

b) Chapter 8 of the document; Section 8.2 E12 – Protecting and Re-designating Industrial Land; 8.2.6 Industrial clusters and undesignated sites; C23 - OBJECTION

The Policy Document seeks to allocate the B&Q site, along with other sites as Site C23 as an “industrial, waste, transport and retail cluster” under paragraph 8.38. **We object to this.**

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

Para.8.38 confirms that the ELPS has identified a range of clusters over 0.25hectres in size that include a “significant quantity of industrial floorspace’. In addition to this the Council has undertaken survey work to identify smaller employment sites in the borough. **We object to this analysis and description as being incorrect and misleading.**

Cluster C23 Smugglers Way, Marl Road and Jews Row extends to one of the largest clusters within the policy document.

Para.8.40 states that:-

Generally the sites providing employment floorspace for SME’s, with a variety of industrial and distribution uses. Some sites also include an element of office or retail provision.

This analysis for site C23 is misleading and incorrect. **We object to this analysis and description as being incorrect and misleading.**

Para.8.40 goes onto state that:-

These sites generally tend to have lower public transport accessibility levels than the 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 albeit in some instances the proximity to establish a residential use it may cause conflicts.

It is unclear if the supporting text is referring to “railway arch sites” or those sites in Paragraph 3.38. If the text does refer to railway sites, then this needs clarifying.

If the text is referring to all sites identified in 8.38 then **we object**. Our client's site does not have a lower public transport accessibility (it is PTAL 4-5) and is well connected.

Question 13 – Should the clusters and sites identified above be protected for industrial and distribution uses? No, and we object to the inclusion of C23.

We believe that the C23 boundary allocation, and description of land uses is incorrect; misinformed and is fundamentally flawed. There is no justification to the boundary, why the development areas within it have been identified and what the end policy objective for this area is. The supporting text states that these clusters include a “significant quantum of industrial floorspace”. This is simply not the case.

C23 is principally made up of residential uses both as existing and within the Local Plan SSAD. This includes Riverside West; the B&Q site allocation; the Homesbase proposal; the Mercedes Dealership; and all of the Berkley Homes Battersea Reach development.



The current draft policy document is unsound as it fails to recognise this primary land use. In addition to this are major retail uses and a hotel. There are sui generis uses at the Waste Transfer station and Bus Garage. There is no significant industrial floorspace within this area. This area is not an industrial cluster, and to suggest it is is misleading.

This lack of clarity stems from the evidential document, Employment Land and Premises Study 2016. Paragraph 4.3.9 states that the area comprises medium and large industrial and warehouse premises, a bus depo, retail and trade premises and a large waste transfer and household waste recycling centre. It does not refer to residential uses as being a primary land use only referencing these as “some residential dwellings”.

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This is clearly an inappropriate analysis of the area specifically when one considers the adopted Wandsworth Local Plan which allocates the majority of land uses here for residential led mixed use purposes. Further the Employment Land and Premises Study in its analysis is flawed as it categorises the area as a cluster not occupied by predominantly none B Class uses. This is an inaccuracy that requires addressing.

Any protection for industrial and distribution uses will be contrary to National Planning Policy Guidance, the London Plan and Wandsworth's own adopted core strategy. It would be an unsound approach.

We welcome confirmation of receipt of these representations and look forward to receiving any further notification of consultation in due course.

Kind regards,

Yours sincerely,



Ben Ford
Director

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

Robert Deanwood
Consultant Town Planner

Tel: 01926 439078
n.grid@amecfw.com

Sent by email to:
planningpolicy@wandsworth.gov.uk

4 November 2016

Dear Sir / Madam

**Wandsworth LBC: Local Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]
Robert Deanwood
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074





GERALDEVE

Planning Policy
Environment & Community Services
London Borough of Wandsworth
Town Hall
Wandsworth High Street
London
SW18 2PU

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

FAO: Rob McNicol

4 November 2016

Our ref: NTH/KWEW/AKG/J7696

Your ref:

Dear Sirs

**61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY
Wandsworth Local Plan Employment and Industry Review
Policy Options Document (October, 2016)**

We write on behalf of our client, Panorama Antennas Limited (PAL), to submit responses to the recently published Policy Options Document October 2016, which is available for consultation until 4 November 2016 in relation to PAL's site at 61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY.

This letter of response follows both the submission of a letter of representation prepared by Gerald Eve LLP, dated 22 January 2016 (submitted as part of the initial call for sites pursuant to the Employment Land Study) and a meeting with London Borough of Wandsworth (LBW) planning policy officers Rob McNicol and Adam Hutchings, held on 28 July 2016, to discuss the policy-making process and potential development proposals for the site.

The focus of the discussions held on the 28 July was the principle of bringing forward a development scheme at the site for the re-provision and intensification of employment use, plus the incorporation of an element of C3 residential. Following that meeting, PAL and the team have developed ideas and options for the site further, and an employment-led development option is being progressed at this stage.

The Policy Options Document acknowledges (paragraph 8.28) that the Panorama Antennas site may need significant investment in forthcoming years. PAL are committed to improving and enhancing their business operations at this site and propose to undertake a significant investment to upgrade their facilities, improve the space, intensify the employment use (through introduction of additional business/industrial uses – including flexible workspace) and, potentially, explore the introduction of some additional uses including commercial and residential. The planning benefits associated with PALs proposals would be to deliver a high quality scheme design, increase employment, improve the streetscene in the site's immediately surrounding area by opening up the site through design, and, potentially, contribute to meeting borough housing targets.

The summary thrust of our representations set out in this letter are that:

- a) The Panorama Antennas site should remain a focus (and protected) for appropriate business, industrial and employment uses;
- b) Intensification of such uses at this site (and elsewhere in LSIAs) should be supported and encouraged through policy; and
- c) Relevant policy should incorporate an element of flexibility so that, additional non B-class uses should not *automatically* be unacceptable in policy terms if they can be demonstrated as compatible with site-specific proposals, existing uses and other relevant Development Plan policies.

It is within this context that we set out below our responses to the relevant questions contained within the LBW's recently published Policy Options Document (October, 2016).

