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Dear Mr Hutchings,

**Wandsworth Local Plan: Employment and Industry Document (LPEID) Review
Update to Representations submitted in April 2017 to the Wandsworth Local Plan: Employment and Industry Document (Proposed Submission Version March 2017)**

Introduction

We write on behalf of our client, Safestore Plc (Safestore). We submitted written representations on 28 April 2017 to the London Borough of Wandsworth's (Wandsworth) consultation on the Wandsworth Local Plan: Employment and Industry Document (Proposed Submission Version March 2017) (LPEID).

In summary, our representations sought 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. Specifically, we suggested that the Ingate Place site should be re-designated as an Economic Use Intensification Area (EUIA), and therefore suggested amendments to the wording of policy EI 2.

In addition to the written representations we have also confirmed to the Programme Officer that we wish to participate in and speak at the oral Examination in Public scheduled to commence on 20th February.

Update to Representations

Since we submitted our written representations in April 2017, The London Plan - The Spatial Development Strategy for Greater London Draft for Public Consultation December 2017 (Draft New London Plan) has been published (published for consultation on 29th November 2017 until 2nd March 2018).

We write to request that Wandsworth and the Inspector consider how the emerging Wandsworth policy aligns with the Draft New London Plan when assessing the soundness of the emerging Wandsworth LPEID.

In relation to our client's specific site at Ingate Place, under the LPEID, Wandsworth are proactively proposing to change the designation of the Ingate Place site to Industrial Business Park (IBP), from the Preferred Industrial Land (PIL) designation within the adopted Local Plan. Both PIL and IBP lie within Strategic Industrial Land (SIL). The site lies within SIL – Queenstown Road Battersea.



The site is not currently intensively used, and we consider it offers an exciting opportunity to bring forward an employment led mixed use development to optimise the potential of the site and deliver an enhanced place for Battersea.

Ambitions of Wandsworth

It is clear that the Wandsworth Local Plan recognises that land and space across London needs to be used more intelligently and creatively to promote mixed use activity. The Wandsworth Corporate Business Plan sets out one of its key strategic objectives as making Wandsworth an attractive, safe, sustainable and healthy place.

The LPEID proposes to re-designate the Ingate Place site from PIL to IBP, as set out in Policy EI6. Under the proposed designation as IBP, a range of uses would be supported under the LPEID including light industrial (B1c), general industry (B2), Storage & Distribution (B8) and other appropriate sui generis uses that relate to the industrial nature of the area in IBPs. B1a (office) and B1b (research and development) may also be appropriate. This reflects the adopted London Plan (2016) policy on IBPs.

Through the LPEID, Wandsworth set out that IBPs can provide higher quality surroundings consistent with higher value general industrial uses, to enable land to be used more creatively to enable mixed use activity.

Disconnection between Wandsworth's emerging LPEID and the Draft New London Plan

Through the LPEID, Wandsworth have stated their ambition to use industrial land more efficiently to promote mixed use activity.

However, policy E5 (Strategic Industrial Land (SIL)) of the Draft New London Plan proposes to remove the distinction between PILs and IBPs and does not list B1a office use as a broad industrial-type activity which should be supported. This is a step change from the current London Plan and the emerging Wandsworth LPEID.

Therefore, any additional flexibility offered through a re-designation of the Ingate Place site to IBP through the LPEID, which based on the anticipated adoption timescales is scheduled to be adopted in Winter 2018, is anticipated to fall away less than a year later as the Draft New London Plan is anticipated to be adopted in Autumn 2019.

We note in Examination Document *ID/05*, the Inspector has asked Wandsworth:

“Does the publication of the consultation in relation to the new emerging London Plan have any implications for their Employment and Industry Document and the on-going examination process?”

We have reviewed the Examination Document *LBW_PR_002_Council_Response_to_ID_005*.

We note Wandsworth's comment that the Draft New London Plan is currently only at consultation stage, and is intended to be adopted in Autumn 2019, whereas the LPEID is intended to be adopted in Winter 2018.

We recognise Wandsworth's ambition to adopt the LPEID up to a year before the London Plan, however, as the principles of the London Plan in relation to industrial land have fundamentally changed as set out in Policy E4, shifting from a no net loss of 'land' to a no net loss of industrial 'floorspace' capacity approach, and removing IBP as a SIL designation, we suggest that the LPEID needs to be considered in relation to the Draft New London Plan.

This shift in the Draft New London Plan to a no net loss of ‘floorspace’ rather than no net loss of ‘land’ policy provides opportunities to intensify, co-locate or substitution of industrial floorspace, and provides additional scope for the mixed use redevelopment of industrial sites. In the borough-level categorisations of industrial floorspace capacity, Wandsworth is identified in the ‘provide capacity’ category. In these boroughs, the Draft New London Plan anticipates that intensified floorspace capacity should be delivered, and also encourages innovation to make more effective use of land in SILs.

Draft New London Plan Policy E7 (Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function) considers how intensification, co-location and substitution of industrial land could support the delivery of greater employment numbers with complementary uses including residential and other compatible uses where appropriate.

