

Wandsworth Local Plan



IN CONSTANT USE

Employment and Industry Review

Policy Options
Document
October 2016

Policy options consultation document

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1 Introduction

1.1 Wandsworth Council is producing a new Local Plan document covering employment premises and industrial land. The new document will form part of the Local Plan for Wandsworth, setting out relevant planning policies and allocating sites. It will replace the following employment and industrial land policies in the existing Local Plan documents:

- Core Strategy:
 - PL6 – Meeting the needs of the local economy
 - PL7 – Land for industry and waste
 - PL8 – Town and local centres (in relation to employment uses only)

- Development Management Policies Document:
 - DMTS14 – Offices
 - DMI1 – Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs)
 - DMI2 – Mixed Use Former Industrial Employment Areas (MUFIEAs)
 - DMI3 – Thames Policy Area
 - DMI4 – Provision of flexible employment floorspace
 - DMI5 – Allocated Sites for waste management facilities
 - DMI6 – Development of waste management facilities on unallocated sites
 - DMI7 – Development criteria for waste sites

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

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

1.3 Thirty one responses were received. These are set out in the Regulation 18 Consultation Report which also includes an analysis of the responses and how the issues raised have been taken forward in the preparation of the Employment & Industry Local Plan document.

1 This consultation was carried out in accordance with Regulation 18 of [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

1.4 The work is currently in the second part of Stage 1. This part involves setting out different policy options and consulting on these options to help identify the best way forward. The issues and options are set out in section 7 below. Responses will be considered and assessed against the strategic priorities of the Council; this is not an opportunity to identify the most popular approach but rather to find the best way to plan for meeting the needs of the local and London economy.

1.5 This consultation is being carried out in accordance with the council's adopted Statement of Community Involvement. All responses are gratefully received and will be considered and, where relevant, used to inform the proposed submission version of the Employment and Industry Local Plan document. A further consultation will be carried out on the proposed submission version as set out in the timetable below.

2 Timetable

Stage	Exercise	Timeframe
Stage 1: Preparation	Regulation 18 preparation stage consultation	Dec 2015 – Jan 2016
	Employment Land and Premises Study	Apr – Jul 2016
	Call for sites	Jun – Sep 2016
	Policy Options consultation	Oct 2016
Stage 2: Publication	Publish submission version	Mar 2017
	Regulation 19 submission version consultation	Mar – Apr 2017
Stage 3: Examination	Submission to Secretary of State	Oct 2017
	Examination	Dec 2017 – Apr 2018
Stage 4: Adoption	Adoption	Jul 2018/Dec 2018 ⁽²⁾

2 Adoption may be delayed to Dec 2018 if there is a need to carry out a consultation on additional modifications following the examination hearings.

3 National Planning Policy Framework & Planning Practice Guidance

3.1 The National Planning Policy Framework, published March 2012, sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development, which means that local planning authorities should positively seek opportunities to meet the development needs of their area and should usually meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. The NPPF sets out 12 core planning principles, including the requirement for planning to be genuinely plan-led, to have up-to-date local plans and for plans to be based on joint working and co-operation. Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

3.2 Paragraphs 21 and 22 of the NPPF state that:

In drawing up Local Plans, local planning authorities should:

- *set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- *support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- *plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
- *facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

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. Land allocations should be regularly reviewed.

3.3 The NPPF also addresses how local plans should ensure the vitality of town centres, by pursuing policies to support the viability and vitality of town centres and to allocate a range of suitable sites to meet the development needed in town centres; this is relevant to the review as offices are recognised in the NPPF as one of the main town centre uses.

3.4 The NPPF requires local planning authorities to produce a Local Plan for its area (para 153) and allows for this to be reviewed to respond flexibly to changing circumstances. Local Plans should be aspirational but realistic (para 154) and should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.

3.5 Strategic priorities for the area should be set out in the Local Plan (para 156) and this should include strategic policies to deliver the jobs needed in the area. The Local Plan should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (para 158).

3.6 Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area (para 160). The NPPF sets out the evidence requirements relating to business needs; see section 5 below for a summary of the evidence base that has informed this review.

3.7 The NPPF states that public bodies have a duty to cooperate on planning issues that cross administrative boundaries. Wandsworth Council have carried out meetings and correspondence with the various public bodies required by the duty to cooperate and these have informed the direction taken in this review. A report of this work will be prepared in preparation for the next formal (Regulation 19) stage of consultation.

3.8 The Planning Practice Guidance (PPG) sets out detailed guidance for [the production and deliverability of local plans](#). The PPG also details the approach for [how Local Planning Authorities should assess their economic development needs and identifying appropriate land to meet these needs](#). This guidance has been followed throughout this review and has directly informed the preparation of the Employment Land and Premises Study by AECOM and the policy options set out in this document.

3.9 The National Planning Policy Framework identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate. As this is a partial review, the intention is primarily to assess development potential for employment uses. However, it is recognised that some sites may also have potential to provide housing and this will be taken into consideration in the forthcoming full review of the Local Plan as well as being fed into the London Plan review.

4 London Plan

4.1 The London Plan sets out the Mayor’s vision and objectives in relation to the economy of the capital, and seeks to ensure that London is a city that meets the challenges of economic and population growth and is an internationally competitive and successful city with a strong and diverse economy. Policy 4.1 of the London Plan aims to:

promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors.

4.2 The new Mayor of London has announced plans to amend the London Plan, putting in place stronger protection for small businesses and start-up workspace and delivering new spaces for small businesses, the creative industries, artists and the fashion industry ⁽³⁾.

3 <https://www.london.gov.uk/press-releases/mayoral/protection-for-small-businesses>

5 Evidence

5.1 The policy options set out below and the wider review have been informed by various evidence sources, in particular a new Employment Land and Premises Study (ELPS) commissioned from AECOM. The report from this study is available on the Council's website www.wandsworth.gov.uk/employmentlandreview. The primary findings of the study are:

- A forecast demand for additional office floorspace between 2016 and 2030 to serve the local/sub-regional office market⁽⁴⁾ of between 31,700 and 65,800 sq ms;
- A forecast demand for an additional 8.2 Ha or a contraction in demand of -9.5 Ha for industrial land in the borough between 2016 and 2030.

5.2 The ranges set out in the forecasts give different growth scenarios, based either on the economic forecast for the borough itself or for the wider functional economic market area (FEMA) which includes surrounding boroughs.

5.3 The report made a number of policy recommendations, which have informed the policy options set out below in section 8 – Proposed Policy Options.

5.4 The review is also informed by various studies produced or commissioned by the Greater London Authority (GLA):

- [London Industrial Land Supply & Economy Study 2015](#) (AECOM, prepared for GLA – March 2016)
- [London Office Policy Review 2014](#), including the updates to the office employment forecasts in 2014
- [Small offices and mixed use in London's Central Activities Zone \(CAZ\) 2015](#) (Ramidus Consulting Ltd, prepared for GLA – August 2015)
- [Supporting Places of Work: Incubators, Accelerators and Co-working Spaces](#) (URS, prepared on behalf of GLA, 2015)
- [The creative industries in London \(GLA Economics working paper, 2015\)](#)
- [Workspace Providers Directory \(GLA, January 2015\)](#)
- [London Business Survey 2014 \(GLA Economics\)](#)
- [Artists' Workspace Study \(GLA 2014\)](#)
- [London Industrial Land Baseline \(URS 2010\)](#)
- [London Wholesale Markets Review 2007 \(GLA 2007\)](#)

4 This does not include the forthcoming supply of large scale offices that are due to be developed in Nine Elms, which the study identifies as likely to command high rental levels and aimed at the central London office market rather than local and sub-regional businesses.

5.5 Other studies and reports produced by third parties that have been used to inform the approaches explored in this policy options review include:

- [London 2036 – an agenda for jobs and growth \(London Enterprise Panel, London First 2015\)](#)
- [Workspace Futures – the changing dynamics of office locations \(NLP, 2015\)](#)
- [London’s industrial land: Cause for concern? \(J Fern & E Jones, Bartlett School of Planning, February 2015\)](#)
- [Size matters: the importance of small firms in London’s economy \(Centre for Cities, 2012\)](#)

6 Wandsworth spatial vision and strategic objectives

6.1 The employment and industry review is only a partial review of the adopted Local Plan. The new employment and industry local plan document will replace the relevant policies and site allocations in the adopted plan, but it will need to fit with the adopted spatial vision and strategic objectives for the borough that are set out in the Core Strategy (2016). The vision includes:

- A range of opportunities for local business activity, including start up and small enterprises, in mixed use developments;
- A strategic pool of key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea, continuing to provide opportunities for industry and warehousing which are better located outside residential areas, as well as new waste management facilities.

6.2 The Strategic Objectives set out the following:

- Seek to maximise the employment potential of land in the borough by safeguarding land and buildings for business and industrial use and promoting development for employment purposes in appropriate locations including as part of mixed use development so as to increase job and business opportunities.
- 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.
- Increase the viability and vitality of the town centres and local centres, including the proposed centres at Battersea Power Station and Vauxhall, as the focus for shopping and for employment and leisure and other community activities.

7 Emerging Local Plan

7.1 Wandsworth Council is also undertaking a full review of the Local Plan. This will take longer than the partial review. Currently the intention is to 'slot in' the policies and site allocations from the employment and industry review into the new Local Plan, however this relies on these policies remaining relevant and fitting with the new spatial vision and strategic objectives that will come out of the full review.

8 Proposed Policy Options

8.1 The council have identified a set of policy issues that the Employment & Industry Plan will need to address. For each, a number of policy options have been identified. These are set out as questions, asking respondents what approach should be taken. These options have come from a range of sources, including:

- The existing policy approach as set out in the Wandsworth Local Plan 2016;
- The findings of the Employment Land and Premises Study (AECOM, 2016);
- Representations made in response to the Regulation 18 consultation in December 2015/January 2016;
- Meetings with external partner organisations and other London boroughs through the Duty to Co-operate;
- Policy approaches set out in the London Plan and national guidance;
- Internal strategic discussions with relevant council departments.

8.2 The broad policies and the options to address these are set out in the section below; in the current consultation we are seeking views on whether the policy approaches and options are the best way to plan for meeting the economic needs of the borough and the wider market area. At the end of this section there is an opportunity to submit any additional or alternative approaches.

8.1 EI1 – Strategic Approach – encouraging sustainable economic growth

8.3 The NPPF requires Local Planning Authorities to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth. The relevant parts of the Council's spatial vision and strategic objectives, as set out in Wandsworth's adopted Core Strategy 2016, are described in section 6 above.

8.4 As this review is only a partial review of the Council's Local Plan, this vision and these objectives are not under review. However, it is important that the Council identify and plan for the most appropriate growth forecast scenario and that the policies and site allocations in the Local Plan reflect the most up-to-date evidence, within the framework set by the adopted spatial vision and strategic objectives. The emerging Local Plan document must also be in general conformity with the London Plan.

8.1.1 Growth Scenarios

8.5 AECOM’s Employment Land and Premises Study (2016) forecasts the demand for office floorspace and industrial land in the borough between 2016 and 2030. This is then compared against the supply of employment land and premises, giving a remaining figure which is the additional amount that needs to be supplied or the amount than can be released for other uses.

8.6 The study has provided three growth scenarios, based on the employment forecast produced by GLA Economics. GLA Economics forecast that in Wandsworth itself, office-based employment will grow from 13,000 jobs to 14,900 jobs and employment based in industrial premises will contract from 13,300 jobs to 11,400 jobs. Across the wider region including Wandsworth and nearby boroughs, GLA Economics predicts that employment for office and industrial jobs will both expand. AECOM take these two different sets of forecasts for employment and then apply this to the amount of office floorspace and industrial land that is needed to meet these different scenarios, with a central option being the mid-point between the two. This gives the following demand projections:

Supply and Demand for Industrial Land in Wandsworth (hectares)

Existing supply of industrial land	78.9		
	Low growth	Central growth	High growth
Forecast demand for industrial land 2016-2030	69.4	77.8	87.1
Requirement (demand minus supply)	-9.5	-1.1	8.2

Supply and Demand for Office Premises in Wandsworth (sq ms)

Existing Supply of offices	390,100		
	Low growth	Central growth	High growth
Forecast demand for office floorspace 2016-2030	432,300	449,000	466,400
Requirement (demand minus supply)	31,700	48,400	65,800

8.7 The forecast demand for office floorspace in the table above relates to the need to provide premises for the local and sub-regional office market; AECOM have calculated the requirement for the large-scale national and international office market separately. This is discussed in more detail in section EI4 below.

8.8 The low growth scenarios for office floorspace and industrial land set out in the ELPS are based on projections for the growth of employment in the borough of Wandsworth itself; the high growth scenario is based on employment projections for the wider Functional Economic Market Area, which includes surrounding boroughs, and which is projected, as a whole, to grow at a higher rate than Wandsworth.

8.9 These forecasts do not take into account the 'pipeline' of development, ie the sites with planning permission or existing allocations in the adopted Local Plan that would result in an increase or loss of office floorspace or industrial land. This includes significant areas of formerly industrial land in Nine Elms which now form part of the Vauxhall Nine Elms Battersea Opportunity Area, as well as sites within areas that are designated in the adopted Local Plan as Mixed Use Former Industrial Areas (MUFIEAs).

8.1.2 Conformity with the London Plan

8.10 The London Plan [Land for Industry and Transport SPG](#) sets out benchmark figures for the release of industrial land across London and for each individual borough. This projected that, of the 179 hectares of industrial land in the borough in 2010, 41 hectares could be released for alternative uses over the 20 year period between 2010 and 2031. The ELPS has identified that since 2010 the actual amount of industrial land released has been approximately 36.9 ha, which equates to 90% of the GLA SPG benchmark release figure having been released in just the first 6 years of the 20 year period.

8.11 The GLA intend to commission an Industrial Land Demand Study in autumn 2016 to sit alongside the London Industrial Land Supply and Economy study (2015). This may entail a revisiting of the benchmark rates of release particularly in light of the actual release or loss of industrial since 2012 being greater than that forecasted, and will inform the forthcoming London Plan review.

8.1.3 Decision to leave the European Union

8.12 The referendum held in July 2016 resulted in a majority in favour of the UK leaving the EU. Some initial impacts in the immediate aftermath of the decision included:

- Fall in the value of the pound;
- Falls in the value of shares, particularly for banks and UK construction firms;
- Cessation of trading by commercial property investment trusts.

8.13 The longer-term impacts of this result on the wider economy, the terms of departure from the EU and the effects of this on the long term need for employment land in London and Wandsworth have yet to emerge.

8.14 It should also be noted that the Local Plan is required to look at the long-term timescale covering the next 15 years, during which the economy may go through a variety of economic cycles reflecting other influences as well as the UK leaving the European Union.

