Wandsworth Local Plan Employment and Industry Document

Suggested Main Modifications



Table 1 sets out the Suggested Main Modifications.

The role of the Planning Inspector is to only consider the soundness of the Plan and the Main Modifications to make the Plan sound.

Changes are presented in the conventional form of strikethrough for deletions and underlining for additions of text.

The Schedule is listed in policy and page number order and therefore changes to the supportive text may appear before policy changes.

The paragraphs and figures of the whole Local Plan: Employment and Industry Document will be re-numbered as a result of proposed modifications.

Table 1: Suggested Main Modifications

Ref.	Title	Policy/Par	Page No.	Change proposed	Reason
		a Number			
	Locations for new employment floorspace	Policy EI2.2	25	Amend second sentence of paragraph EI2.2 to read: 'To ensure there is no detrimental impact on town centres, applications for development that would result in a net increase in employment (use class B1a) floorspace will need to be justified by a sequential test.'	Policy EI2, point 2 is proposed to be altered due to a typo, the policy should require applications which would result in a net increase in employment use class B1a (offices) to demonstrate that there is no detrimental impact on the town centres.
MM/01	Locations for new employment floorspace	Policy EI2.4	25	Amend wording to first sentence of EI2.4 to read: 'To help meet the need for business and industrial floorspace, and to support emerging and growing industries, the following areas as set out on the Policies Map, are designated as Economic Use Intensification Areas:'	In order to cross refer to the identification of EUIAs within the policy map wording is proposed to be added to policy EI2.4
	Locations for new employment floorspace	Policy EI2.4	25	Delete bullet points of EI2.4 to read; • Former Gala Bingo Hall/Riverside Business Park, Bendon Valley • Gas Holder, Hunts Trucks, Delta Business	New formatting is proposed to show which Site Allocation falls within which Economic Use Intensification Area. This is required to clearly set

Ferrier StreetFrogmore Depo	nnas, Frogmore H, Keltbray Site and Ise, Dormay Street	out the EUIAs in the policy EI2 and the site allocation that falls within them.
Economic Use	Associated Site	
Bendon Valley	● Riverside Business Centre and former Bingo Hall (Policies Map ref 99F)	
Central Wandsworth	 Panorama Antennas (Policies Map ref 42B) Causeway Island including land to the east (Policies Map ref 40) Keltbray Site, Wentworth House and adjacent land at Dormay Street (Policies Map ref 42) 	

				Chelsea Cars and KwikFit	 Ferrier Street (Policies Map ref 42C) Frogmore Depot (Policies Map ref 42A) Hunts Trucks, adjoining sites including the Gasholder (Policies Map ref 41) Chelsea Cars and KwikFit (Policies Map ref 35A) 	
MM/01	Locations for new employment floorspace	Policy EI2.4	26	and other uses on the si with. Where a site alloca	ach area sets out the e provision of economic te and must be complied	For clarification purposes, add proposed wording to end of para 4 to state that where the increase of 25% floorspace is sought it will be the net internal area.

	Protected employment land and premises	Policy EI3.1	32	Amend wording of first sentence in EI3.1 to read: 'A strategic reservoir of industrial land will be retained in the borough, made up of the Queenstown Road, Battersea Strategic Industrial Location (SIL) and the following Locally Significant Industrial Areas (LSIAs) in the Wandle Valley as identified on the Policies Map:'	In order to cross refer to the identification of SIL and LSIAs within the policy map wording is proposed to be added to policy EI3.1.
MM/02	Protected employment land and premises	Policy E13.2 (Protectin g office floorspac e)	32	Amend wording of EI3.2 (Protecting office floorspace heading) to read; 'Redevelopment proposals in the locations set out in point 3 above will only be permitted if:'	To clarify that the criteria for redevelopment proposals refers to the locations that have been identified to protect office floorspace. The amendment refers to point 3 which is the new paragraph number as set out in the Additional Mods table.
	Protected employment land and premises	Policy EI3.3	33	Amend wording of the 4 th Paragraph on p33 (preceding the bullet points) to read: 'The following areas will be protected <u>as identified on the Policies Map.'</u>	In order to cross refer to the identification of EPAs within the policy map wording has is proposed to be added to policy EI3.3.
MM/03	Affordable, flexible and managed workplaces	Policy EI4.2	38	Add wording to paragraph EI4.2 to read: 'All development that provides economic floorspace will be expected to contribute to the provision of affordable, flexible and/or managed workspace, which will be secured via S106 agreement.'	To ensure clarity on how affordable, managed workspace will be secured wording is proposed to be added to the policy to highlight that the mechanism used will be via \$106.