Whilst we consider the site to have excellent potential for a mixed use development, in order for Wandsworth to realise its ambition to bring forward efficient redevelopment of industrial land, allowing a greater quantum of uses compatible with industrial floorspace, including offices, Wandsworth will need to consider whether this ambition is compatible with SIL as defined by the Draft New London Plan.

To encourage investment in existing industrial land in Wandsworth, and to provide an uplift in employment opportunities, and to work in accordance with the new approach set out in the draft London Plan we suggest that the land proposed as IBP in the LPEID (see Figure 1 below), could come forward as a Masterplan to intensify and consolidate industrial uses, enabling flexible conditions for redevelopment and for delivery of place making objectives. A masterplan approach would be in accordance with the would give Wandsworth flexibility to collaboratively shape the site specific proposals with a handful of developers/landowners.

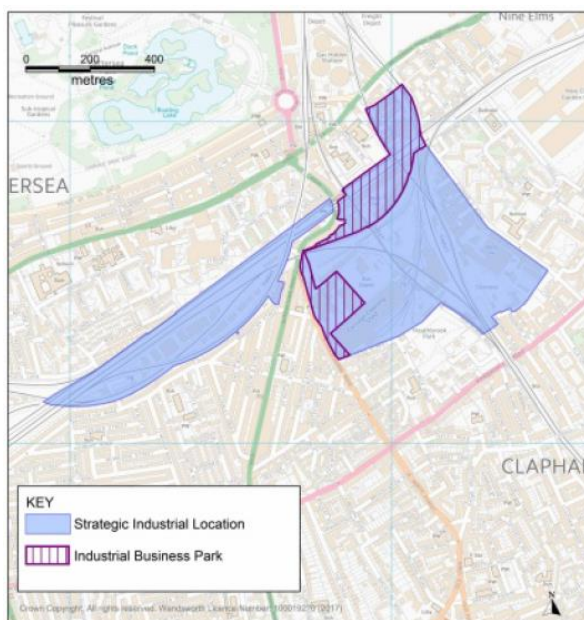


Figure 1 - page 28 of the LPEID (March 2017)

In line with Part D of Policy E5 in the Draft New London Plan, we suggest that a masterplan approach is applied to the wider area which is proposed to be re-designated as IBP in the LPEID to ensure the potential of these sites are optimised.

Part D of Policy E5 in the Draft New London Plan states that:

“Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough”

In light of the above, we suggest amendments (highlighted in red) to the wording of Policy EI 6 (Managing land for industry and distribution) in the emerging LPEID:

“1. In the SIL and LSIA, the following uses will be supported:

- *Light industry (B1c)*
- *General industry (B2)*
- *Storage and distribution (B8)*
- *Appropriate sui generis uses that relate to the industrial nature of the area*

2. Redevelopment of sites within the SIL and LSIA must provide full replacement of existing B1(c), B2 or B8 floorspace. Intensified use of sites for industrial purposes, through increased floorspace, operating hours or other methods, will be encouraged.

3. Development proposals for other uses will not be supported, except as set out in parts 4, 5, ~~and 6~~ and 7 below.

4. Outside of the part of the Queenstown Road, Battersea SIL that is designated for Industrial Business Park uses, office (B1a) and research and development (B1b) uses within the SIL and LSIA will only be supported where they are ancillary to the use of a site for one or more of the industrial uses identified in section 1 above.

5. Within the part of the Queenstown Road, Battersea SIL that is designated for Industrial Business Park uses, uses other than those identified in part 1 of this policy could be brought forward through a co-ordinated masterplanning process in collaboration with LB Wandsworth and the GLA.

~~*5. 6. In some instances, non-industrial uses may be appropriate in the SIL and LSIA if these are small-scale and cater to the local needs of people working in the area.*~~

~~*6. 7. The Silverthorne Road, Ingate Place and Havelock Terrace parts of the Queenstown Road, Battersea SIL are appropriate for Industrial Business Park uses. These areas should retain a significant industrial function, with all development in these areas providing floorspace for the industrial uses identified in section 1 above. Alongside industrial uses, these parts of the SIL will also be appropriate for research and development (B1b) uses as well as smaller-scale offices (B1a) that provide accommodation for SMEs*~~

The Ingate Place site is located in a highly accessible location, and a masterplan approach in collaborative with Wandsworth and the GLA would facilitate the optimisation of the site to make the best use of land.

We look forward to discussing the points set out in our April 2017 representations, and in this letter, with you at the Examination in Public commencing on 20th February.

If you have any queries or would like to discuss anything further, please do contact Julian Carter (jucarter@savills.com 020 7075 2816, Iain Buzza (iain.buzza@savills.com / 0207 075 2811) or Alice Kennedy (akennedy@savills.com / 0203 320 8285).

Yours sincerely

A handwritten signature in cursive script that reads "Savills".

Iain Buzza
Associate Director
Savills

cc.

Kenneth Stone BSc (Hons) DipTP MRTPI, Planning Inspector
Charlotte Glancy, Programme Officer