8.15 Taking all of the above into account:

Question 1

Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

Question 2

What impact would the decision to leave the EU have on the preferred growth scenario?

Question 3

Do the findings of the ELPS and other recent evidence in any way undermine the strategic objectives set out in section 6 above?

8.2 EI2 – Protecting and Re-designating Industrial Land

8.2.1 Broad Approach to Protecting Industrial Land as SIL or LSIA

8.16 In the adopted Local Plan there are 42.8 hectares of land that are designated as a Strategic Industrial Location in the Queenstown Road, Battersea area and a further 37.9 hectares of land designated as Locally Significant Industrial Areas along the Wandle valley. These areas contain the majority of industrial uses in the borough and individually are the largest industrial areas, making up 56 per cent. Sites in industrial, waste and distribution use elsewhere in the borough are:

- Large distribution sites in Nine Elms
- New Covent Garden Market
- Areas near the Thames and in Wandsworth town centre which are designated in the Local Plan 2016 as Mixed Use Former Industrial Employment Areas
- Wharves along the Thames and adjoining land, used for waste transfer or aggregates
- Smaller industrial areas elsewhere in the borough, such as the Jaggard Way industrial estate
- Individual storage or industrial sites across the borough, including sites under and around railway arches

Area	Land (Ha)
Queenstown Road (SIL)	42.8
Wandle Valley (LSIAs)	37.9
Nine Elms (including NCGM)	11
Rest of the borough	50.2
Total industrial land	141.9

8.17 The Strategic Vision for the borough, as set out in the adopted Core Strategy 2016, includes a strategic pool of key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea.

8.18 The findings of the ELPS indicates that the borough will need to retain a significant quantity of industrial land in order to meet the forecast demand for industrial uses, storage, transport, waste and related infrastructure over the next 15 years. The Strategic Industrial Location is also designated in the London Plan.

8.19 The Employment Land and Premises Study recommends that the majority of the land currently designated as SIL and LSIA is retained in its current designation.

8.20 Looking broadly across the industrial areas in the borough:

Question 4

Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Areas, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

Question 5

Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?

8.21 Note: the specific areas and management of the SIL and LSIA are discussed in detail in the two sections below. The protection of wharves and waste sites, and New Covent Garden Market, are discussed in section EI7 below.

8.2.2 Strategic Industrial Location

8.22 The Queenstown Road Strategic Industrial Location is designated in the London Plan and London Plan policy 2.17 sets out the type of uses that are allowed to be developed in SILs. The Stewarts Road Study, undertaken in 2010, identified some opportunities to optimise the operation of the SIL, including:

- increasing access into the SIL and improving connectivity;
- introducing an Industrial Business Park designation along the west and north west edges of the SIL in order to create a transition zone between the residential uses that adjoin the area and the heavier industrial and transport uses that create unneighbourly impacts;
- improving the quality of the public realm in and around the SIL, and making the sites in and around the SIL more prominent.

8.23 Since the study was carried out, there have been few significant changes to the SIL due to a lack of significant investment opportunities. The SIL, however, continues to play a significant role in servicing central London areas as well as the borough and the ELPS found that the area is well occupied and vibrant, and is considered to function well as a key area of industrial, warehousing, and office employment land in the Borough. There have been more significant changes in the surrounding areas, as well as forthcoming developments, including:

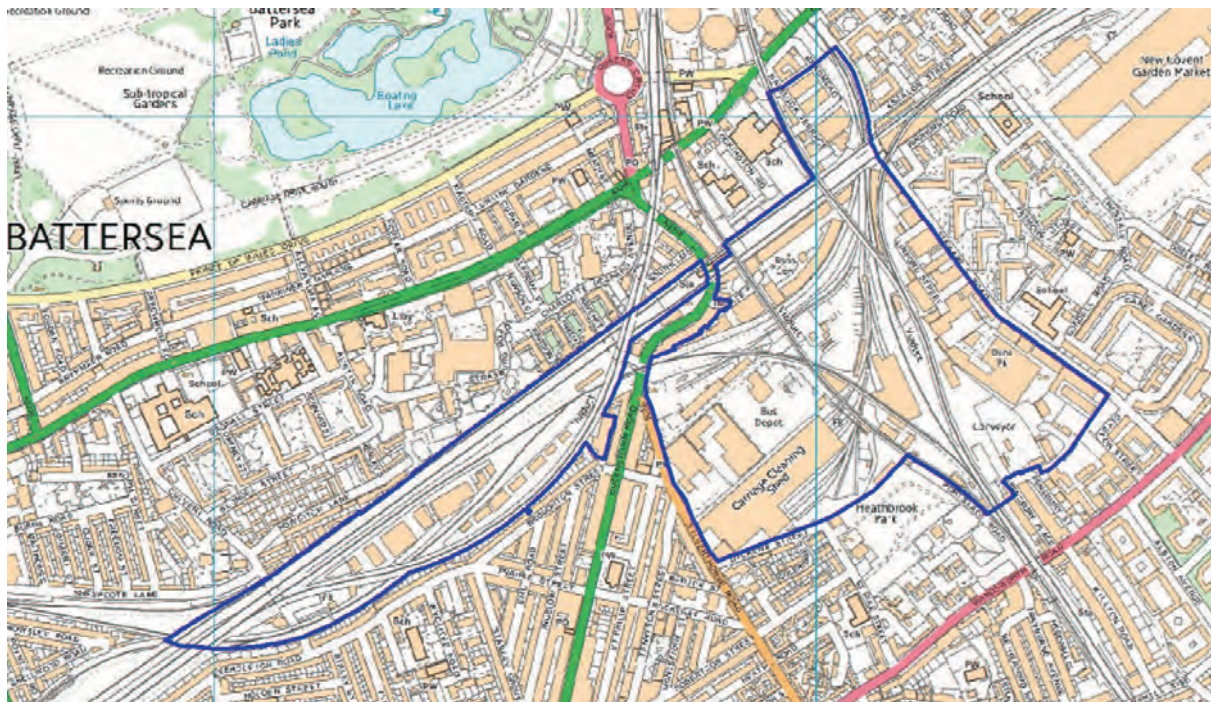
- The redevelopment of Patcham Terrace to the north of the SIL;
- The development of a new site for the Royal Mail Group in Pensbury Place (across the borough boundary in Lambeth), relocated from a site in Nine Elms;
- The major developments underway including the forthcoming town centre at Battersea Power Station and further developments north east at Nine Elms and Vauxhall;
- The extension of the Northern Line, with a new Battersea station to the north of Battersea Park Road.

8.24 Given the future demand for industrial land, the relative success of the SIL as an industrial area, low vacancy rates, and its strategic importance and location, the Employment Land and Premises Study recommends that the boundary and extent of the SIL is retained in the current review of the Local Plan.

Question 6

Is it appropriate to retain the existing designation as Strategic Industrial Location for the entirety of the Queenstown Road area, as set out in the map below?

Map 8.1 Queenstown Road SIL



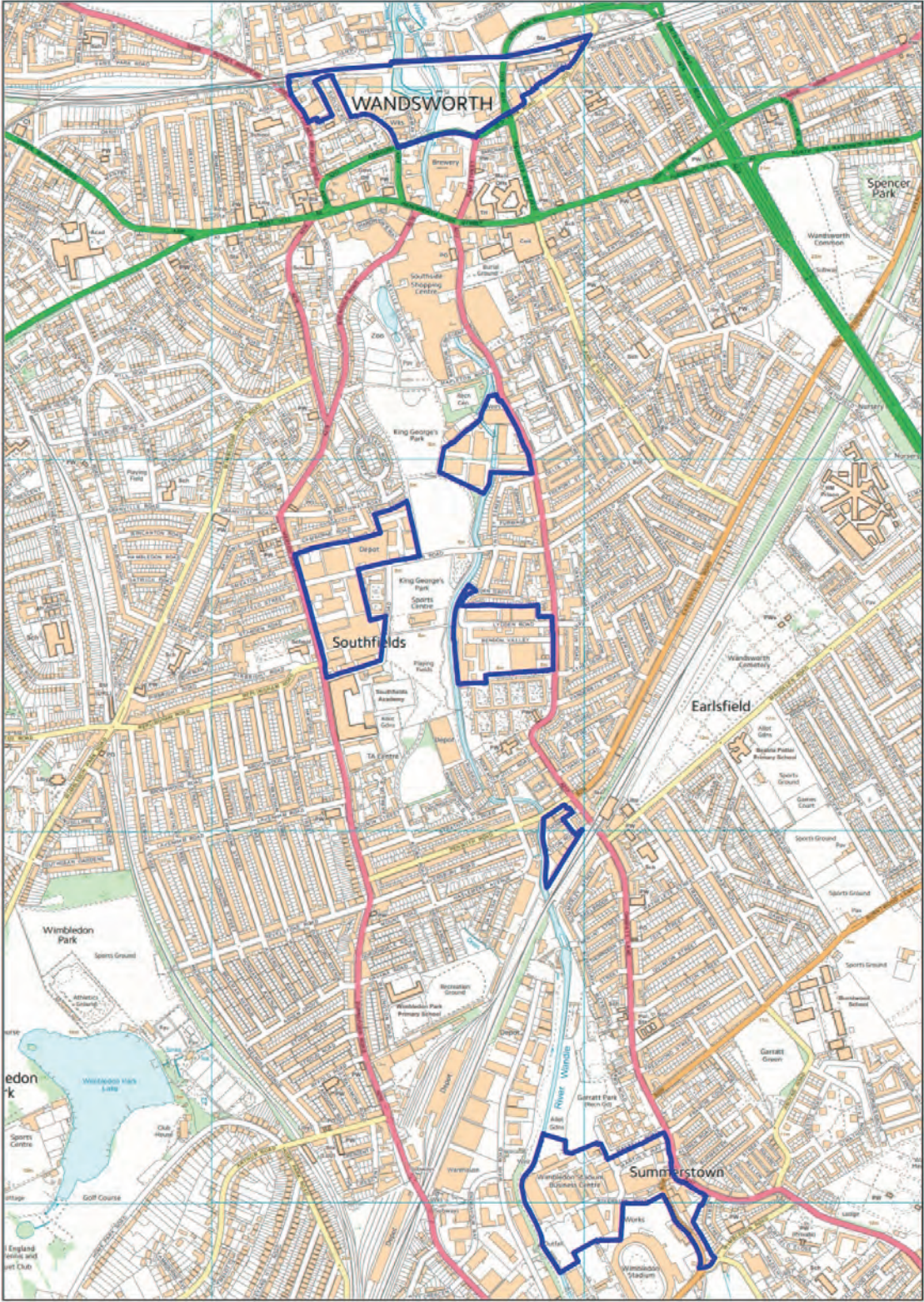
8.25 Note: the management of uses in the SIL, including the potential to designate areas of the SIL as Industrial Business Park, are discussed in detail in section EI7 below.

8.2.3 Locally Significant Industrial Areas

8.26 There are six industrial areas in the borough that are currently designated as Locally Significant Industrial Areas (LSIA) in the Local Plan. These areas are all located in the Wandle valley, from the Central Wandsworth LSIA in the north to the Summerstown LSIA in the south. Combined, these areas cover just under 38 hectares of land, though they vary in size. Generally the vacancy rates in these areas are very low. Most of the uses tend to fall within the B1c, B2 or B8 use classes or related *sui generis* uses, with some variation in particular areas.

Area	Size
Summerstown	10.1
Old Sargeant	3.5
Kimber Road	7.2
Central Wandsworth	11.1
Bendon Valley	4.9
Thornsett Road	1.1
Total	37.9

Map 8.2 Locally Significant Industrial Areas



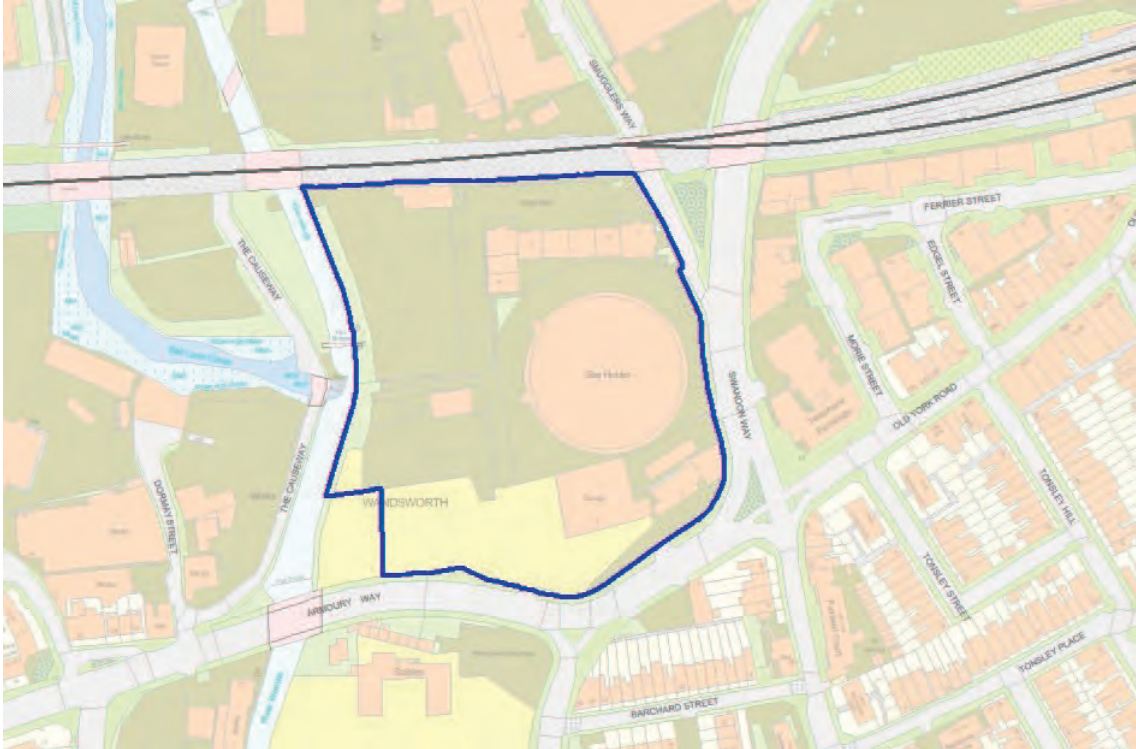
8.27 Some representations made during the Regulation 18 consultation suggested specific areas or sites within LSIA for potential redevelopment, generally seeking a broader mix of uses including residential. These were:

- Former Bingo Hall and Riverside Business Centre, Bendon Valley LSIA
- Area to the north of Lydden Road, Bendon Valley LSIA
- Panorama Antennas, 61-63 Frogmore, Central Wandsworth LSIA
- Ferrier Street Industrial Estate, Central Wandsworth LSIA
- Point Pleasant Works, Putney Bridge Road, Central Wandsworth LSIA
- Summerstown LSIA

8.28 The former bingo hall is currently occupied by a trampolining centre (use class D2), and is the only one of the areas suggested that has a large single-use site that is not an industrial or business use. The other areas identified have low vacancy rates and are mainly occupied by various industrial and storage uses. The Panorama Antennas and Ferrier Street sites both feature purpose-built industrial units, although it is recognised that these may need significant investment in forthcoming years. The Riverside Business Centre and the area to the north of Lydden Road contain older industrial buildings with a mix of SMEs in generally smaller premises. The Summerstown LSIA is may see significant redevelopment nearby on the Wimbledon stadium site and surrounding areas, subject to planning permission for this site (which is located in the London Borough of Merton); this is the largest LSIA in the borough and has a wide variety of industrial and distribution uses, generally on smaller sites.