MM/03	Affordable, flexible and managed workplaces	Policy El4.2bii	38	Add wording to paragraph EI4.2bii to read: 'Providing a proportion of office floorspace at an affordable rent in perpetuity-, subject to scheme viability.'	As agreed at the hearing sessions wording will be added to refer to scheme viability within Policy EI4.
MM/04	Requirements for new employment development		39	Add a new paragraph immediately following paragraph 2.24 within Section 2.5 (Requirements for new employment development) to read: '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 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.'	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 to clarify that Active Design should be considered as part of a requirement for new employment development.
	Requirements for new employment development		39	Add new paragraph immediately following the proposed new paragraph above in Section 2.5 (Requirements for new employment development) to read:	In order to clarify Policy EI5 reflects the aspirations of the Council in relation to seeking realistic rents and retention of existing business. The

				'Given the significant increase in rent levels for businesses in the borough in recent years, and the affordability implications for many businesses, especially the SME firms that make up the majority of the borough's business base, it is considered appropriate to seek realistic rents for existing businesses and to take into consideration existing space requirements and any other reasonable business needs following redevelopment in accordance with the Planning Obligations SPD.'	Council will shortly be producing a revised Planning Obligations SPD which will contain the approach as to how the Council wishes an applicant to retain existing businesses.
MM/04	Requirements for new employment development	Policy EI5.1	39	Add a new 7th bullet point to Policy EI5. 1 to read: • 'Good Telecommunications connectivity, including superfast broadband connections where appropriate-; and • Active Design which encourages wellbeing and greater physical movement as part of everyday routines.'	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. However, a minor amendment to Policy EI5 can also be accommodated to reflect this consideration.
	Requirements for new employment development	Policy EI5.1	39	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 workspace which would allow for a range of unit sizes for use by a wide range	It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' by referring to allowing for a range and type of unit sizes for use by a wide range of business occupiers. This change should give further clarity on

				of occupiers.'	achieving the optimal requirements for new employment development.
MM/04	Requirements for new employment development	Policy EI5.2	39	Amend Policy EI5.2 bullet point 2 and amend Policy EI5.2 between bullet points 3 and 4 to read: • 'Floor to ceiling heights of 3.35m or similar where justified; • Space on site for servicing/parking of commercial vehicles; and • Goods lifts for multi-storey developments (with a minimum loading of 500kg).'	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. The word 'and' is proposed to be added to clarify both parts of the criteria must be complied with to meet the Policy test.
	Requirements for new employment development	Policy EI5.4	40	Amend EI5.4 to read: 'Redevelopment of existing economic uses should where viable wherever possible seek to retain existing businesses on site following development, with similar taking into consideration existing space requirements, lease terms and rent levels, and any other reasonable business requirements, if those businesses wish	As agreed at the hearing sessions clarification on when EI5.4 should be applied has been added.

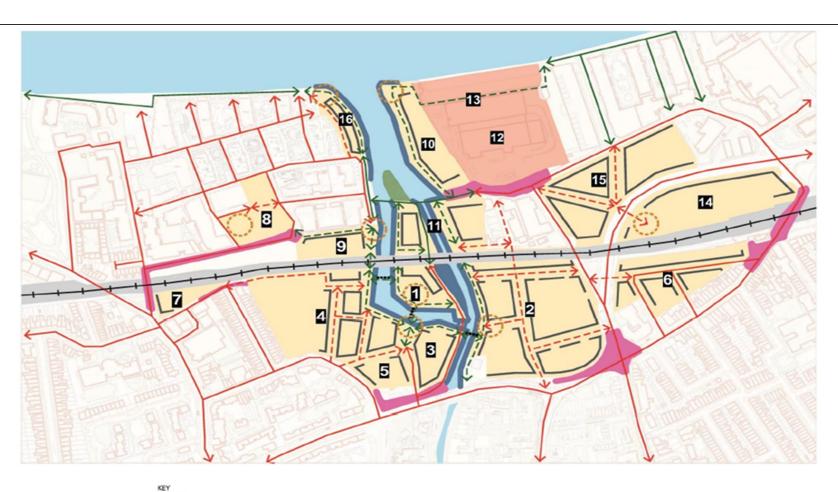
				to remain. If retention is not possible this should be demonstrated through a viability appraisal. Further details will be set out in the Planning Obligations SPD.'	
MM/05	Managing land for industry and distribution	Paragraph 2.29	41	Delete paragraph 2.29: The northern and western edges of the Queenstown Road, Battersea SIL will be promoted for designation in the forthcoming London Plan as Industrial Business Park. The Summerstown LSIA will be promoted for designation in the forthcoming London Plan as part of the North Wimbledon SIL. The North Wimbledon SIL is currently made up of the industrial estates at Durnsford Road and Plough Lane in the London Borough of Merton. And replace with the following wording:	Paragraph 2.29 is proposed to be deleted and replaced in recognition that the emerging London Plan no longer recognises IBP as a category of designation and that additional wording is required to Policy EI6 and the supportive text (para 2.29) to allow for the IBP to be considered as a LPEID standalone policy not relying on the London Plan if the IBP designation is to be deleted as proposed in the Draft London Plan.
				The northern and western edges of the Queenstown Road, Battersea SIL are designated as an Industrial Business Park (IBP). All development in these areas is required to provide floorspace for industrial uses. Those proposals which additionally include research and development (B1b) or SME office accommodation (B1a) may also be appropriate provided these uses do not erode the industrial function and character of the SIL. Consideration will be given to the impact of new development upon the existing operational use of the SIL to sustain its long term viability as an industrial area.	In addition to the above it is proposed to delete reference to Summerstown LSIA potentially becoming part of the North Wimbledon SIL as part of the emerging London Plan. As agreed at the hearing sessions Summerstown industrial area to remain as LSIA in accordance with the latest evidence of the Employment land and premises study. A new replacement paragraph 2.29 is proposed which provides details of