Our preferred approach is to suggest an alternative wording to existing Development Management Policy DMI 1: 'Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs)', to build in the suggested flexibility mentioned above, so as to enable certain sites, such as PAL's to deliver an upgrade to their facilities, improve the space, intensify the employment use (through introduction of additional business/industrial uses – including flexible workspace) and, potentially, explore the introduction of some additional uses including commercial and residential, but also retain the overall policy thrust which is that SILs and LSIAs should be the focus for existing and proposed industrial and employment development.

Should the Council decide to retain Policy DMI 1 in its current form, in order to give PAL the opportunity to propose future development at the Panorama Antennas site, we suggest draft wording for a site-specific allocation at 61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY.

Responses to Questions Posed in Policy Options Consultation Document, October 2016

Question 4 – Should the borough continue to protect industrial land, either as a Strategic Industrial Location or Locally Significant Industrial Area, covering broadly similar areas to the existing designations at Queenstown Road and along the Wandle Valley?

The council should continue to protect industrial land in areas where industrial use is established and where there continues to be an established and ongoing long term market for that business and that specific use.

Page 17 of the Policy Options Consultation document states that the 'Employment Land and Premises Study' found that the majority of land designated as SIL and LSIA should retain its current designation, although some sites could be considered for re-designation or release from industrial use. Clearly, therefore, in some circumstances it could be appropriate to introduce small elements of other land uses within SILs and LSIAs but only where the primary land use remains in industrial/employment use or where intensification of existing industrial/employment land is proposed. Such circumstances should be considered on a site-by-site basis, having regard to existing arrangements, the potential to enhance the industrial/employment use and compliance with other Development Plan policies.

On the basis of the above, we propose an amended version of Policy DMI 1 which we consider strikes the balance between retaining appropriate controls but, in specific circumstances, allows for consideration of small elements of non B-class uses. Our suggested wording (shown as track changes) is as follows:

"a. Within the SILs and LSIAs, the loss of existing B1(c), B2 and B8 floorspace will be resisted unless full replacement provision is provided. Planning permission will be granted for new B1c, B2 and B8 development subject to compliance with Policy DMS1. In accordance with Core Strategy Policy PL7, SILs are also appropriate locations for waste management activity.

b. Proposals for B1(a) and B1(b) uses in SILs and LSIAs will only be permitted where it is ancillary to the principal use on-site, apart from where permitted by DMI1d.

c. Small scale uses which cater to the local needs of people working in the area may be appropriate within SILs and LSIAs. Within LSIAs only, limited elements of non-employment uses may be acceptable, as part of proposals involving net additional B1/B2/B8 uses if it can be demonstrated that these uses would not detract from the principal employment use of the site in question, would be compatible with the additional B1/B2/B8 use and would comply with Development Plan policies in all other respects. ~~With the exception of the provision of small scale uses which cater to the local needs of people working in the area which may be appropriate other use classes are considered unacceptable in these areas.~~

d. The western boundary of the Stewarts Road Industrial area (which is within the Queenstown Road SIL) is identified on the Nine Elms Spatial Strategy Diagram in the SSAD and on the Policies Map as an area appropriate for Industrial Business Park uses. In accordance with the Mayor's Land for Industry and Transport SPG, appropriate uses in this location are B1(b), B1(c) and high value added B2 activities. Where B1(a) office development is proposed, this should be ancillary, and ensure the industrial character of the areas is retained."

It is considered that the amended wording for Policy DMI 1 above would allow for sites, such as PAL's, to be bought forward for redevelopment for employment-led use, such as small flexible workspace, whilst also providing flexibility to incorporate non-employment uses at sites, including commercial and residential, which would support the delivery of employment-led schemes.

Question 7 – Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

Although both the former bingo hall in Bendon Valley and the Wandsworth gas holder site are being assessed for re-designation, these sites should not necessarily be prioritised. Other sites, such as PAL's site, have the potential to be bought forward faster, given their size and context and would make an equally important contribution to the borough. PAL's site should not be considered as less of a priority than other sites within the borough.

Further, there is recognition under Paragraph 8.28 of the Policy Options Consultation document that our client's site is likely to require significant investment in the forthcoming years and this, too, is an important consideration in respect of prospect for delivery.

PAL has appointed Harrison Architects + Designers Ltd to act on their behalf and undertake design feasibility work for the site's redevelopment, having acknowledged the need to improve and enhance their facilities. Significant progress has been made in this respect and early iterations of proposals were shared with officers at the meeting in July 2016.

Therefore, it is considered that the revised Local Plan should retain appropriately designated sites, which are designated for employment-led use, whilst also building in the flexibility within planning

policy to enable those development schemes to deliver supporting non-employment uses, such as commercial and residential, where appropriate.

Question 8 – Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?

In addition to the former bingo hall in Bendon Valley and the Wandsworth gas holder site which have both already been identified for potential re-designation, PAL's site ought to also have the opportunity to deliver an employment led scheme, but potentially with a small element of non-employment use too. This need not be through re-designation (and, in any event, the primary use in any redevelopment proposal at PAL would remain industrial/employment), but could be achieved through the suggested amendments to the wording of Policy DMI 1 above. Alternatively, a site-specific allocation could be brought forward (see later in this letter).

It is important to acknowledge the context of the PAL site and its surroundings. This part of the LSIA has changed significantly in recent years and is now far more mixed in terms of land use than being solely for industrial/employment use. Significant areas of land have been developed for mixed-use schemes, including residential. Paragraph 8.30 of the Policy Options Consultation document recognises that the Central Wandsworth LSIA is within an 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. In this context, PAL's site should be afforded the opportunity to promote employment-led redevelopment and, if appropriate, some non-employment uses.

Therefore, it is considered that given the significantly changing context of the Central Wandsworth LSIA, the Local Plan should seek to allow for sites within areas where the character of the surrounding environment is undergoing significant change, to remain designated (or be re-designated) for employment-led uses which includes small, flexible workspace units, whilst also building in the flexibility in policy for those development schemes to deliver supporting non-employment uses, such as residential, where appropriate.

Question 32 - Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?

Should the council decide to retain Policy DMI1 in its current form, we propose that a new site-specific allocation for the Panorama Antennas site should be included in the revised Local Plan.

As was presented both in our previous letter of representation and at the meeting held with LBW in July 2016, the Panorama Antennas site is appropriate for additional/intensified industrial/employment use, with the potential for a small amount of non-employment use. Panorama Antennas would like to deliver an enhanced employment use at this site, to provide fit-for-purpose, rationalised employment space and deliver affordable workspace to meet the demand identified in the 'Employment Land and Premises Study'. In order to achieve this, a small element of residential accommodation at the site is currently proposed.

