category Wandsworth's Employment Protection Areas will fall into). Draft New London Plan Policy E7 requires no net loss of employment floorspace for only Strategic Industrial Location (SIL) and Locally Significant Industrial Sites (LSIL).

Therefore in recognition that Jaggard Way is not significant for London or Wandsworth, the LPEID Policy EI3 requirement for no net loss of employment floorspace as part of redevelopment proposals ought to be discarded to reflect Draft New London Plan Policy E7. Instead, LPEID Policy EI3 ought to seek the *“intensification of employment floorspace, to the satisfaction of the local planning authority.”*

This will give greater flexibility to developers. An obvious example is where an existing employment site is capable of retaining or increasing the amount of jobs but with lesser and higher quality floorspace; and where this will facilitate the optimisation of the site in terms of providing much needed homes.

Conclusions

The Inspector has invited further representations where there is new evidence since any original representations were submitted.

The NPPF requires Local Plans to be based on up-to-date evidence. A new SHLAA has been published by the Mayor which will increase Wandsworth's housing requirement quite significantly.

The LPEID must play its part in delivering these additional homes. We strongly recommend that its policies relating to Employment Protection Areas have the **expectation** that these sites will be redeveloped and optimised to deliver housing; and that applications that fail to do so are to be refused. Relatedly, its policies must be flexible with the employment floorspace re-provision in order to allow optimal land uses.

The above will ensure that the LPEID reflects the new evidence-based documents and the Draft New Local Plan.

We trust that these comments will be taken into account as part of the examination. In the meantime, if you have any queries or require further information, please contact me or my colleague Craig Slack.

Yours sincerely

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