8.29 The ELPS identified two areas within LSIA that had potential for new development and intensification: the Wandsworth gasholder site, which the ELPS found to be of notably poorer environmental and built quality and inefficiently used, and the former Bingo Hall site in Bendon Valley which the ELPS identifies as an opportunity for intensification and redevelopment. Internal meetings with the Council's property section have also suggested that there may be opportunities to consolidate the operations on the Frogmore and Causeway Island depots or that the requirement for this site for its current use may reduce due to a reconfiguration of the wider operational requirements of the Council. This is reflected in the ELPS which recommends that the Frogmore complex could be retained whilst there is still a requirement for its operational use, although recognises that the complex is not intensely used. The Council's use of the Frogmore complex is most appropriately categorised as a non-core industrial use, given its utility-like functions.

Map 8.3 Wandsworth Gasholder



Map 8.4 Former Bingo Hall, Bendon Valley



8.30 The Central Wandsworth LSIA is within a wider area where there is ongoing change and improvements, with redevelopment of significant sites in the town centre including the former Ram Brewery and major development to the north on either side of the Wandle Delta. The reconfiguring of the Wandsworth town centre gyratory system will also result in significant improvements to the local environment and would require some land take from the southern end of the LSIA. There are also wider strategic objectives in this area set out in the Core Strategy, notably improving access to the Wandle and the Thames. The gas holder site is subject to a protection zone by the Health and Safety Executive, which restricts occupation of development on surrounding sites; re-designation of this site would aid in facilitating the decommissioning of the site and removal of this zone and may assist in unlocking the site due to potential decontamination costs.

8.31 There may also be significant development around the Summerstown LSIA with the proposed redevelopment of the Wimbledon Stadium and surrounding sites (located in the London Borough of Merton), subject to planning permission. Unlike the sites identified above in the Bendon Valley and Central Wandsworth LSIA, the Summerstown LSIA does not feature any significant opportunities for intensification; this area has a strong mixture of businesses of varying sizes, low vacancy rates and is well supported by the Garratt Business Park Business Improvement District.

8.32 Given the issues explored above:

Question 7

Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

Question 8

Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA? If so, which areas and why?

Question 9

Are there any other sites or areas within other LSIA that should be prioritised?

Question 10

Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?

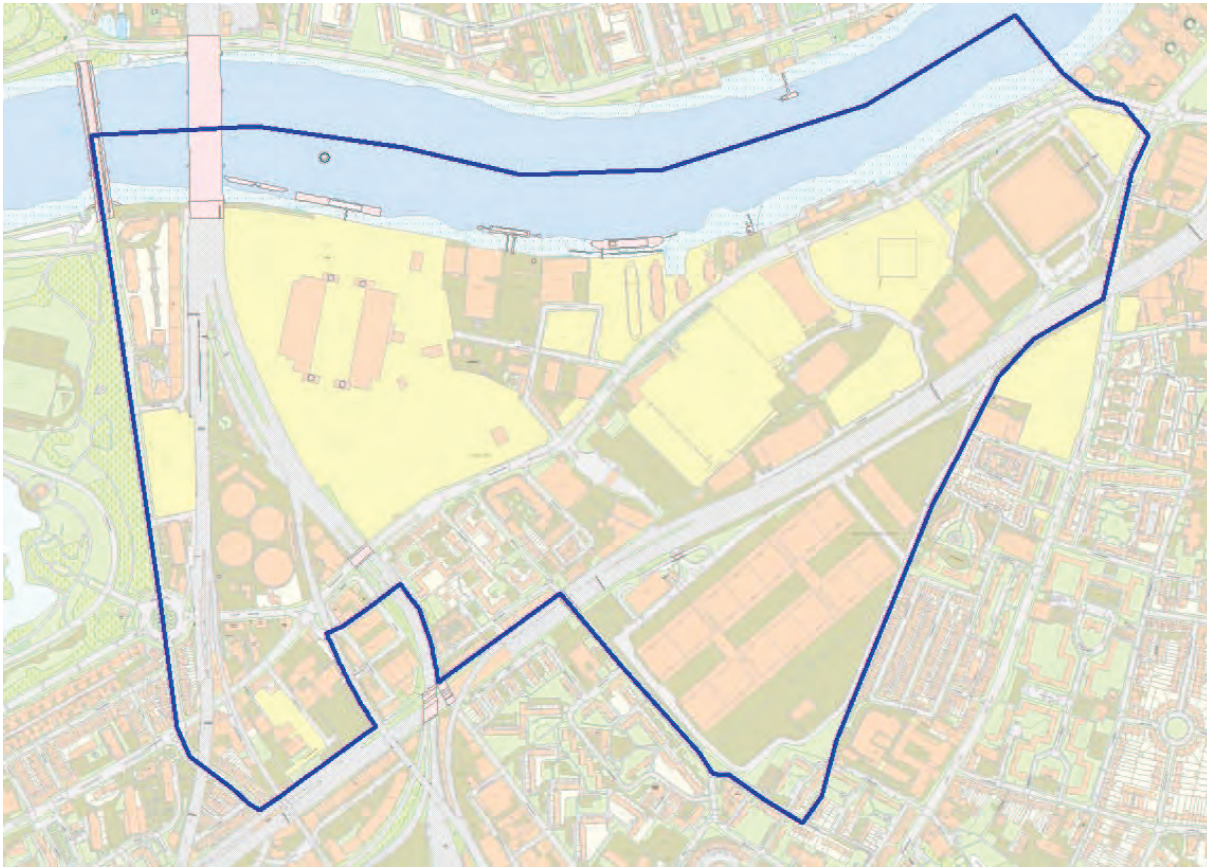
8.33 Note: the management of uses in the LSIA's is discussed further in section EI7 below.

8.2.4 Nine Elms

8.34 The Nine Elms area of the borough forms part of the Vauxhall, Nine Elms, Battersea Opportunity Area, which is identified in the London Plan and the Local Plan, with development of the area guided by the Opportunity Area Planning Framework which was adopted in 2012. Large parts of the area have undergone redevelopment or are under construction, and most of the remaining industrial and distribution sites in the area have secured planning permission to redevelop for other uses.

8.35 Some pockets of industrial and distribution use remain in the area. However, the wider VNEB opportunity area is at an advanced stage of planning and development and has benefited from the principle of stable and long-term plan-making in bringing forward this strategically important area.

Map 8.5 CAZ in Nine Elms



Question 11

Should the Council continue to support the wider regeneration objectives for Nine Elms and to only protect industrial and distribution sites in the SIL?

8.36 Note: It is recognised that New Covent Garden Market (NCGM) has an important distribution function and is located in Nine Elms. The policy approach to NCGM is discussed further in section EI7 below.

8.2.5 MUFIEAs

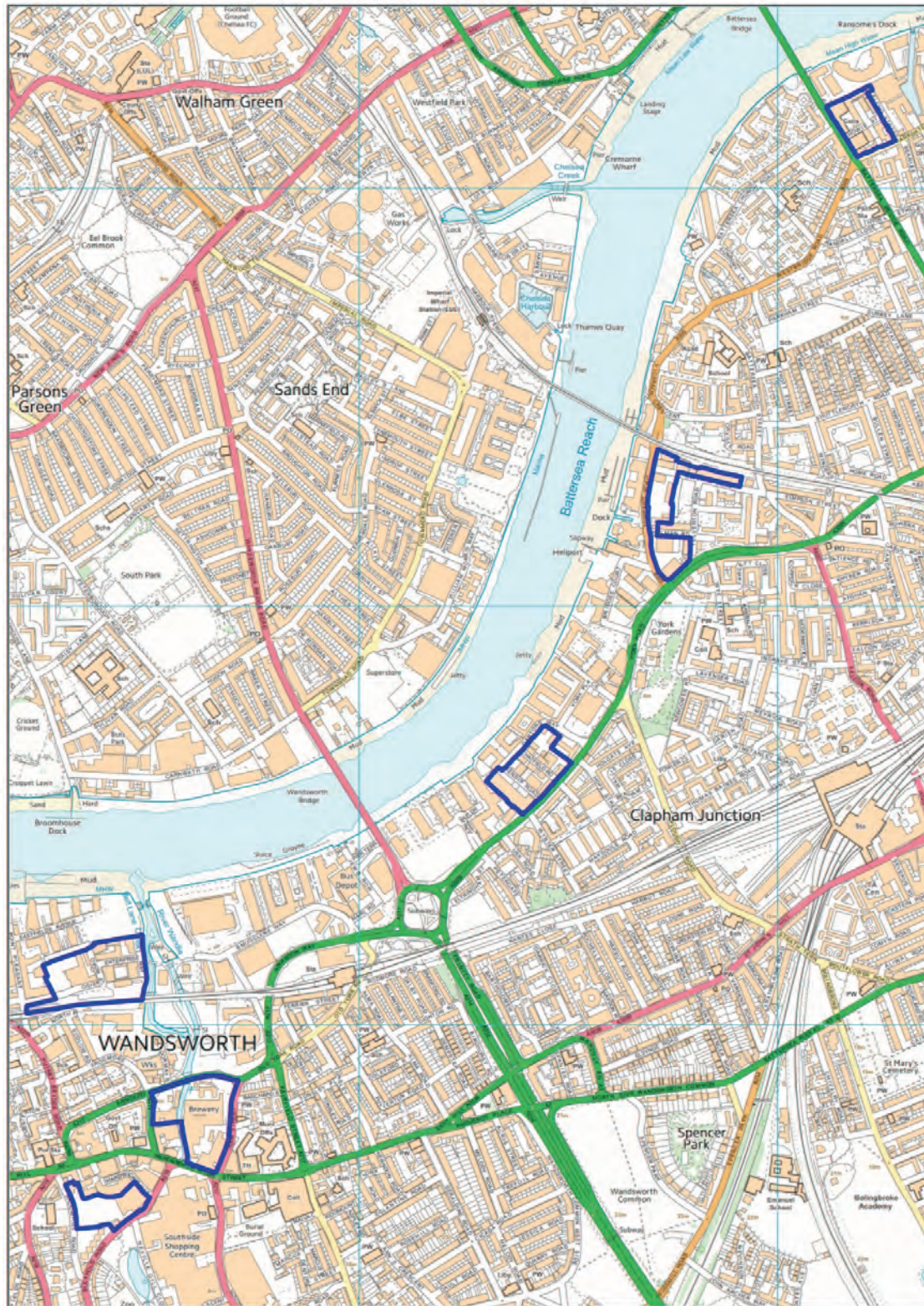
8.37 The designation of Mixed Use Former Industrial Employment Areas was initially carried out with the adoption of the original Core Strategy in 2010 and the DMPD in 2012. This followed the findings of the previous Employment Land and Premises Study by DTZ (2010) which at that time identified that there was an adequate supply of employment premises in the borough to meet demand. Some MUFIEAs, notably Wandsworth business village, the former Ram Brewery, and Osiers Road, have seen

significant redevelopment of most sites either completed or underway. Most other MUFIEAs include sites with planning permission although some still contain large sites with substantial quantities of industrial or distribution floorspace that have not been developed since the MUFIEA designation was introduced in 2010. In the review of the Local Plan that was adopted in March 2016, the Lombard Road/York Road Riverside Focal Point was designated, meaning that all existing MUFIEAs are within or partially within a focal point or town centre. The wider spatial and regenerative aims for Wandsworth town centre and the focal points near the Thames, and the stage of development of most of the MUFIEA sites, indicate that these areas should continue to be prioritised for release for non-industrial uses, as recommended in the Employment Land and Premises Study.

Question 12

Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

Map 8.6 Mixed Use Former Industrial Employment Areas



8.2.6 Industrial clusters and undesignated sites

8.38 The ELPS has identified a range of clusters over 0.25 Ha in size that include significant quantity of industrial floorspace. In addition to this, the Council has undertaken survey work to identify smaller employment sites in the borough. Maps of these clusters and sites are set out in Appendix 1.

Cluster	Description
C20: 71 Warriner Gardens (Old Imperial Laundry)	Office and light industrial
C21: 99-109 Lavender Hill Road (Battersea Business Centre)	Industrial
C23: Smugglers Way, Marl Road, Jews Row	Industrial, waste, transport, retail
C24: Jaggard Way	Industrial
C25: Site adj. to 282 Mitcham Lane	Industrial
C26: Wimbledon Sewing Machine, Balham Card and Chetwode Road sites	Industrial
C27: NJB Recycling, Trewint Street	Industrial
C28: Railway Arches, Winthorpe Road	Industrial
C29: Irene House, 215 Balham Road, 25 Boundaries Road	Storage and office
C31: 190-194 St Anns Hill, Wandsworth	Light industrial
C32: College Mews, St Anns Hill, Wandsworth	Light industrial

8.39 Of these clusters, 71 Warriner Gardens has planning permission to redevelop roughly half of the site for residential use (see reference 2013/6478). 282 Mitcham Lane would appear to be vacant and of poor quality, and is tightly surrounded by residential uses.

8.40 Generally these sites provide employment floorspace for SMEs, with a variety of industrial and distribution uses. Some sites also include an element of office or retail floorspace. Some sites, such as the railway arches near Winthorpe Road, may be unsuitable for residential development due to the quality of the surrounding environment. These sites generally tend to have lower public transport accessibility levels than sites in town centres, suggesting that they serve a primarily local market. These sites may

also offer a more affordable form of employment floorspace than comparable sites in better connected or more attractive locations, although in some instances the proximity to established residential uses may cause conflicts.

8.41 The ELPS identifies that there are other employment premises located in railway arches as well as the Winthorpe Road area, and that the typical inability to convert railway arch premises to residential uses means that they are likely to remain commercial by nature and continue to provide accommodation for B-use class SMEs, even within desirable locations such as the VNEB OA.