Accordingly, below we have provided a Draft Site Allocation Wording for 61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY.

“Site Allocation Panorama Antennas, 61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY

Proposals for improved and enhanced employment space at this site will be supported, in principle, by the Council. An appropriate design for the reconfiguration of the existing employment floorspace to provide the most efficient use of that land will be sought. The provision of affordable workspace will be encouraged. As part of comprehensive redevelopment proposals, small-scale non-employment uses may also be acceptable (such as retail, commercial and/or residential) subject to demonstration that such uses would not detract from the principal employment use of the site, would be compatible with the overall redevelopment proposal and would comply with Development Plan policies in all other respects.

It is considered that the suggested site allocation wording above would allow for the appropriate redevelopment of our clients’ land for employment-led uses, including small, flexible workspace, whilst also providing the flexibility within policy to incorporate an element of supporting non-employment uses.

Question 54 – Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 in Locally Significant Industrial Areas?

The suggestion that the Local Plan should continue to require full replacement provision of existing B1(c), B2 and B8 in Locally Significant Industrial Areas is supported in principle in order to maintain the character and function of the LSIAs. As described above, where proposals involve net additional employment use as part of redevelopment, there should be scope to consider incorporation of a small element of non-employment uses, subject to compliance with various criteria as detailed previously.

It is considered that allowing for additional non-employment uses within employment-led redevelopment schemes could enable a greater number of sites will be bought forward to meet the LBW’s targets.

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?

As with the responses previously set out in answer to Questions 4 and 54, it is considered that the Local Plan should seek to allow for development for uses which fall outside use classes B1(c), B2 and B8 in Locally Significant Industrial Areas on certain sites in certain circumstances, as above.

As the document prepared by Harrison Architects + Designers Ltd submitted in support of this letter of representation demonstrates, the Panorama Antennas site is one where the opportunity exists to intensify the existing use at the site, promote a net increase in employment floorspace, but also potentially introduce a small element of non-employment use (residential). The representations in this letter seek to ensure that planning policy allows for such a (re)development scheme and that planning policy is flexible in order to enable the incorporation of non-employment uses on designated sites that are to be redeveloped for employment-led use.

Local Discussions regarding Managed Workspace

Given that the principle of providing small, flexible, SME and start-up workspace accommodation at the site has been identified as deliverable, our client has undertaken discussions with local commercial agents regarding the market demand for managed workspace in order to gauge the market’s interest in such an offering.

The outcome of that discussion has been that there is market demand for units of between 1,000-1,500 sqft and potentially for some units of half that size. The units would have the flexibility to be laterally combined and would have their own service points. Therefore, consideration is being given to the creation of a new small business centre, which Panorama Antennas would run as a business operation additional to Panorama Antennas, to provide this managed workspace.

Documentation

This letter of response is supported by an initial study and options appraisal for the site, prepared by Harrison Architects + Designers Ltd. The study demonstrates the site's redevelopment potential through the re-organisation of the underutilised existing employment floorspace at the site in order to create space for the provision of affordable workspace and/or residential accommodation, as per the draft site allocation. At this stage the study should be considered only as indicative and emerging. Two redevelopment opportunities which our client has identified at their site are:

Option 1

Option 1 demonstrates how the site could be redeveloped retaining the existing accommodation, whilst expanding the Class B1(c) use and introducing flexible employment floorspace, suitable for SME tenants. This option also demonstrates how a small amount of residential floorspace can be incorporated at the site.

This option has been the subject of the discussions with local commercial agents undertaken by PAL and was also briefly discussed at the meeting held with LBW planning officers on 27 July 2016.

Option 2

Option 2 proposes the site be reorganised to retain the existing employment floorspace accommodation, whilst also expanding the Class B1(c) use and introducing an element of housing at the site.

This option was discussed at the meeting held with LBW planning officers on 27 July 2016.

Within this option, housing is introduced at 63 Frogmore and along the Dormay Street frontage which would serve to activate the street frontages in this location. The employment floorspace would be consolidated at the centre of the site with a massing which respects the amenity of the proposed residential accommodation.

Concluding Remarks

It is considered that PAL's site presents an opportunity for development to improve and enhance their business operations and to upgrade the existing facilities, improve the space, intensify the employment use (through introduction of additional business/industrial uses – including flexible workspace) and, potentially, explore the introduction of some additional uses including commercial and residential.

These representations demonstrate how planning policy can support and enable appropriate development at PAL's site, which would result in enhanced and improved employment floorspace

provision to meet local demand. An element of flexibility, to incorporate some non-employment uses is also sought within policy.

We trust that these comments will be taken into consideration as part of the ongoing consultation process associated with the Employment Land Review and emerging Local Plan process. We would be grateful to be kept informed of this process. If you would like to discuss these responses in greater detail, please contact Kevin Watson (020 7333 6388) or Anna Gargan (020 7518 7240) of this office.

Yours faithfully



Gerald Eve LLP

kwatson@geraldeve.com
Direct tel. +44 (0)20 7333 6388

Initial study and options appraisal for 61 & 63 Frogmore on behalf of Panorama Antennas



Harrison Architects + designers Ltd were appointed in September 2015 to explore options for the site. This report presents the findings from our initial site analysis, and a look at the wider emerging environs to the client's land. Whilst no solution is finalised, a lot of planning feasibility work has been carried out with Panorama Antennas now committed to investment / refurbishment or re-development of the site as best decided in the future to achieve their aims and gain the support of LBW.

Panorama Antennas are considering alternative land uses at their site as their existing premises require improvement to support the company forward, to enable its prosperity to continue for the next generation.

Panorama Antennas has decided strategically they need to remain in Wandsworth where the skilled staff are available, but in order to do so their premises needs updating to accommodate the changing technology upon which they rely to remain competitive.