				The IBP designation will facilitate at this accessible location the development of intensified employment uses, complementing the anticipated digital cluster focussed in the emerging Battersea Power Station town centre, whilst maintaining compatible business uses within the SIL.'	the IBP designation and defines types of development that are suitable.
MM/05	Managing land for industry and distribution	Policy EI6.6	42	Amend wording in last sentence of Policy EI6.6 to read: '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 SME office accommodation (B1a) provided that the use does not erode the effective operation of the industrial function of the SIL. Consideration will be given to the impact of new development upon the existing operational use of the SIL including; access arrangements, layout and design, ability to operate 24 hours and compatibility with uses within the wider area of the SIL to sustain its long term viability as an industrial area.	To provide clarification. El6.6 makes provision for SME office accommodation in appropriate circumstances as set out in the El6.6 and suggested modification. In addition wording has been added to the policy to recognise that office (B1a) and research and development (B1b) may only be appropriate where it does not jeopardise the industrial function of the SIL.

MM/06	Redundancy of employment premises	Policy EI7.1	43	Amend wording between bullet point 1 and 2 of EI7.1 to read: The premises must be unsuccessfully marketed for a continuous period of at least 18 months while vacant or available for occupation; and Convincing Justifiable evidence must be provided to demonstrate that it is not feasible or viable to refurbish, renew or modernise the premises in order to meet the requirements of existing or future occupiers.'	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to justifiable in accordance with the Inspector's Main Issues and Questions. The word 'and' has been added to clarify both parts of the criteria must be complied with to meet the Policy test.
	Redundancy of employment premises	Policy EI7.3	43	Amend wording of first sentence in Policy EI7.3 to read: 'For larger offices that provide over 1,000 sq ms of office floorspace, convincing justifiable evidence must be provided to demonstrate that it is not feasible or viable to adapt the office floorspace as smaller business (B1) units to meet demand from SME business.'	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to justifiable in accordance with the Inspector's Main Issues and Questions.
	Redundancy of employment premises	Policy EI7.4	43	Amend wording of first sentence in Policy EI7.4 to read: 'In Employment Protection Areas, employment premises should be marketed in accordance with EI7.1 for a broad range of employment uses including all B class and appropriate <i>sui generis</i> uses.'	To ensure the policy is clear, cross reference to EI7.1 has been added to the policy as agreed at the hearing sessions.

	Waste	Policy El8.6	47	Add wording to Policy El8.6, (iv) to read: '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 or adversely affect the setting of Heritage Assets'	An amendment is proposed to take further into account heritage assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan Policies. DMPD policy DMS2 and DMS2b currently refers to the 'setting of the heritage asset itself and the surrounding historic environment'
MM/07	Waste	Policy EI8.7	47	Add wording at Policy El8.7, (vii) to read: 'sites which contain no archaeological features and do not adversely affect heritage assets or their settings;'	An amendment is proposed to take further into account heritage assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan Policies. DMPD policy DMS2 and DMS2b currently refers to the 'setting of the heritage asset itself and the surrounding historic environment'
	Waste	Policy EI8.9	47	Add wording at Policy El8.9,(vi) to read: 'the impact of development on Heritage Assets or their settings;'	An amendment is proposed to take further into account heritage assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan Policies. DMPD policy DMS2 and DMS2b currently refers to the 'setting of the heritage asset itself and the surrounding historic environment'

MM/08	Area Spatial Spatial Strategy For Wandle Delta	49	Amend Figure 7 Area Spatial Strategy for Wandle Delta to include a key identifying the site allocations and to change format to landscape	It is proposed that a key would be added to Figure 7 to provide the numbering on the sites to aid identification of the sites to provide clarity. To accommodate this change the format will be changed to landscape view. Figure 7 will also be renumbered as a result of the proposed modifications.