8.42 Current policy in the Local Plan 2016 only protects those employment sites that are in the Thames Policy Area, and allows industrial uses in the Thames Policy Area to be replaced with office floorspace.

Question 13

Should the clusters and sites identified above be protected for industrial and distribution uses?

Question 14

Should this include specific protection for such uses located in railway arches?

Question 15

If so, should the Local Plan allow change or redevelopment to non-industrial uses provided that there is no demand for the industrial or distribution use? Should redevelopment of these sites prioritise alternative employment uses?

8.2.7 Re-designation of Industrial Land and Demand Forecast

8.43 As noted in section EI1 above, the Employment Land and Premises Study projects that the balance between supply and demand for industrial land in the borough up to 2030 could reduce demand for industrial land by 9.5 hectares (in a low growth scenario) or increase demand for industrial land by 8.2 in a high growth scenario. However, in looking at individual sites, the prospect for providing industrial uses and

the wider strategic aims (for example in the Vauxhall, Nine Elms, Battersea Opportunity Area), the study recommends that up to 17.5 hectares of land currently used for industrial purposes could be re-designated for other uses. This would clearly exceed the loss of 9.5 hectares set out in the low growth scenario.

8.44 The reasons for prioritising particular areas for re-designation for non-industrial uses are discussed in detail in the relevant sections above.

8.45 Looking at the overall quantity of industrial land that the Employment Land and Premises Study recommends for re-designation and comparing this to the demand forecasts:

Question 16

Are there reasonable justifications for exceeding the low growth demand forecast, either for individual sites or cumulatively? Should any of the sites recommended for re-designation in the Employment Land and Premises Study be retained for industrial and distribution use?

Question 17

Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?

8.3 EI3 – Protecting Office Floorspace

8.46 Wandsworth's stock of existing office floorspace is spread throughout the borough. The five town centres have a significant proportion of the office floorspace in the borough, with other offices located in the Focal Points along the Thames, in smaller clusters near transport links and main roads, and individual sites elsewhere. There are also some offices in the SIL and LSIA's, either associated with industrial uses or long-standing offices that were developed prior to the more robust policy approach to industrial areas taken in 2010.

8.47 The Employment Land and Premises Study has identified four clusters of employment land that include office floorspace. In addition to this, the Council has undertaken survey work to identify smaller employment sites in the borough. Maps of these clusters and sites are set out in Appendix 1.

Cluster	Description
C20: 71 Warriner Gardens (Old Imperial Laundry)	Office and light industrial
C22: Cotswold Mews, Battersea Square	Office
C29: Irene House, 215 Balham Road, 25 Boundaries Road	Storage and office
C30: Cloisters Business Centre	Office
C33: Hillgate Place, Balham Hill	Office
C34: Princeton Court, Felsham Road, Putney	Office
C35: 57 Putney Bridge Road	Office
C36: 116 & 118 Putney Bridge Road	Office
C37: 70 Upper Richmond Road	Office
C38: Hyde Park House, 5 Manfred Road	Office
C39: Triangle House, 2 Broomhill Road	Office
C40: Smiths Yard, Earlsfield	Office
C41: 124 Latchmere Road	Office
C42: 187 – 207 Lavender Hill	Office

8.48 Cotswold Mews has planning permission for redevelopment for residential use (see reference 2012/3275).

8.49 The borough has seen a significant number of applications for prior approval to change the use of offices to residential use, in accordance with the permitted development introduced in May 2013 and made permanent from 2016. For some sites, this has directly resulted in significant loss of office provision (for example at Plantation Wharf); for other sites the prior approval has been used to secure full planning permission with a much smaller element of office floorspace than would otherwise be required by the Local Plan policies, for example on sites along the Upper Richmond Road in Putney town centre. Should all unimplemented prior approvals be carried out, this would result in the loss of around 48,500 sq ms of office floorspace.

8.50 The pipeline of development of new office floorspace is significant, with planning permission granted for around 147,000 sq ms of new office floorspace. A large proportion of this is located in the Nine Elms area, with this office floorspace likely to be targeted

towards large national and multi-national businesses and securing high rents. Other recent and forthcoming office floorspace is primarily located in the Focal Points and MUFIEAs, providing smaller-scale offices alongside mixed use development.

8.51 The Employment Land and Premises Study forecasts a strong positive demand for new office floorspace, both for the local/sub-regional market and for the national/international market (which it sees as being met by the pipeline of large-scale offices in Nine Elms).

8.52 London Plan policy 4.2 sets out the broad approach that should be taken to planning for offices and London Plan policy 4.3c requires Local Plans to consider the protection for small scale offices within the CAZ.

8.53 The NPPF (para 22) 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.

8.3.1 Employment Protection Areas

8.54 The adopted Local Plan seeks to protect office floorspace in Town Centres and the entirety of the Thames Policy Area. Some parts of the Thames Policy Area do not feature a significant quantity or clusters of office floorspace; other parts of the area – particularly around Focal Points – have a stronger employment market. There are offices situated elsewhere in the borough, particularly serving local markets and providing floorspace for SMEs, that have good public transport accessibility or are located close to town centres and local centres.

Question 18

Should the Local Plan seek to protect offices in the following locations:

- **Town Centres;**
- **The part of the Central Activities Zone that is in Nine Elms;**
- **Focal Points;**
- **Smaller office clusters near transport interchanges or on the edge of town centres?**

Question 19

Are there other parts of the borough where existing offices should be protected?

8.3.2 Article 4 Direction

8.55 Separately to this consultation, the Council are intending to implement an Article 4 direction covering specific parts of the borough in order to support the emerging policy approach and to assist in retaining well-located and good quality office floorspace for which there is demand. A separate consultation is being carried out on the proposed Article 4 Direction and the areas this is proposed to cover. For more information see www.wandsworth.gov.uk/article4.

8.3.3 Smaller Offices above Shops and in Town Centres

8.56 Some parts of the borough, notably in town centres, local centres and along main roads, have smaller offices (either in A2 or B1a use) located above shops and along street frontages. Due to their smaller size, layout, and the age of the properties, these often provide less expensive business floorspace than purpose-built office buildings. In some instances (eg solicitors providing legal services) these businesses have a specific function serving the local area. The adopted Local Plan protects A2 uses above shops and outside protected shopping frontages in Town Centres.

Question 20

Should the Local Plan seek to protect B1a and A2 uses located above shops and outside protected shopping frontages? If so, which locations would be most appropriate to protect?

8.4 EI4 – Meeting Demand for New Employment Floorspace

8.57 The NPPF identifies offices as a main town centre use, and requires Local Plans to allocate sites to meet the scale and type of offices in town centres (alongside other town centre uses). Local Planning Authorities should consider the need to expand town centres to ensure a sufficient supply of suitable sites and to allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre. If sufficient town centre sites cannot be identified, the Local Plan should set policies for meeting the identified needs in other accessible locations.

8.58 The Employment Land and Premises Study broadly separates the demand for office floorspace in the borough into two categories:

- National and international office floorspace, aimed at large businesses and other occupiers, seeking a central London location;
- Local and sub-regional office floorspace, aimed at small and medium-sized businesses and other occupiers, and serving primarily local and London-wide and regional markets.

8.4.1 National & International Offices

8.59 The ELPS recommends that the significant quantities – in the order of 205,000 sq ms – of large-scale office floorspace coming forward in Nine Elms is sufficient to meet the demand for national and multi-national office floorspace in the borough. This floorspace supports the approach of the London Plan, which seeks to meet the need of the central London office market and to enhance the unique international, national and London-wide roles of the CAZ.

Question 21

Should the Local Plan continue to support the development of large-scale offices in Nine Elms, in particular at the emerging Battersea Power Station town centre?

Question 22

Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

8.4.2 Local and Sub-regional Offices

8.60 The ELPS identifies a need for an additional 31,700 sq ms to 65,800 sq ms of office floorspace over the next 15 years to serve the local/sub-regional office market. The ELPS also recognises that there are currently constraints on development opportunities in the borough's existing five town centres for significant new office development. The current pipeline of development for new office floorspace is primarily focussed in the Nine Elms area rather than serving the local and sub-regional market. will not provide substantial quantities of new office floorspace to serve the local and sub-regional market. Some sites that may otherwise have provided new office floorspace in recent years have been redeveloped without an employment focus, primarily due to the impact of permitted development; this has had a particular impact in Putney town centre in the area along Upper Richmond Road. In recent months a number of

developers have suggested proposals for new office development; these have primarily been located outside town centres in the Thames Policy Area and the industrial areas currently designated as SIL and LSIA.

8.61 The development of Crossrail 2, which is intended to include stations at Clapham Junction and either Balham or Tooting, could see significant land areas released for redevelopment as well as encourage and enable redevelopment of sites nearby, which could include office floorspace. Crossrail 2 is expected to be delivered by 2030, at the end of the plan period for this review, although some sites may come forward in advance of this.

8.62 Given the relative scarcity of immediately available sites for office development in town centres, the Council intends to carry out a detailed assessment of sites within and on the edge of the borough's town centres, and other sites in well-located areas, to inform the next stage of this review of the Local Plan. The Council have recently undertaken a call for sites which will be used to inform the site assessment. It is intended to undertake this assessment looking primarily at the following areas, reflecting the sequential approach set out in the NPPF:

- Town Centres;
- Edge-of-centre sites close to the existing town centres, in particular areas to the north of Wandsworth town centre;
- Sites located close to existing or forthcoming transport interchanges, in particular those close to Local Centres and in the CAZ;
- Industrial areas that the current review of the Local Plan may re-designate for other uses;
- Sites in and around Focal Points.

Question 23

Are there specific sites in or on the edge of the borough's town centres, or in the other areas listed above, that have the potential to contribute to the demand for local and sub-regional office floorspace?⁽⁵⁾

5 Any sites already submitted as part of the Call for Sites undertaken between June and September 2016 will be taken into consideration as part of this site assessment exercise.

Question 24

Are the areas listed above the most appropriate for new office development?

Question 25

Are there other areas or sites that the Local Plan should seek to designate for new office development?

8.4.3 Employment Intensification Areas

8.63 The ELPS identifies two substantial sites (the Wandsworth gas holder site and the former bingo hall in Bendon Valley) in the borough's LSIAs which are not currently making the optimal contribution to meeting the demand for industrial floorspace. The ELPS recommends that these sites could be re-designated for a mix of uses in order to intensify the employment uses on these sites, and that, through careful planning, these sites could provide light industrial floorspace alongside SME workspace, offices and other uses, as well as contributing to wider strategic objectives and place-making initiatives.

Question 26

Should the Wandsworth gas holder site and the former bingo hall site in Bendon Valley be re-designated as Employment Intensification Areas, seeking increased quantities of employment floorspace alongside other uses?

Question 27

Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?

Question 28

Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?

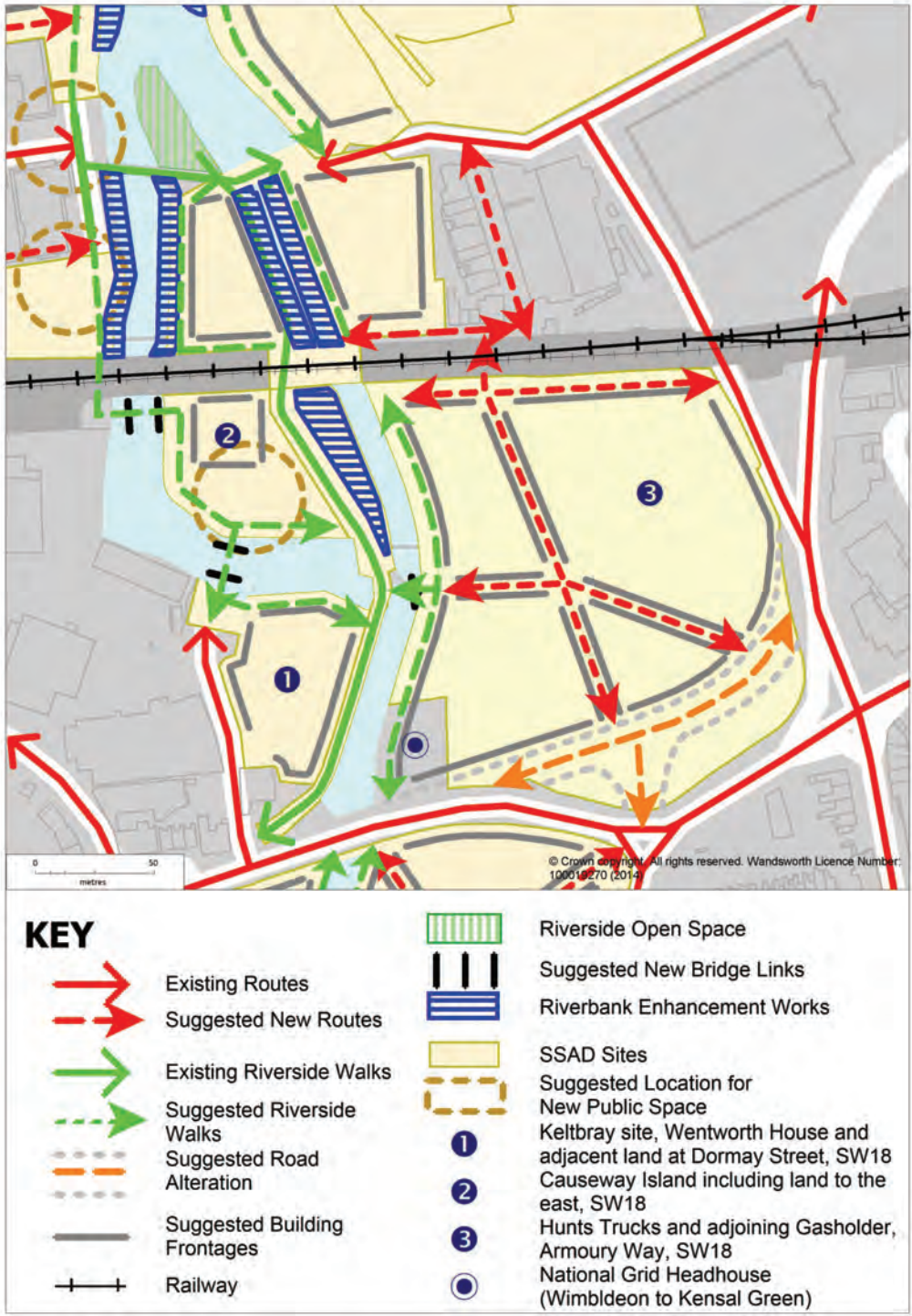
Question 29

What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?