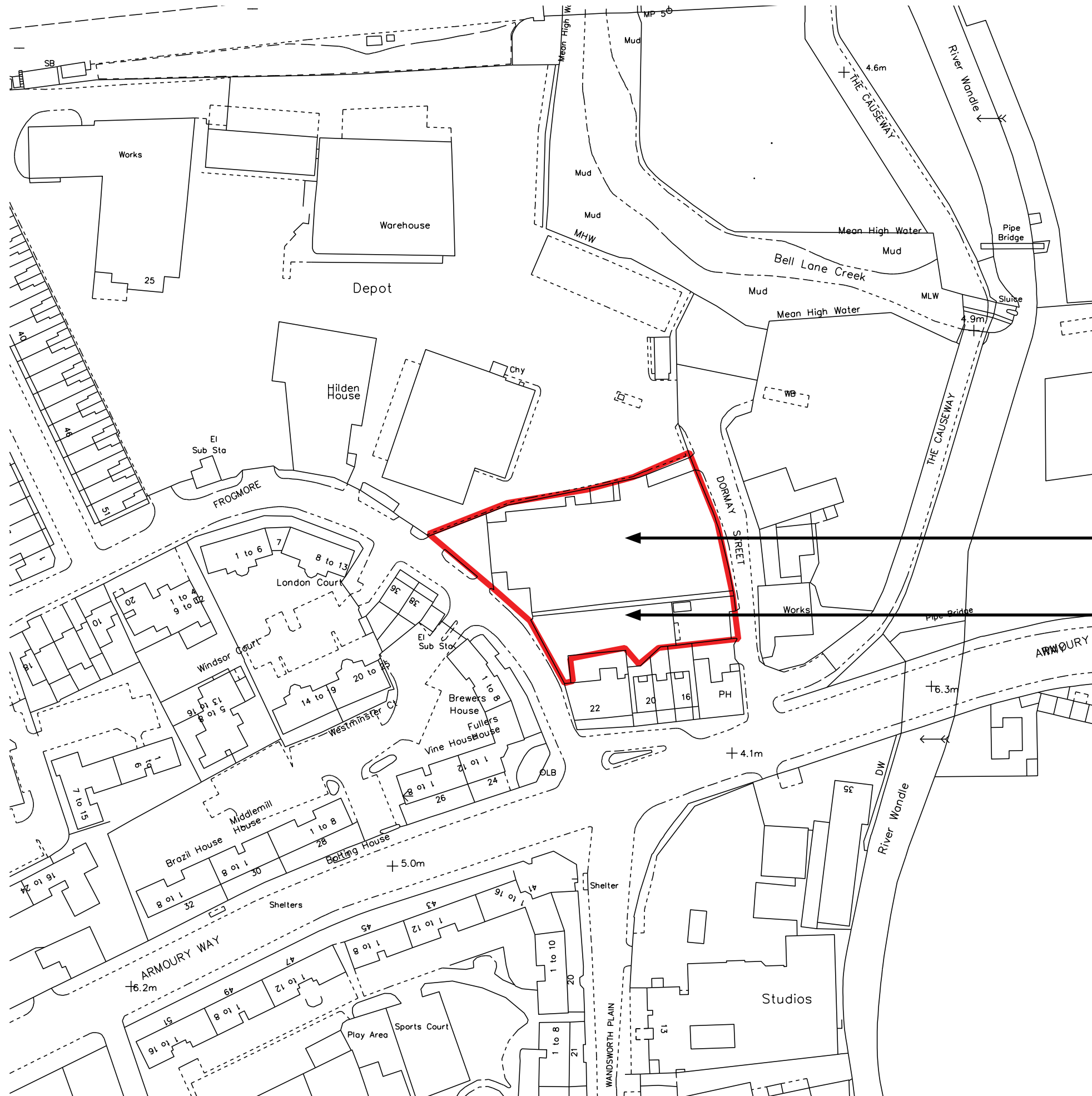
Their industry has moved away from older forms of manufacturing with a greater reliance now on R&D and specialist tooling. Their premises which were last refurbished 25 years ago as a quick and temporary set up to allow the company to continue trading following their move from Putney, now requires urgent re-working.

To do so the company needs to capitalize on the land value of the site and therefore is considering solutions including a change from B1c to a broader employment led site designation with potential to include supporting non employment floorspace. The initial study has identified a number of constraints and opportunities and the client wishes to engage in dialogue with the London Borough of Wandsworth Planning department early in the progress.

No preferred solution has yet been defined, but within Sections 6 - 7 of this report we have shown two initial ways the site could be re-organised and developed to achieve the above company goals. This would involve re-configuration of their operations, extension of existing structures, and provision of housing on site, without any employment loss. Both options expand the existing B1c areas on site, provide additional B use floorspace and provide a valuable contribution to local housing needs. A clear added benefit would be the enhancement of Dormay Street with active frontages.

This presentation is set out in the following sections:

Section 1.0	Site context
Section 2.0	Existing buildings and uses on site
Section 3.0	Wider context to the site
Section 4.0	Connecting the town centre and riverside - A vision
Section 5.0	Site history
Section 6.0	Option 1 (expanded B1c + large housing contribution)
Section 7.0	option 2 (expanded B1c + complimentary B1 space + small element of housing)



61 Frogmore, Wandsworth

63 Frogmore, Wandsworth







Photo 1 View from junction of Armoury Way looking along Frogmore.
(No 22 Armoury Way on right hand corner)



Photo 2 View along Frogmore towards Panorama Antennas
(Side boundary wall to No22 Armoury Way on right handside of image)



Photo 3 16-22 Armoury Way with Armoury Public House (Massing 2-3 storeys)



Photo 4 View along Frogmore looking East towards Panorama Antennas



Photo 5 View south east along Frogmore towards rear elevation of 22 Armoury Way



Photo 6 View into Westminster Court (Low rise housing of 3-4storeys)



Photo 7 View into Westminster Court (Low rise housing of 3-5 storeys)



Photo 4 View from gate on Frogmore into Frogmore depot



Photo 9 Junction of Dormay St and The Causeway(right hand fork), just off Armoury Way



Photo 10 Grade II Listed Wentworth House on Dormay street (Residential 2.5 storeys)



Photo 11 Office Annex to Wentworth House (2 storeys with Conservation Area)



Photo 12 Rear Elevation of Panrorama Antennas Parts storage Warehouse on Dormay St NB Closed/inactive elevation does not contribute to street scene

Section 1.0

Adjacent environment / context - Site Photos on Dormay Street



Photo 13 Dormay Street leading to Wandsworth Depot (18 storey tower by riverside beyond)