MM/08	Area Spatial	Area	50	Add new section after paragraph 3.5 before the	For clarification and consistency it is
	Strategy for	Spatial		Strategic Opportunities section to read:	proposed to add wording to the Area
	Wandle delta	Strategy			Spatial Strategy to include listing the
		Wandle delta		' <u>The Sites</u>	sites that are allocated.
		deita		There are 16 sites that are all inter-linked in	
				terms of the contribution that future	
				development proposals can make to the	
				achievement of the objectives for the area.	
				These sites are:	
				1. Causeway Island including land to the	
				<u>east</u>	
				2. Hunts Trucks, adjoining sites including	
				Gasholder, Armoury Way	
				Keltbray Site, Wentworth Housing & adjacent land at Dormay Street	
				4. Frogmore Depot	
				5. Panorama Antennas	
				6. Ferrier Street	
				7. 92 Putney Bridge Road (HSS Hire)	
				8. <u>9, 11 and 19 Osiers Road</u>	
				9. <u>Linton Fuels Site, Osiers Road</u>	
				10. Feather's Wharf, The Causeway	
				11. Land at the Causeway	
				12. Cory Environmental Materials Recycling	
				Facility, Smugglers Way	
				13. Western Riverside Transfer Station	
				14. <u>Homebase, Swandon Way</u>15. <u>B and Q, Smugglers Way</u>	
				16. Wandsworth Riverside Quarter, Point	
				Pleasant.	

			This Area Spatial Strategy for Wandle Delta provides guidance for these 16 sites and the diagram shows how any new development should be designed in order to meet the Local Plan objectives. The strategy shows how new development should be designed in order to contribute to the provision of vibrant new public spaces and achieve safe and attractive connections within the town centre and start the connections to the Thames Riverside.'	
MM/09	Site Allocations with the Policies Map reference numbers: 40 42 42A 42B 42C 42D 99F	57 63 65 68 70 72 and 104	Amend Tall Buildings paragraph in each Site Allocation to delete first sentence and add additional text to read: 'In accordance with Core Strategy Policy IS3d. Tall buildings in this location are likely to be inappropriate. In accordance with DMPD DMS4, the height at which a development in this location will be considered to be tall is 5 storeys. Policy DMS4 sets out the areas where tall buildings may be appropriate or are likely to be inappropriate. Development proposals will trigger assessment against the detailed criteria in Policy DMS4b in order to demonstrate compliance with the Core Strategy.'	The proposed change relates to the Site Allocations with the Policy Map reference numbers in the second column. To provide clarity and avoiding misinterpretation of DMPD Policy DMS4

MM/09	Site Allocations with the Policies Map reference numbers: 50 51 52 53 54 55 56 57 58 Riverside Business Centre and Former Bingo Hall, Bendon Valley.	Design Principles	84 86 88 90 91 92 94 96 98 99	Amend Tall Building's paragraph in each Site Allocation to delete first sentence and add additional text to read: 'In accordance with Core Strategy Policy IS3d. Tall buildings in this location are likely to be inappropriate. In accordance with DMPD DMS4, the height at which a development in this location will be considered to be tall is 9 storeys. Policy DMS4 sets out the areas where tall buildings may be appropriate or are likely to be inappropriate. Development proposals will trigger assessment against the detailed criteria in Policy DMS4b in order to demonstrate compliance with the Core Strategy.' Amend wording in third paragraph 'Design Principles' to read: 'If feasible, this should link up with a pedestrian route continuing to the south; otherwise provision should be made for a footbridge across the Wandle at the south western corner of the site. to provide opportunities to improve access across the Wandle.'	The proposed change relates to the Site Allocations with the Policy Map reference numbers in the second column. To provide clarity and avoiding misinterpretation of DMPD Policy DMS4 To clarify that the overall aim which is to improve access to the River Wandle, and to improve flexibility in approach in that a footbridge is not necessarily a requirement in this location.
	Site 42D (92 Putney Bridge Road - HSS Hire)	Site Allocation	71	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.	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
				'Site Allocation: The site is located within an	residential uses subject to the

Employment Protection Area. Redevelopment of requirements of policies EI3 and EI5. The site falls within a cluster of sites the site should re-provide the existing employment generating industrial floorspace or, that are within an employment if there is no demand for this use, should provide protection area; 57 Putney Bridge Road, 8892 Putney Bridge Road and with the same quantity of employment floorspace (as set out in policy EI3). 23 Adelaide Road. To ensure the Redevelopment could include residential uses as intention of the site allocation is clear well as employment use, subject to the the wording is proposed to be requirements of policies EI3 and EI5.' 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.