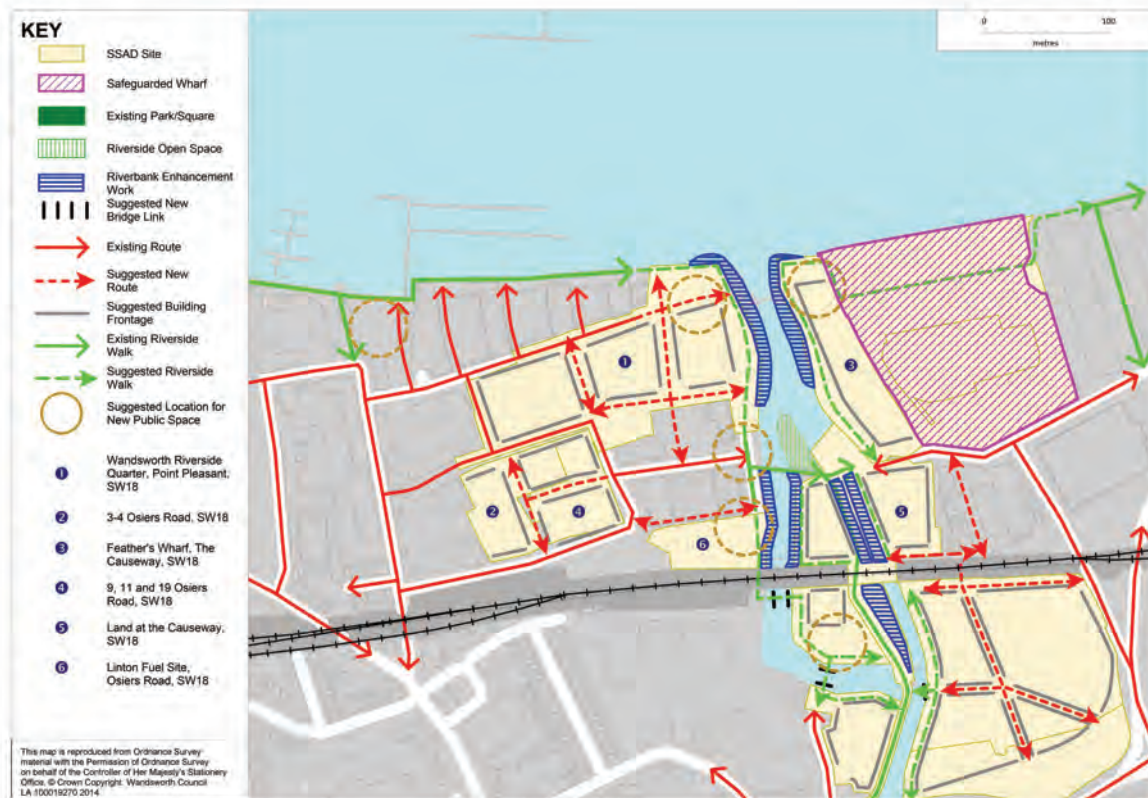
8.4.4 Area Spatial Strategies and Site Allocations

8.64 The Adopted SSAD 2016 includes an Area Spatial Strategy for the land between the Armoury Way and the railway in the Central Wandsworth LSIA, which links to an Area Spatial Strategy for Wandle Delta and land north of the railway.

Map 8.7 Adopted Area Spatial Strategy for Land Between Armoury Way and the Railway



Map 8.8 Adopted Area Spatial Strategy for Wandle Delta, Land North of the Railway



8.65 The strategies primarily focus on access, routes through and around the sites and design principles for these areas. Each strategy is supported by specific site allocations. In the Central Wandsworth LSIA there are three site allocations, for the gasholder and Hunts Trucks, Causeway Island, and the Keltbray site and Wentworth House. These site allocations designate the sites for a particular use and set out design principles for the site. As noted in section EI2 above, there are wider spatial changes to this area that are due to come forward including redevelopment of the former Ram Brewery and reconfiguration of the Wandsworth town centre gyratory system.

8.66 Given the recommendation in the ELPS to re-designate the gas holder site for alternative uses, the Area Spatial Strategy and site allocations are being reviewed as part of the current Local Plan review.

Question 30

Should the reviewed Area Spatial Strategy and site allocations address all or some of the following issues:

- **Pedestrian and cycle access to the Thames from Wandsworth Town Centre;**
- **Access to the Wandle;**
- **The creation of new public spaces and routes through the area;**
- **Enhancement of the Wandle and its banks as a resource for wildlife;**
- **Biodiversity and environmental issues;**
- **Layout of development;**
- **Mix and arrangement of uses across the area;**
- **Use allocations for individual sites;**
- **Analysis of the historic environment and character of the area;**
- **Place-making initiatives such as cultural uses and activities.**

Question 31

Are there any additional issues that should be addressed through the Area Spatial Strategy and site allocations?

Question 32

Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?

Question 33

Do the proposed routes and spaces set out in the adopted Area Spatial Strategy give the optimal arrangement for the area? Are there alternative approaches that should be explored?

Question 34

Should a similar area spatial strategy and/or site allocation be set out for the former bingo hall site in Bendon Valley? If so, are there issues specific to this site that these should address?

8.5 EI5 – New employment development

8.5.1 Development Requirements

8.67 The adopted Local Plan sets criteria for the design, leasing and management of new employment floorspace in order to ensure that new employment premises are flexible for a range of occupiers and provide a good quality of accommodation. This covers office development as well as industrial and storage uses. The adopted policy sets out design requirements relating to:

- Floor plates, columns and partitions;
- Natural light;
- Size of units and the range of sizes available;
- Floor-to-ceiling heights;
- Power, servicing and loading;
- Floor loading capacities.

8.68 In addition to the above design requirements, the adopted policy also seeks:

- realistic rents;
- flexible leasing arrangements (taking account of the Code for Leasing and Business Premises in England and Wales 2007); and
- information about management arrangements.

Question 35

Should the Local Plan continue to specify requirements relating to design, rent levels, leasing and management of new employment premises? If so, are there any requirements that should be set in addition or instead of those given above?

8.5.2 Large-scale Mixed Use Development

8.69 On large-scale mixed-use development in the borough and elsewhere, there has been a tendency for requirements for new employment (and other non-residential) floorspace to be met through provision of this on the ground floor of new development, with upper floors dedicated to residential use. Whilst this can assist with creating active frontages, restricting employment uses to ground floors only may restrict flexibility and quality of employment floorspace and reduce opportunities for creating a hub of businesses or a focus to the business aspect of the scheme.

8.70 Where high density schemes are not well-designed, if employment floorspace and residential uses are developed in close proximity, this can also result in uncomfortable degrees of overlooking, the potential for disturbance, and increased need for strict management and operating times of employment premises.

Question 36

On large-scale mixed use schemes, should the Local Plan require the design of the development to demonstrate that employment and residential uses complement each other, that the clustering and arrangement of employment premises is designed into the scheme, and that employment provision is not solely restricted to the ground floor? Are there other design and management issues that should be taken into account for large-scale mixed use schemes?

8.6 EI6 – Affordable, creative and flexible workplaces

8.6.1 Regeneration Areas

8.71 The spatial strategy of the Core Strategy 2016 recognises the need to support regeneration initiatives in key parts of the borough, particularly in those areas where evidence indicates increased incidences of deprivation primarily in some parts of Tooting, Roehampton and Battersea. One aim of the regeneration initiatives being undertaken by the Council and its partners is to increase opportunities for employment in these areas. At Roehampton, for example, the regeneration project will include 400 sq ms of dedicated employment floorspace for to provide local jobs and support the Roehampton economy.

Question 37

Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?

Question 38

If so, should this floorspace be of a particular type or size?

8.6.2 Creative and Cultural Industries

8.72 AECOM's Employment Land and Premises Study recognises the contribution made to the borough's economy by the creative industries and the culture sector, with the arts, entertainment and recreation sector employing about 6,500 people in the borough, 5.7% of the total workforce. Alongside the economic and employment contribution, the creative and cultural industries also have an important role to play in reinforcing the cultural identity of the people and places within the borough, and in helping to shape and give character where new development is coming forward. The development of a cultural strategy for Nine Elms in co-ordination with other partners is one example of this work. The Council is also developing an arts strategy and are looking to bring forward cultural plans in areas where significant change and development is planned. The borough hosts a broad range of creative and cultural organisations, from national institutions such as the Royal Academy of Dance and the Royal Society for the Arts, internationally-renowned creative businesses such as Foster + Partners and Vivienne Westwood, performance spaces such as the Battersea Arts Centre and Theatre 503, as well as artists' studios, set designers, film makers, recording studios and record labels, creative tech firms and other smaller creative businesses and individuals. There are also a range of festivals, events and performances hosted in the borough's parks, streets and cultural spaces held throughout the year.

8.73 The London Plan recognises the importance of creative and cultural businesses in London and policy 4.6 of the London Plan seeks to support the continued success of London's diverse range of arts and cultural enterprises. In preparing Local Plans, boroughs should enhance and protect creative work and performance spaces, designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, provide arts and cultural facilities in major mixed use developments and seek to enhance the economic contribution and community role of arts and cultural facilities.

8.74 GLA Economics Working Paper 70, The Creative Industries in London (October 2015), suggests that clustering and agglomeration of creative industries may assist in boosting productivity within and across creative sectors, and may assist in stimulating local demand for products and services. For the creative sector itself the study suggests that clustering may increase the ability to attract more customers as well as give greater access to specialist goods/services and labour markets. The Artists' Workspace Study (GLA, 2014) highlights the on-going loss of artists' studios and other workspaces as well as issues relating to affordability for this particular part of the creative sector.

Question 39

Should the Local Plan specifically seek creative workspace as part of large-scale employment developments? Should the Local Plan require developers to ensure that affordable creative workspace is provided as part of this? If so, how much and what mechanisms should be used to secure this?

Question 40

Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal, development or exhibition space) as part of large-scale redevelopments? If so, should this be targeted at specific areas? What mechanisms should be used to secure this?

8.6.3 Affordability

8.75 The Employment Land and Premises Study has identified that rents for both offices and industrial premises in the borough have rapidly increased in recent years. This is likely to be due to both an increase in the London business economy as well as the contraction in supply of office floorspace and industrial land that has been seen in the borough. Respondents to the Regulation 18 stage consultation, notably the Wandsworth Chamber of Commerce, have raised concerns regarding the availability and affordability of business premises in the borough.

Question 41

Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?

Question 42

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

Question 43

How should affordable workspace be secured – for example through s106 agreements?

Question 44

Should managed workspace (see below) be considered to be affordable, or are there other criteria that should be set – for example setting a maximum percentage of market rent?

8.6.4 Managed Workspaces

8.76 In recent years there has been steady growth in the managed workspaces sector. There are a wide variety of managed workspace models, however they generally aim to provide workspace for small and micro businesses, often with some element of business development or support. These are usually for office (B1a) or light industrial (B1c) uses. Policy DMI4 in the adopted Local Plan encourages developers to come forward with development partners for the management of flexible employment floorspace.

8.77 Managed workspace premises can take a wide variety of forms, with some models reflecting a cheaper rent cost or more flexible leasing arrangements (usually for a shorter time period) and more frequent rental payments, which assist in minimising the financial risk for smaller or newer businesses. Other models offer shared workspace, rented at an hourly or daily rate, and the opportunity to lease meeting rooms or other facilities that give flexibility and minimise the overall cost for business occupiers. Some managed workspace providers focus on community engagement or have an ethical remit, cross-funding cheaper or subsidised workspace for specific organisations through charging higher rents for more established businesses. Others offer incubator space, providing mentoring and business development support alongside workspace.

8.78 There are a number of examples of these types of managed workspaces operating across the borough and elsewhere in London, and a number of developers have shown interest in bringing forward further schemes in pre-application discussions. The market for managed workspace is more mature for office-based businesses than industrial-type occupiers.

Question 45

Should the Local Plan require managed workspace to be provided on new developments in the borough?

Question 46

If so, should this be on developments of a particular type or size, and in particular parts of the borough?

Question 47

How should managed workspace be secured – for example through s106 agreements?

8.7 EI7 – Managing land for industry, distribution and waste

8.7.1 Queenstown Road SIL

8.79 The London Plan (policy 2.17) requires boroughs to promote, manage and protect the Strategic Industrial Locations as London's main reservoirs of industry and related capacity. Local plan policies should be based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities including access improvements. In SILs, the London Plan only supports development proposals that:

- fall within the broad industrial type activities;
- are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or development plan document;

- are for employment workspace to meet identified needs for SMEs or new emerging industrial sectors;
- are for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.

8.80 The VNEB Opportunity Area Planning Framework (OAPF) states that Stewarts Road industrial area will be retained as strategic industrial land (SIL) where intensification of employment uses will be encouraged through identifying opportunities for redevelopment, improving access to key sites and upgrading the quality of the public realm.

8.81 The Employment Land and Premises Study identifies that the SIL is broadly performing well as an industrial area, with low vacancy levels and a broad range of industrial and other appropriate uses (including waste processing, transport maintenance, aggregates management and distribution uses) working successfully alongside one another.

8.82 Whilst some individual sites have seen redevelopment in the SIL, there has not yet been a step-change in intensification of industrial uses since the adoption of the OAPF in 2012, and some aspects of the required improvements identified in the Stewarts Road study and reflected in the OAPF would require significant investment and co-ordination between existing occupiers, land owners, transport providers, developers and others that has yet to come to fruition.

8.83 The western edge of Queenstown Road SIL around Silverthorne Road is designated in the current Local Plan as Industrial Business Park (IBP). The London Plan states that IBPs are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. The London Plan also states that IBPs are not intended for primarily large scale office development and that office development in an IBP should not jeopardise local provision for light industrial accommodation where there is demand for these uses.

8.84 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.

8.85 One respondent⁽⁶⁾ to the Regulation 18 consultation suggested that the IBP area should be extended and that residential uses should be allowed within this area. Another respondent⁽⁷⁾ proposed that the designation of land in the SIL should more closely reflect the actual use of areas, including offices.

8.86 The ELPS recommends that, given the extent of change to the areas surrounding the Havelock Terrace part of the SIL, and in particular the increased connectivity that will be provided by the Northern Line extension, this area may have the potential to provide a significant increase in employment floorspace and could be re-designated as Industrial Business Park in order to capitalise on these changes and to enable the development of a wider mix of business uses including B1b (research and development) and B1a (offices) alongside retained or replaced industry and distribution functions. This could also contribute to the clustering of small businesses, complementing the development of larger-scale office premises at Battersea Power Station as well as other smaller office locations nearby.

8.87 Existing Local Plan policy (DMI1) requires any redevelopment of existing B1(c), B2 and B8 floorspace to provide full replacement provision.