Photo 14 Larger scale massing to North beyond elevated railway line



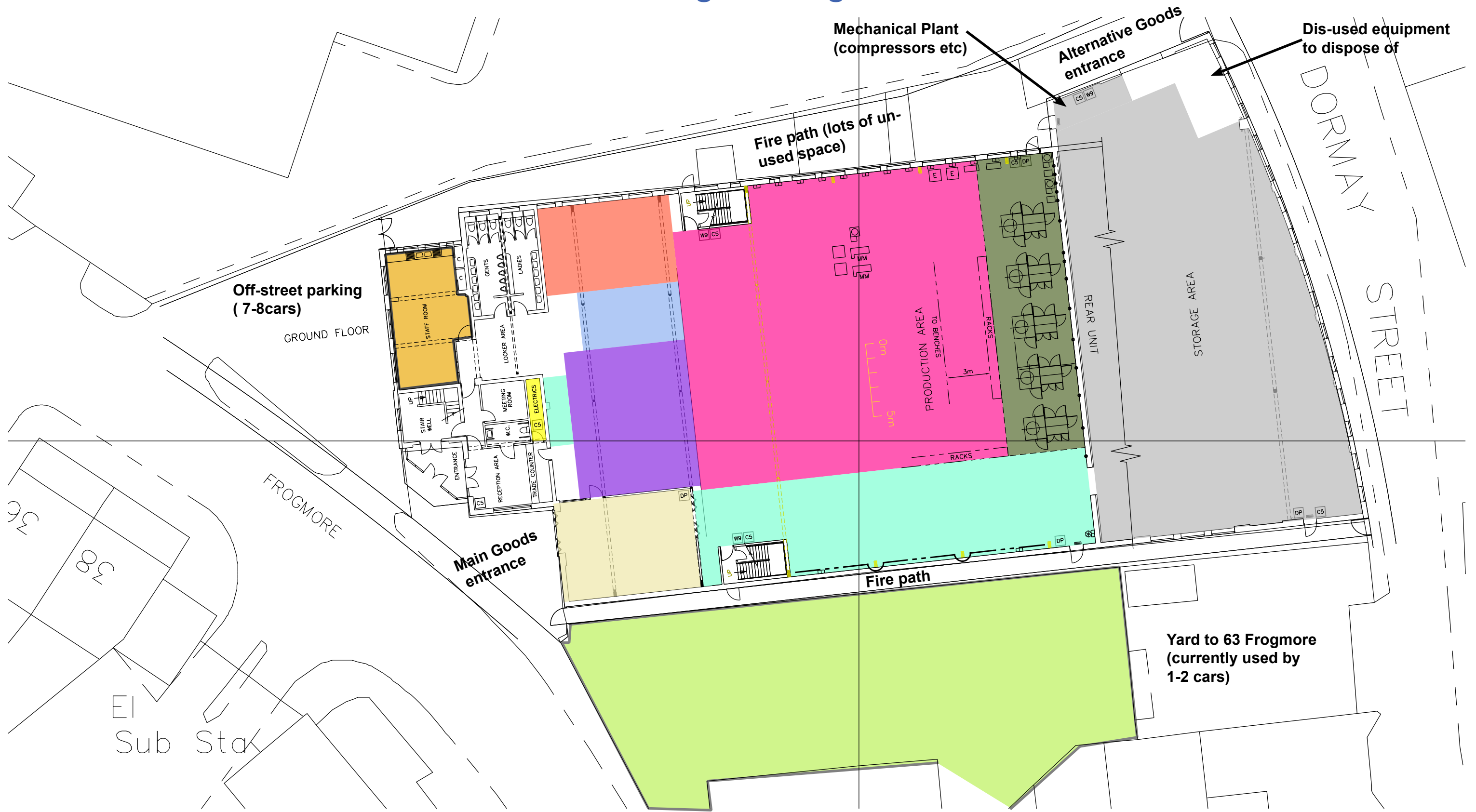
Photo 15 View south on Dormay Street of building opposite Panorama Antennas



Photo 16 Windows to rear elevations of 16-20 Armoury Way

Section 2.0

The Existing Buildings on Site and current uses - Ground Floor




Goods IN/OUT + refuse (64m²)	Goods Collection 4 tier racking (165m²)	Parts storage 2 tier racking (460m²)	Engel machine (x5) (108m²)	Production Area (420m²)	Dispatch (85m²)	Planning (30m²)	QA (8m²)	Tool room (55m²)	Staff rest Rm (45m²)	Mains Power supply (45m²)	63 Frogmore Building let to SINKSTATION (421m²)

Section 2.0


The Existing Buildings on Site and current uses - First Floor




HR + Accounts
(12m²)




Customer relations
(57m²)



Open Plan office
(combined 95m²)




Testing area)
(50m²)




Goods collection
upper part multi
tier racking
(140m²)



Unallocated Area
(95m²)



Exec Offices +
Board room
(83m²)