8.88 The Wandsworth Road Key Industrial and Business Area (KIBA) lies across the borough boundary in the London Borough of Lambeth, immediately adjoining the Queenstown Road SIL to the south east. This area is designated in Lambeth's Local Plan 2015; policy ED1 only permits development in KIBAs where they are for business, industrial, storage and waste management uses.

Question 48

Should the Havelock Terrace area be designated as Industrial Business Park?

Question 49

Are there other designations that would be more appropriate for the Havelock Terrace area?

6 Schrodgers Real Estate

7 Safestore

Question 50

Should any other parts of the SIL be redesignated as Industrial Business Park?

Question 51

Should the Local Plan allow residential uses in any part of the SIL?

Question 52

Are there opportunities for further consolidation of industrial and other uses in the SIL? If so, how can this be realistically achieved and how would it contribute to intensification of employment uses, improvements to access and upgrading the quality of the public realm in and around the SIL?

Question 53

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

8.7.2 Locally Significant Industrial Areas

8.89 The London Plan categorises Wandsworth as a restricted transfer borough for the transfer of industrial land to other uses. The Employment Land and Premises Study has identified an on-going demand for industrial land (discussed in section E12 above) and there has been a significant quantity of industrial land in the borough that has been transferred to other uses, exceeding the benchmark rate set out in the London Plan Land for Industry and Transport SPG. The SPG states that boroughs in this category are encouraged to adopt a more restrictive approach to the transfer of industrial sites to other uses and set appropriate evidence based criteria to manage smaller non-designated sites. The existing Local Plan policy (DMI1) only allows development in LSIAs to provide industrial and distribution uses (B1(c), B2 and B8 use classes), except for small scale uses which cater to the local needs of people working in these areas.

8.90 Existing Local Plan policy (DMI1) requires any redevelopment of existing B1(c), B2 and B8 floorspace to provide full replacement provision.

8.91 In Locally Significant Industrial Areas:

Question 54

Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within Locally Significant Industrial Areas?

Question 55

Should the Local Plan continue to only allow development that falls within the use classes B1(c), B2 and B8 in Locally Significant Industrial Areas?

8.7.3 New Covent Garden Market (NCGM)

8.92 The London Plan (Policy 4.4 and paragraph 4.24) recognizes that wholesale markets will continue to play an important role in London and sets out the Mayor's objective to retain an efficient wholesale market function to meet London's requirements. Paragraph 4.24 of the London Plan recognises that to do so may involve consolidation. Planning permission⁽⁸⁾ has been granted for a consolidation of the activities of New Covent Garden Market; this scheme involves significant consolidation of NCGM, with a reduction in the overall land coverage of the market but no reduction in the number of tenants and jobs supported by the market itself. The redeveloped NCGM site will make provision for aspects of food preparation as well as publicly accessible areas at the 'Garden Heart' building, which will also help to raise the profile of market businesses and make the market a more significant and prominent part of the local area. This will be closely linked with the cluster of restaurants and other commercial premises that will be located in the redeveloped apex site (at the north east end of the existing main market area) near to the future Nine Elms tube station. Works have recently commenced on site. The forthcoming London Plan review will include a review of the role of wholesale markets.

8 Ref 2014/2810

Question 56

Should the Local Plan continue to protect the function of New Covent Garden Market (following the implementation of the consolidation project recently granted planning permission)?

8.8 EI8 –Redundancy of employment premises

8.93 The Employment Land and Premises Study recommends that existing employment premises should be retained in order to help meet the on-going demand for industrial, office and other employment floorspace. Paragraph 22 of the NPPF 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.

8.8.1 Employment Uses Redundancy Criteria

8.94 The existing Local Plan sets out criteria for identifying redundancy of offices in town centres and employment floorspace throughout the Thames Policy Area and therefore allowing them to change to other uses. The existing criteria are:

- Marketing of the premises for 18 months;
- Exploring opportunities to re-let the premises, including changing the layout of the building and offering the premises as smaller or more flexible units;
- Marketing the premises at a price that is commensurate with market values;
- Demonstrating that the terms and conditions in the lease are reasonable and attractive to potential businesses, taking into account the Code for Leasing Business Premises in England and Wales 2007.

Question 57

Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?

Question 58

Should any additional criteria be included, for example demonstrating that the premises are vacant, or marketing the premises for redevelopment including an employment element?

Question 59

Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?

8.95 Note: the areas where employment uses should be protected are discussed in section EI2 above.

8.8.2 Alternative Uses

8.96 Where redundancy of employment premises has been demonstrated for premises in town centres, the adopted Local Plan currently requires ground floor uses to add to the economic vitality and viability of the town centre.

Question 60

Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?

Question 61

Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?

Question 62

Are there other places or situations in which alternative uses for redundant employment premises should be restricted?

8.9 EI9 – Waste and Wharves

8.97 Both waste development and the use of wharves are matters which have a larger-than-local significance. Waste apportionments are allocated through the London Plan, and Wandsworth is one of the Waste Planning Authorities that manage waste through the Western Riverside Waste Authority together with Lambeth, Kensington & Chelsea, Hammersmith & Fulham and the Old Oak and Park Royal Development Corporation. The waste apportionments are likely to be revised in the forthcoming review of the London Plan, as is the safeguarding of wharves, and it is therefore considered appropriate to review the Local Plan approach to waste and wharves as part of the forthcoming full Local Plan review rather than this partial review.

8.98 It is not intended in the current review to reconsider the existing approach to the management and provision of waste sites and the safeguarding of wharves. The existing policy approach for managing these uses is set out in policies DMI3 (which includes wharves) and DMI5, DMI6 and DMI7 (which cover waste). The strategic approach for waste is set out in policy PL7 of the Core Strategy. Site allocations for waste are set out in the SSAD. The strategic approach for wharves is set out in Core Strategy policy PL9 (which is not currently under review).

8.99 Instead of a comprehensive review of the waste and wharves policies, it is proposed that the text of policies DMI5, DMI6, DMI7 and the relevant parts of policies PL7 and DMI3 are transferred over to the Employment and Industry Local Plan Document with minimal changes, purely reflecting updated policy numbering but otherwise retaining the existing policy wording.

Question 63

Should policies DMI5, DMI6 and DMI7 retain the current wording and be reviewed as part of the full Local Plan review rather than this partial review?

Question 64

Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?

Question 65

Should the policy approach to wharves and the existing safeguarding allocations of the borough's wharves be retained in line with the existing policy approach, and reviewed as part of the full Local Plan review?

8.10 EI10 – Overall Approach

8.100 The policy options set out above have been informed by the Employment Land and Premises Study (AECOM, 2016), the NPPF and PPG, the London Plan and the other evidence documents listed in section 5 above, as well as engagement with key stakeholders including neighbouring boroughs and the GLA, landowners, internal colleagues, and others.

Question 66

Do the policy options set out in the sections above accurately reflect the evidence base?

Question 67

Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?

9 How to respond to the consultation

9.1 When making your representations, please be aware that this is a partial review. That means that we are not intending to review our overall Local Plan at the moment – we are just looking at our approach to employment and industrial land and premises. A full review of the Local Plan documents will follow shortly, and there will be an opportunity for you to make representations regarding all aspects of the plan including the overall spatial strategy in a later consultation anticipated for 2016.

9.2 We encourage you to respond on-line using our online consultation portal <http://wandsworth-consult.limehouse.co.uk/portal> as this greatly assists us in collating, analysing and considering the responses. Further information is also available on our website:

- www.wandsworth.gov.uk/employmentlandreview

9.3 If you are not able to respond on-line, please email planningpolicy@wandsworth.gov.uk or send written responses to:

Planning Policy
Housing & Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

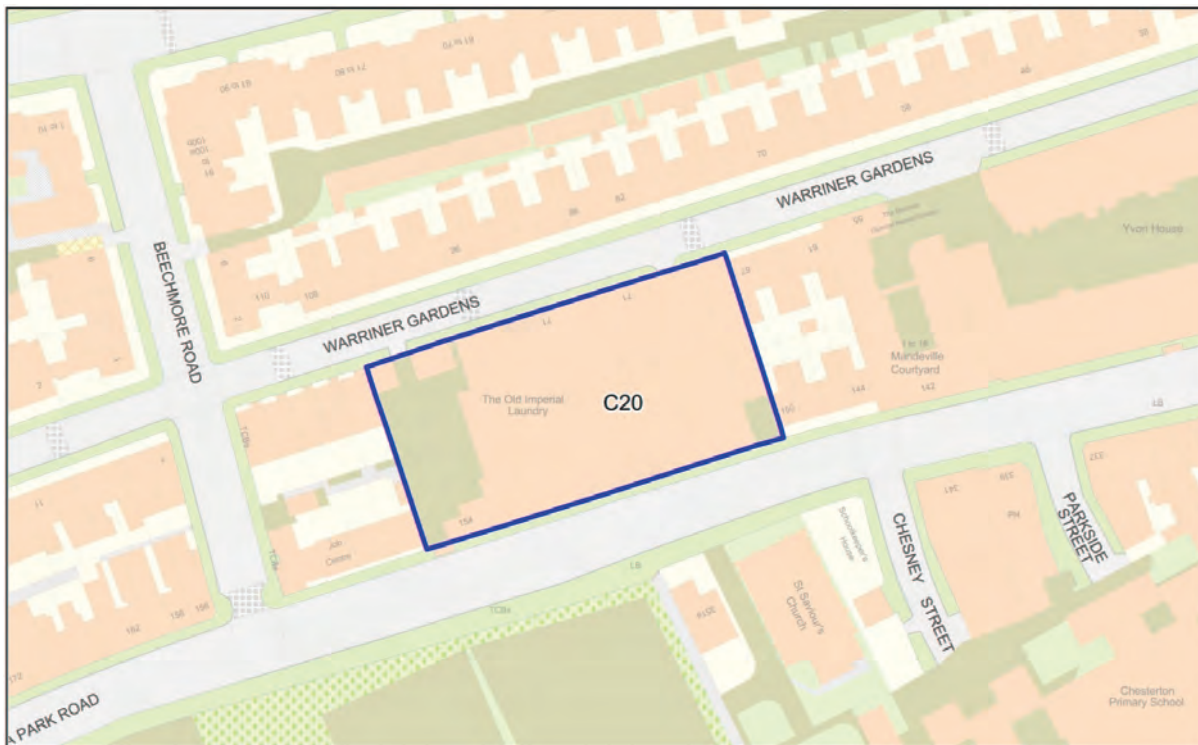
9.4 If you have any questions about the review, please phone Rob McNicol on 020 8871 8814.

10 Appendix 1 - employment area maps

Small Office and Industrial Clusters Maps

Small Office Clusters

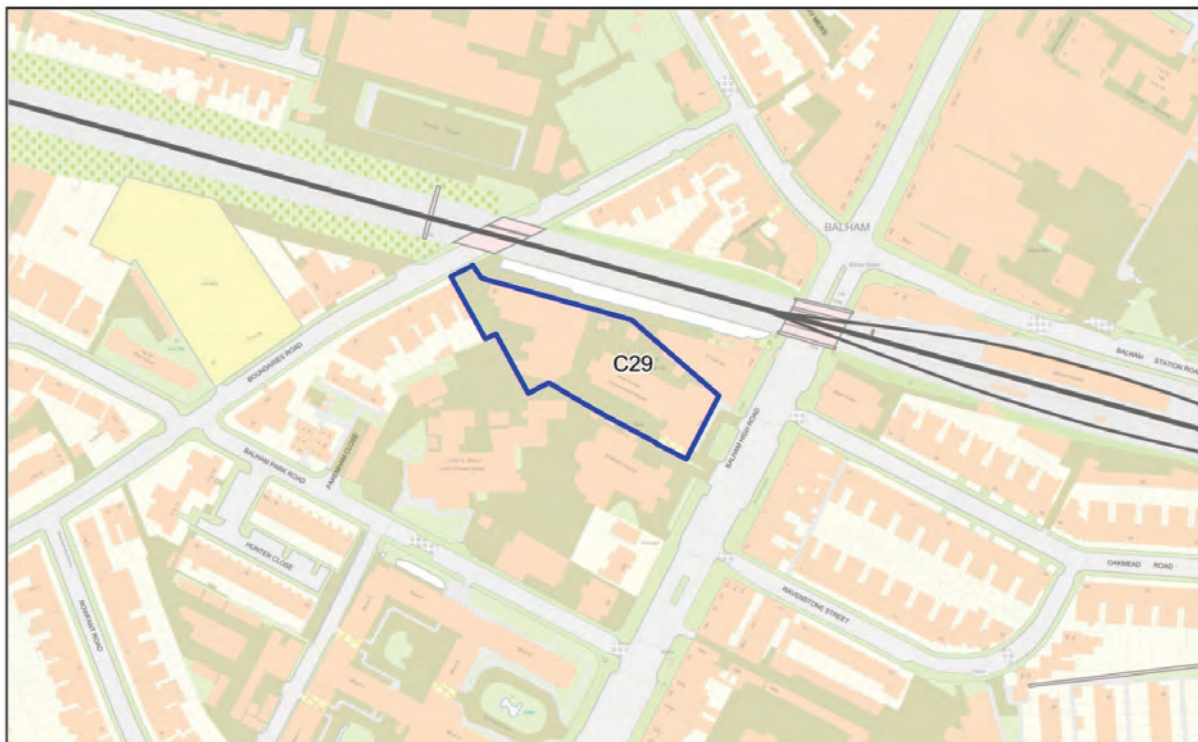
Map 10.1 C20: 71 Warriner Gardens (Old Imperial Laundry)



Map 10.2 C22: Cotswold Mews, Battersea Square



Map 10.3 C29: Irene House, 215 Balham Road, 25 Boundaries Road



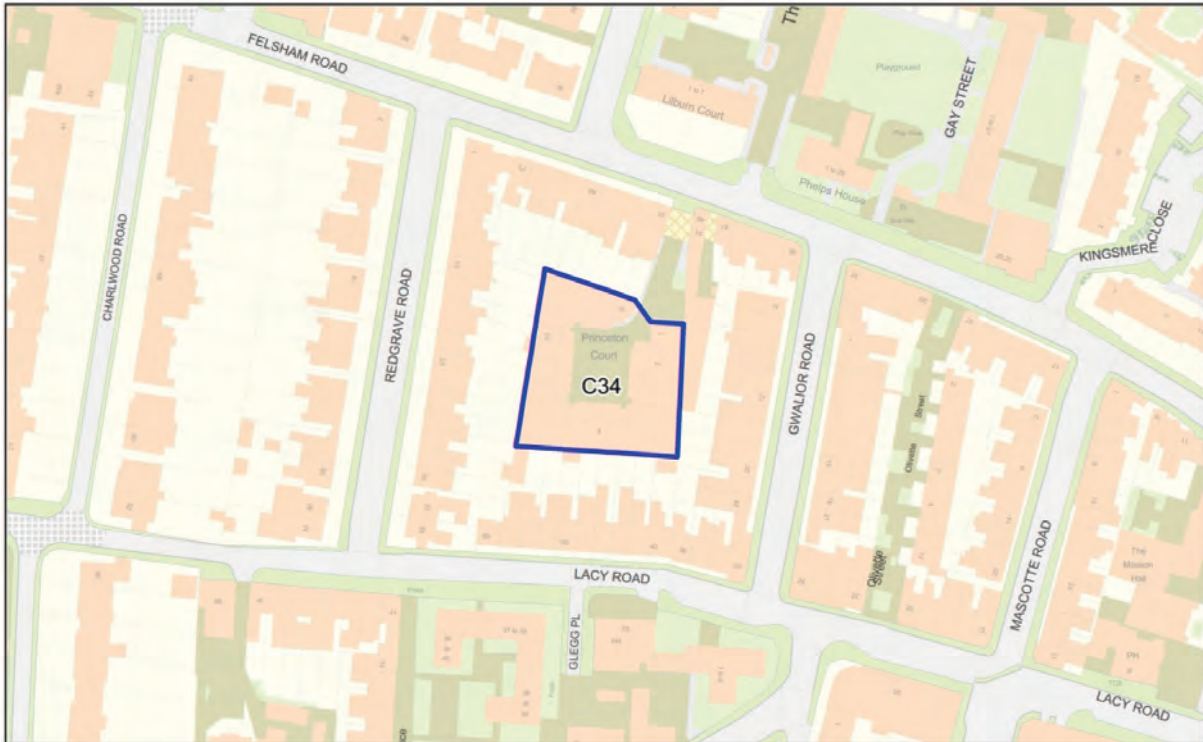
Map 10.4 C30: Cloisters Business Centre



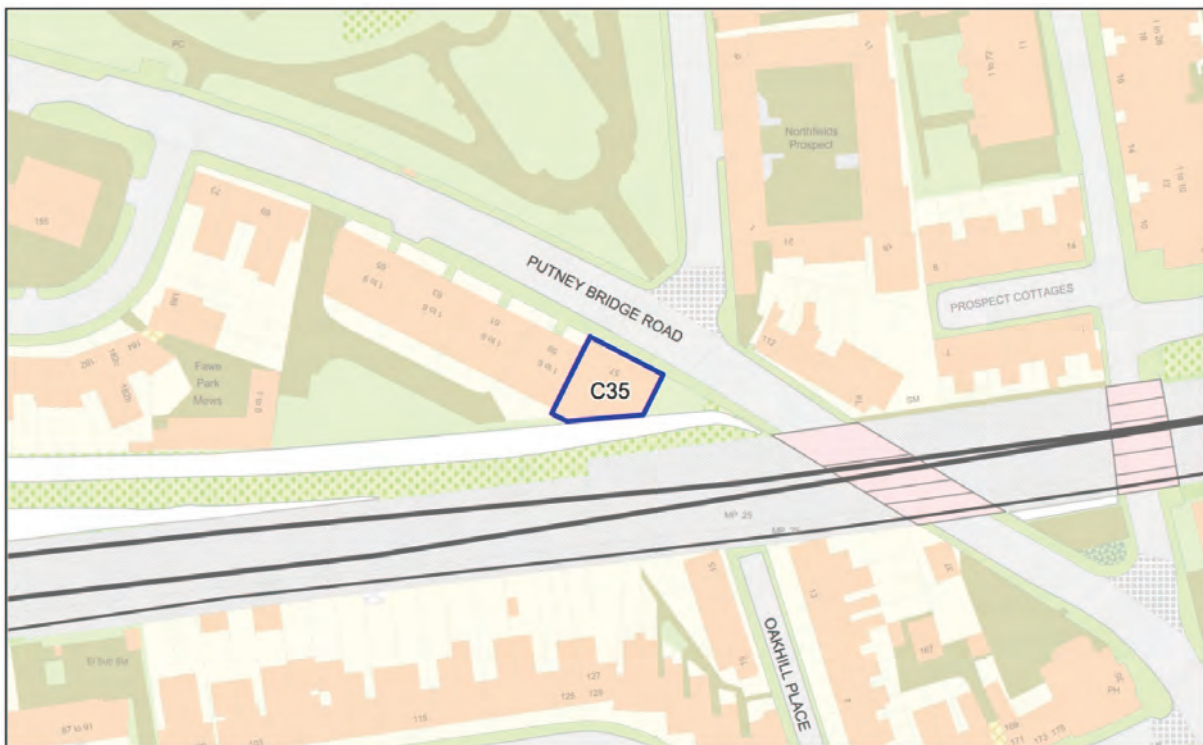
Map 10.5 C33: Hillgate Place, Balham Hill



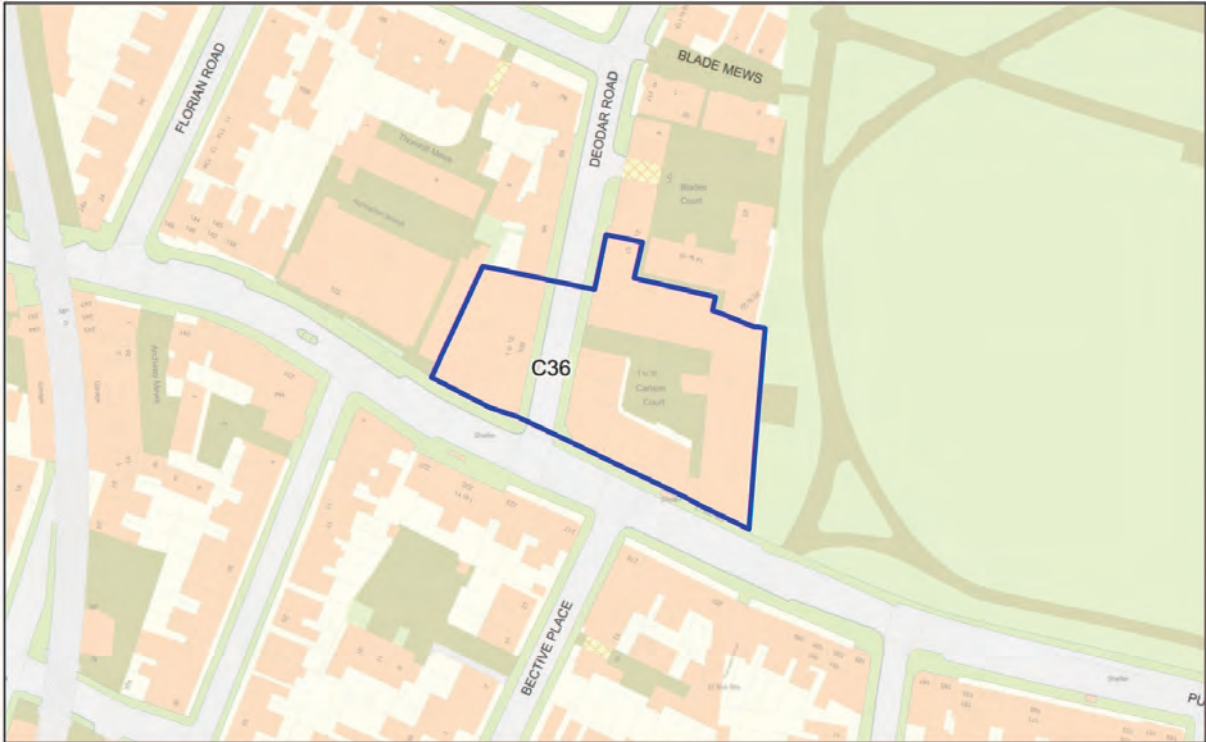
Map 10.6 C34: Princeton Court, Felsham Road, Putney



Map 10.7 C35: 57 Putney Bridge Road



Map 10.8 C36: 116 & 118 Putney Bridge Road



Map 10.9 C37: 70 Upper Richmond Road & C38: Hyde Park House, 5 Manfred Road



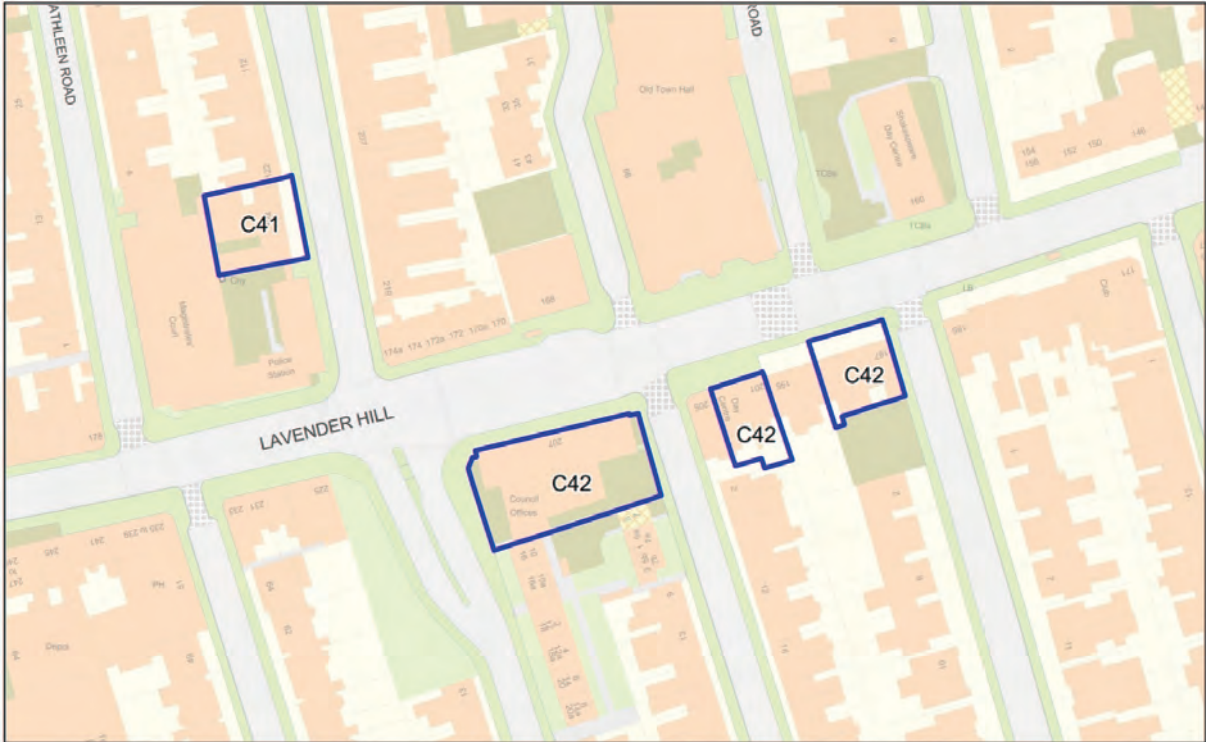
Map 10.10 C39: Triangle House, 2 Broomhill Road