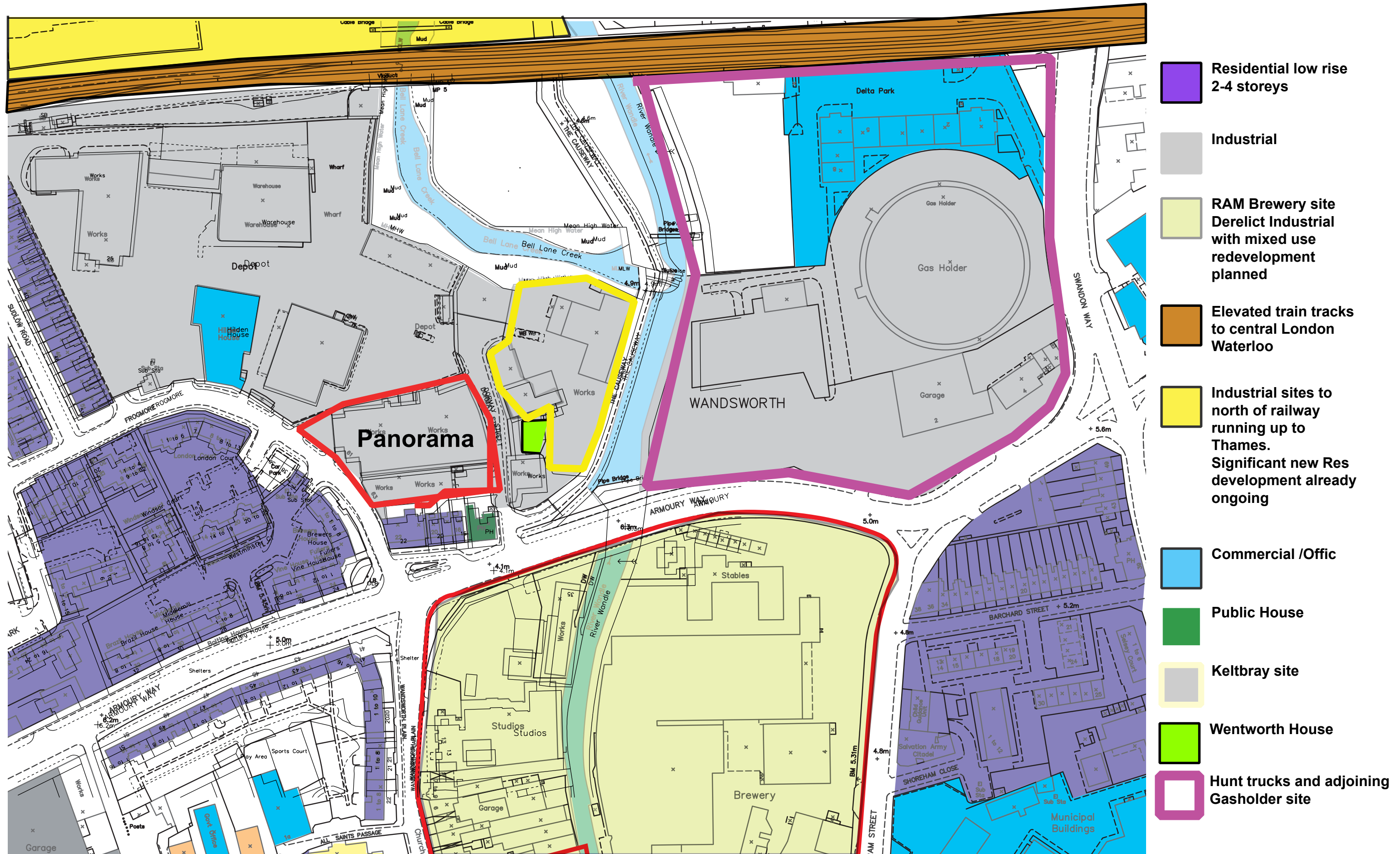
Looking at the existing operations on site the following observations and opportunities have been identified

Observations

- The company is housed in buildings refurbished as a temporary solution 25 years ago.
- Parking uses a large area of the site considering the site location in a Ptal 5 to 6a zone.
- Multiple goods entrances use lots of space
- The loading yard to 63 Frogmore is under-utilised
- 63 Frogmore backs onto locally listed public house. The setting of adjacent heritage assets needs careful consideration as part of any future redevelopment.
- The strip of land along the northern side of Panorama Antennas's buildings is un-used
- High internal roof spaces = under utilized space
- Storage areas for production activities could be reduced.
- Redundant machinery could be cleared to make more space

Opportunities

- Potential for taller elements within the centre, West and North sectors of the site identified without impacting depot to the North
- Re-configuration of internal spaces and operations could realize significant space for alternative use or expansion of the existing operations.
- 63 Frogmore could be replaced with a 2 storey structure in place of the large single storey volume.
- The multiple goods entrances could be rationalised saving internal circulation
- Technological advances mean manufacturing is less dependent on heavy machinery. The addition of extra floor or mezzanines for production and manufacturing could deliver significant additional space
- Replacement of the inactive facade along Dormay street facing Wentworth House, would greatly enhance the streetscape.



- **Panorama Antennas is located within the strip of land between the elevated railway and Armoury Way. The buildings in this area are generally 2-5 storeys but to the south and north of this area exists many higher buildings. The appropriate height for any development requires dialogue with the LBW planning department.**
- **The site backs onto Wentworth House on Dormay street (Grade II Listed)**
- **Dormay Street is dominated by the closed and predominantly solid facade of and Panorama Antennas's parts storage warehouse.**
- **Redevelopment of the eastern part of Panorama Antennas's site could enable the setting of the listed building to be greatly enhanced.**
- * **The Wandsworth Council depot to the North of Panorama Antennas site, is a large undeveloped area used for the storage, servicing and parking of vehicles. Re-development of Panoramah Antennas site with increased massing on this boundary would would have little or no impact on the depot to the north.**
- **The section of the site known as 63 Frogmore with its closer setting to the rear of the buildings on Armoury Way could in townscape terms provide a stepping stone for increased massing within the 61 Frogmore site.**
- **The existing residential areas to the South West of Frogmore (Westminster Ct, Windsor Ct, Vine House, Brewers House, Brazil House and London Court) clearly define this area as residential use, of general 4-5 storeys.**
- **The site is adjacent to the Tideway Tunnel Project which runs below Dormay Street. Understanding of the works involved and any limitations this might impose will be required when bringing forward any development proposals at the site.**

Summary

The redevelopment of the Ram brewery site, and site along the river places Panorama Antennas's site in a key location along the primary connections between the town centre and river. As such the site offers the opportunity to enhance the public realm and deliver the improvements Panorama Antennas seek. We have studied the proposals for creation of better public spaces along the River Wandle, and how these developments propose to soften the banks of the River Wandle as part of the landscaping proposals and sustainability strategy. We believe these same strategies could be employed to improve the middle section of the River Wandle between Armoury Way and the elevated railway lines. The next page shows images of the proposed public spaces within the Ram Brewery site, and by contrast the northern section of the Wandle north of Armoury Way.