Map 10.11 C40: Smiths Yard, Earlsfield

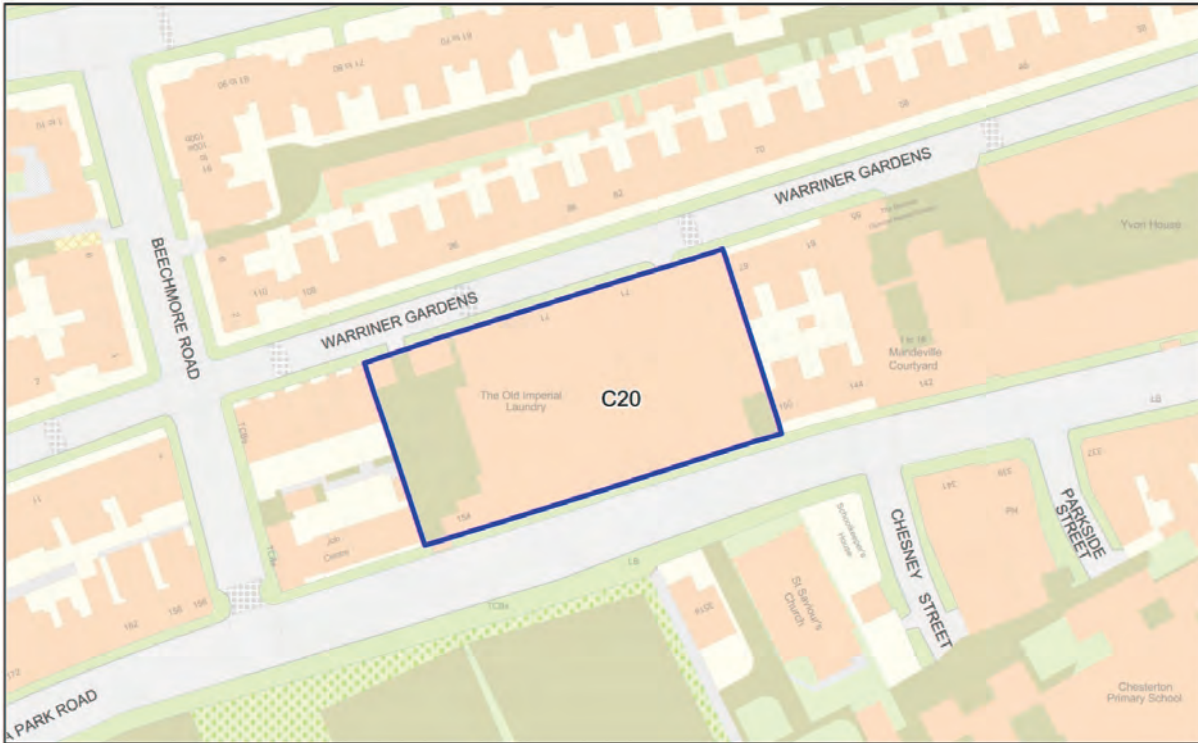


Map 10.12 C41: 124 Latchmere Road & C42: 187 - 207 Lavender Hill

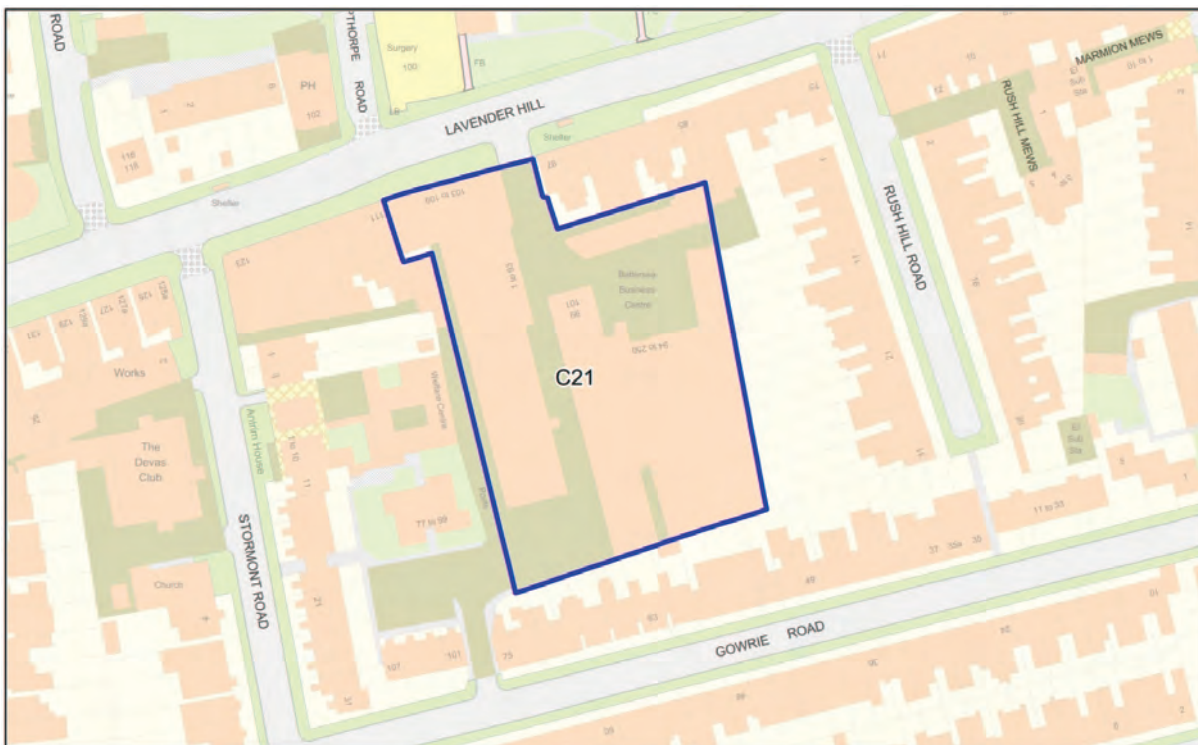


Small Industrial Clusters

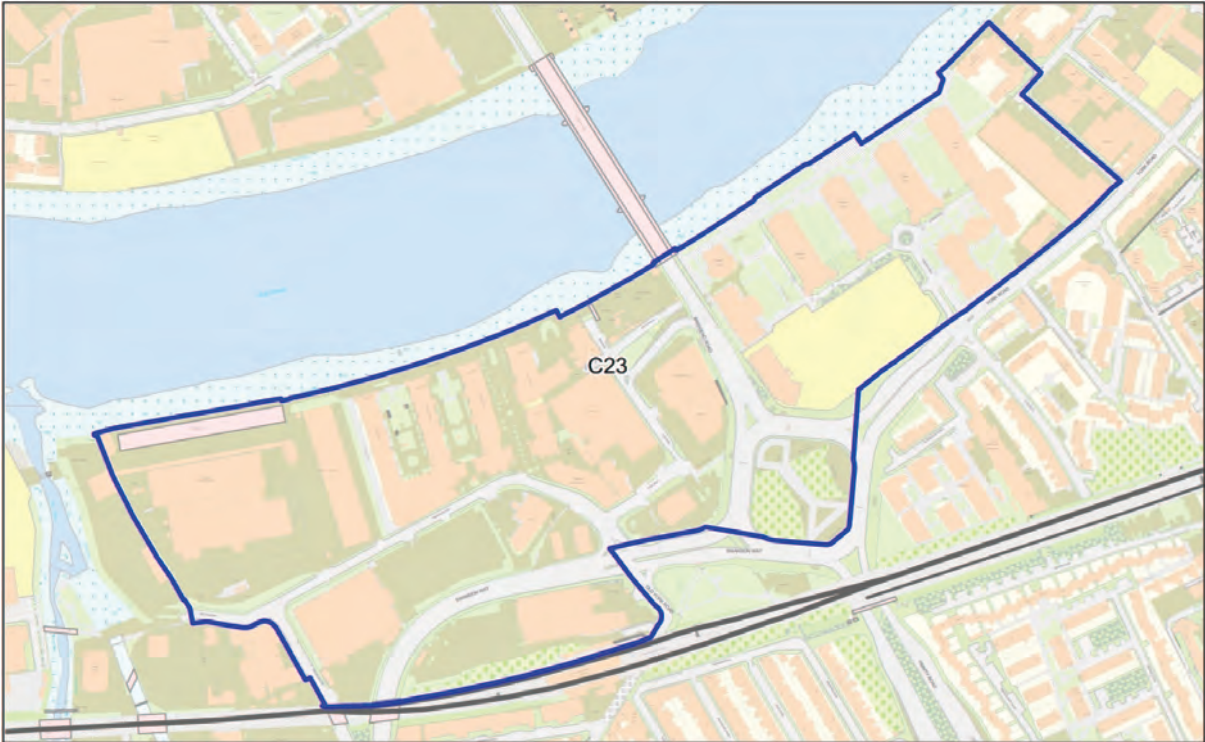
Map 10.13 C20: 71 Warriner Gardens (Old Imperial Laundry)



Map 10.14 C21: 99-109 Lavender Hill Road (Battersea Business Centre)



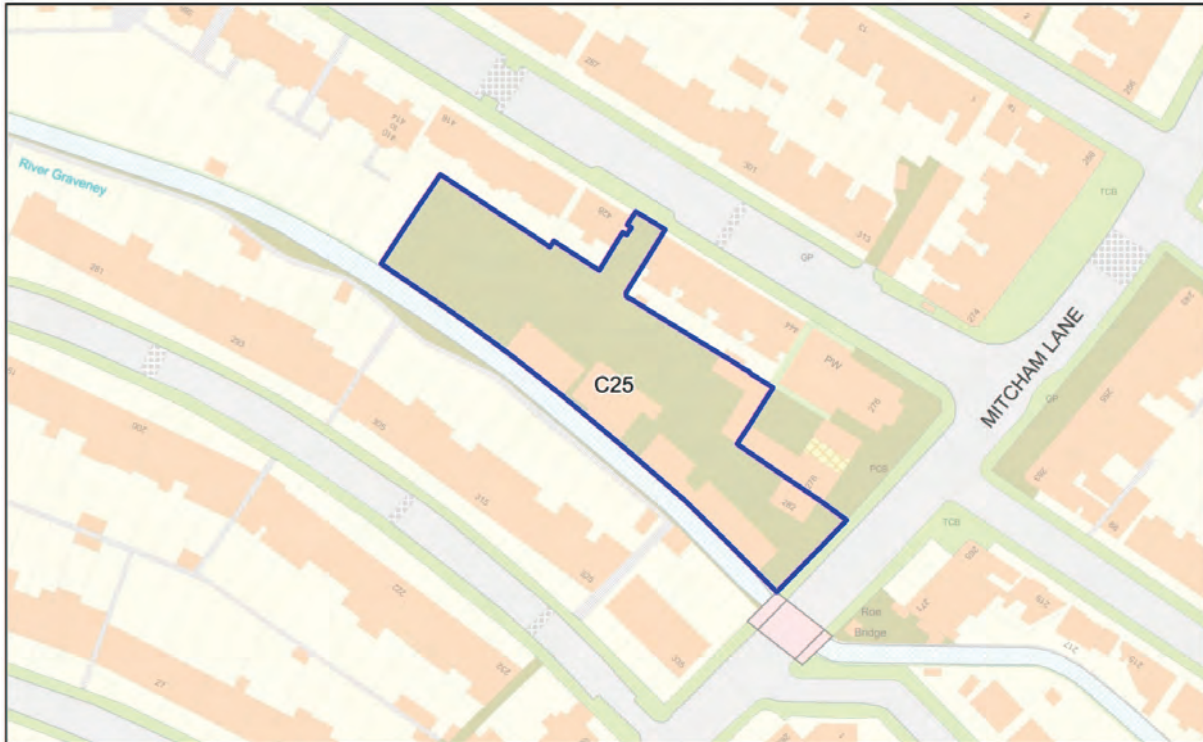
Map 10.15 C23: Smugglers Way, Mark Road, Jews Road



Map 10.16 C24: Jaggard Way



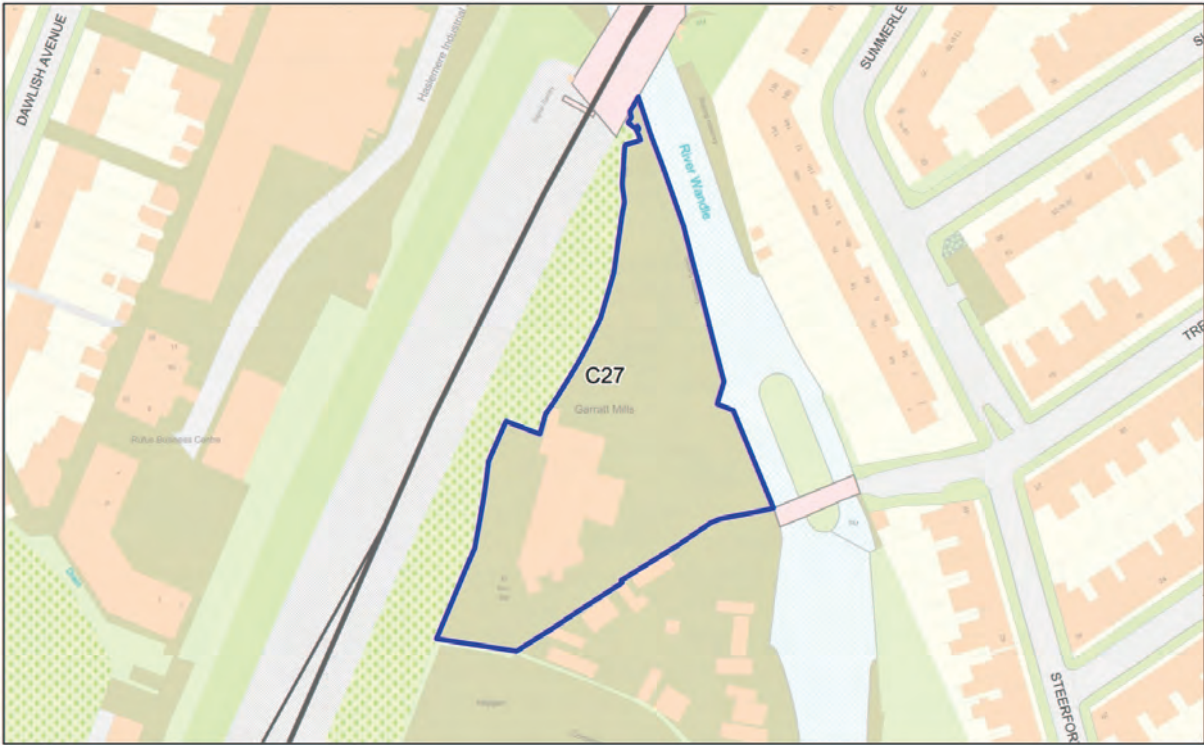
Map 10.17 C25: 282 Mitcham Lane



Map 10.18 C26: Wimbledon Sewing Machine Centre, Balham Cars and Chetwode Road



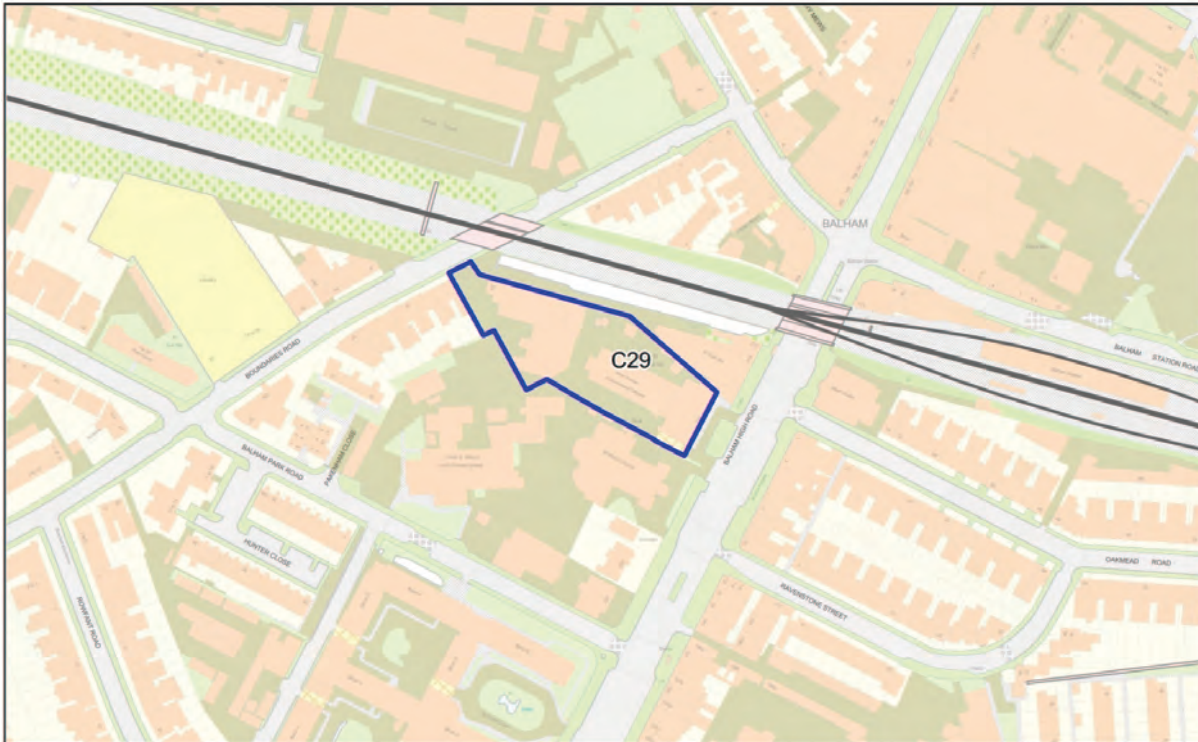
Map 10.19 C27: NJB Recycling, Trewint Street



Map 10.20 C28: Railway Arches, Winthorpe Road



Map 10.21 C29: Irene House, 215 Balham Road, 25 Boundaries Road



Map 10.22 C31: 190-194 St Anns Hill & C32: College Mews St Anns Hill



For more information write to:

Planning Policy,
Planning and Transport Division,
Environment and Community Services,
Town Hall,
Wandsworth High Street,
London SW18 2PU

Telephone: (020) 8871 6649, 6650, 7218, 7420

email: planningpolicy@wandsworth.gov.uk

or visit our web site: www.wandsworth.gov.uk/planning