Connecting the town Centre to the riverside - A vision

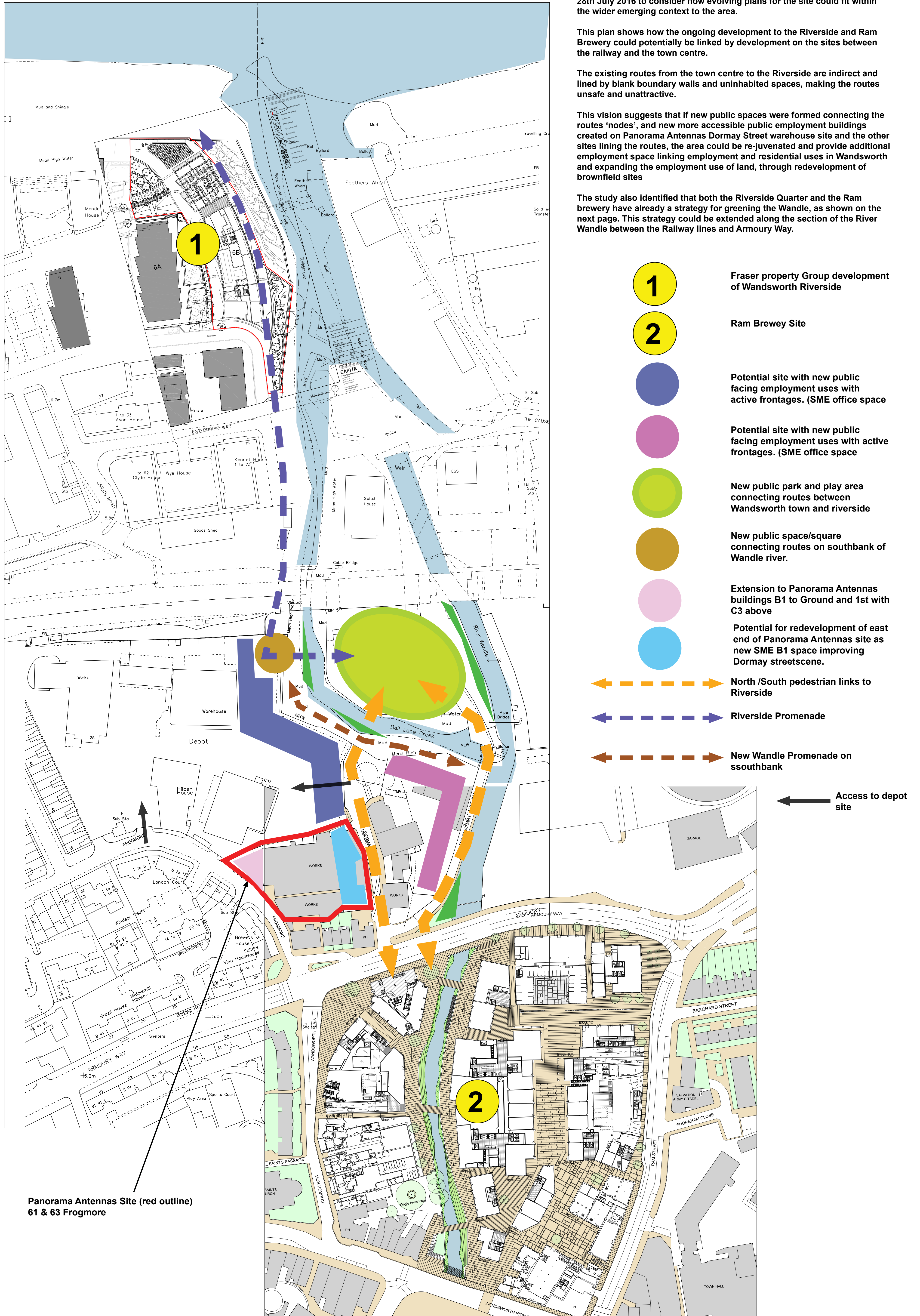
Panorama Antennas team were asked by LBW Planners at the meeting on 28th July 2016 to consider how evolving plans for the site could fit within the wider emerging context to the area.

This plan shows how the ongoing development to the Riverside and Ram Brewery could potentially be linked by development on the sites between the railway and the town centre.

The existing routes from the town centre to the Riverside are indirect and lined by blank boundary walls and uninhabited spaces, making the routes unsafe and unattractive.

This vision suggests that if new public spaces were formed connecting the routes 'nodes', and new more accessible public employment buildings created on Panorama Antennas Dormay Street warehouse site and the other sites lining the routes, the area could be re-juvenated and provide additional employment space linking employment and residential uses in Wandsworth and expanding the employment use of land, through redevelopment of brownfield sites

The study also identified that both the Riverside Quarter and the Ram brewery have already a strategy for greening the Wandle, as shown on the next page. This strategy could be extended along the section of the River Wandle between the Railway lines and Armoury Way.



IMPROVING THE RIVER WANDLE



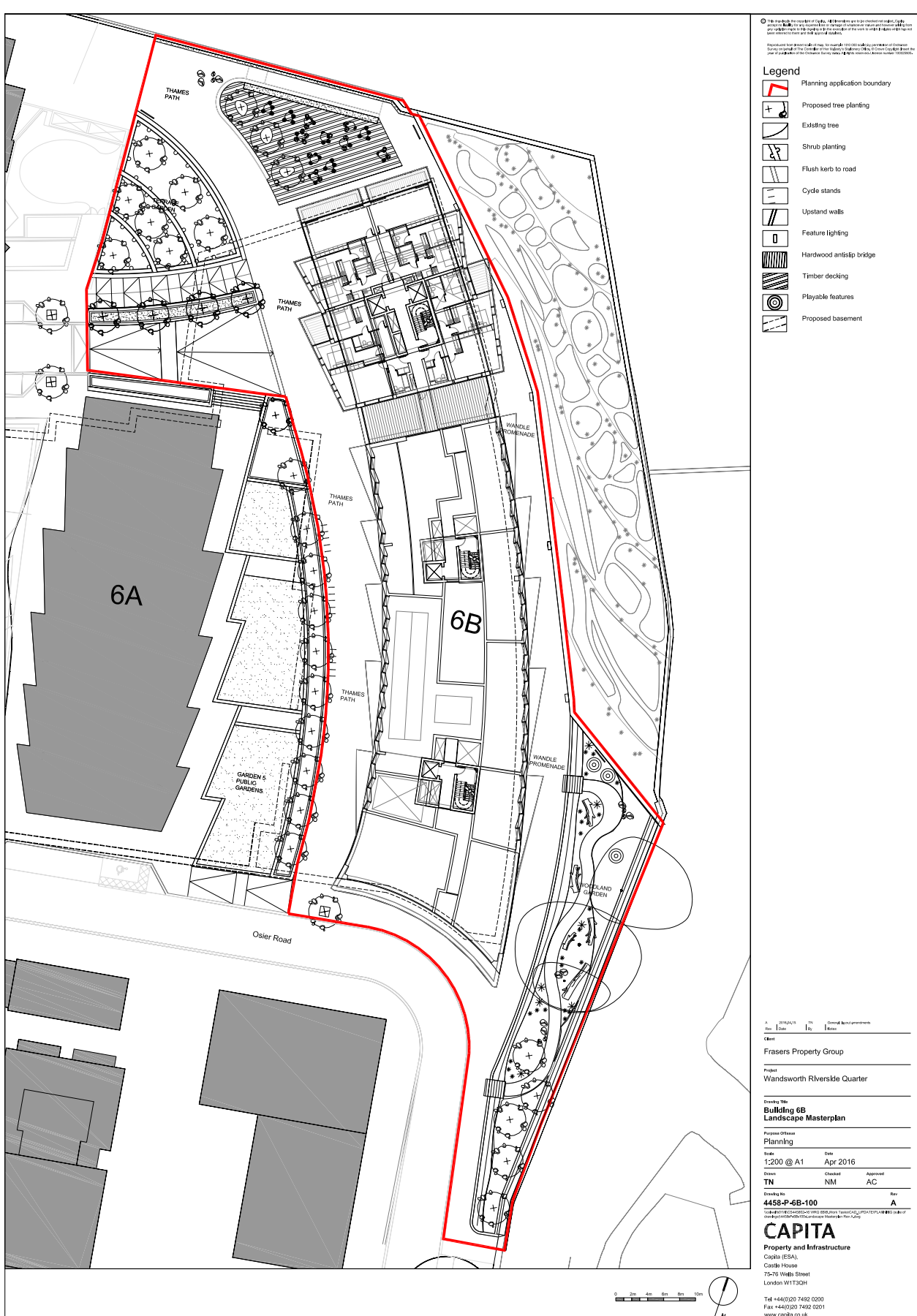
Artistic image of Ram Brewery Development showing the developers proposals for the Wandle and new



Artistic image of Ram Brewery Development showing the developers proposals for the Wandle and new



Photograph of River Wandle viewed from The Causeway looking south towards Armoury Way crossing



Plan from Riverside Quarter development showing proposed treatment of Wandle river banks and new Wandle promenade

The maps show that a terrace of buildings have existed in the place of what is now known as 16-22 Armoury Way, and the Crane public house since 1746.

Buildings lined Dormay Street as early as 1746 forming a solid terrace with a minimal gap to the rear of the Armoury Public House. Wentworth House and a cluster of buildings existed on the East side of Dormay street since 1746.

Extract from John Rocque 26" map of London, 1746

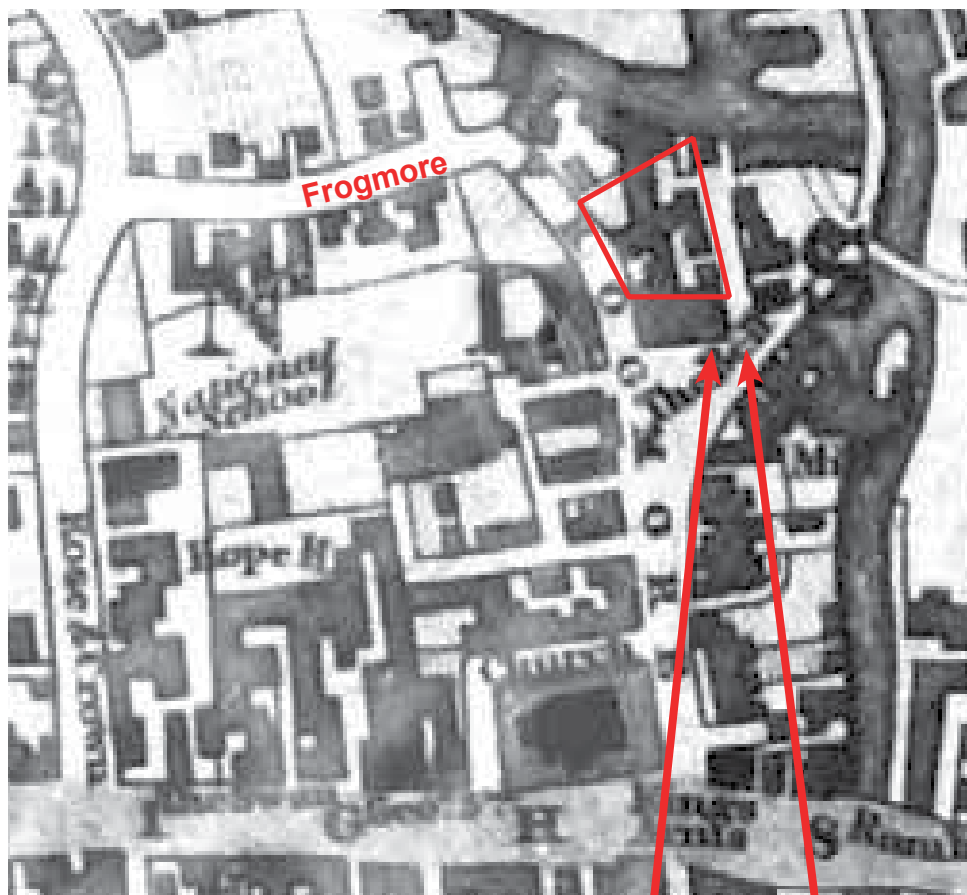


What is now
16-22 Armoury Way

The Armoury PH

Dormay St

Extract from G.F. Cruchley's New Plan of London and its Environs of 1829



The Armoury PH

Dormay St

Extract from James Wyld's 3" map of London, 1843-44



The Armoury PH

Dormay St

The progression of development post 1843 (last map on previous page), shows more detail on the ribbon of development on the west side of Dormay St (now the location of Panorama Antennas parts storage warehouse), with small terraced buildings lining the street, which historic photos obtained from the Museum of London confirm were cottages. The indent in front of Wentworth House is clearly defined, and by 1896 the open fields are becoming infilled with industrial buildings. A dye works is shown on the Panorama Antennas site on by 1896.

Extract from Ordnance Survey Map 25" edition, published in 1868



Extract from Ordnance survey 25" edition, published in 1871



Extract from Ordnance survey 25" edition, published in 1896



What appears to be housing on West side of Frogmore in the location of what is now Brewers House

Dormay St

What is now 16-22 Armoury Way

The Armoury PH

The Armoury PH

Dormay St

The Armoury PH

Dormay St

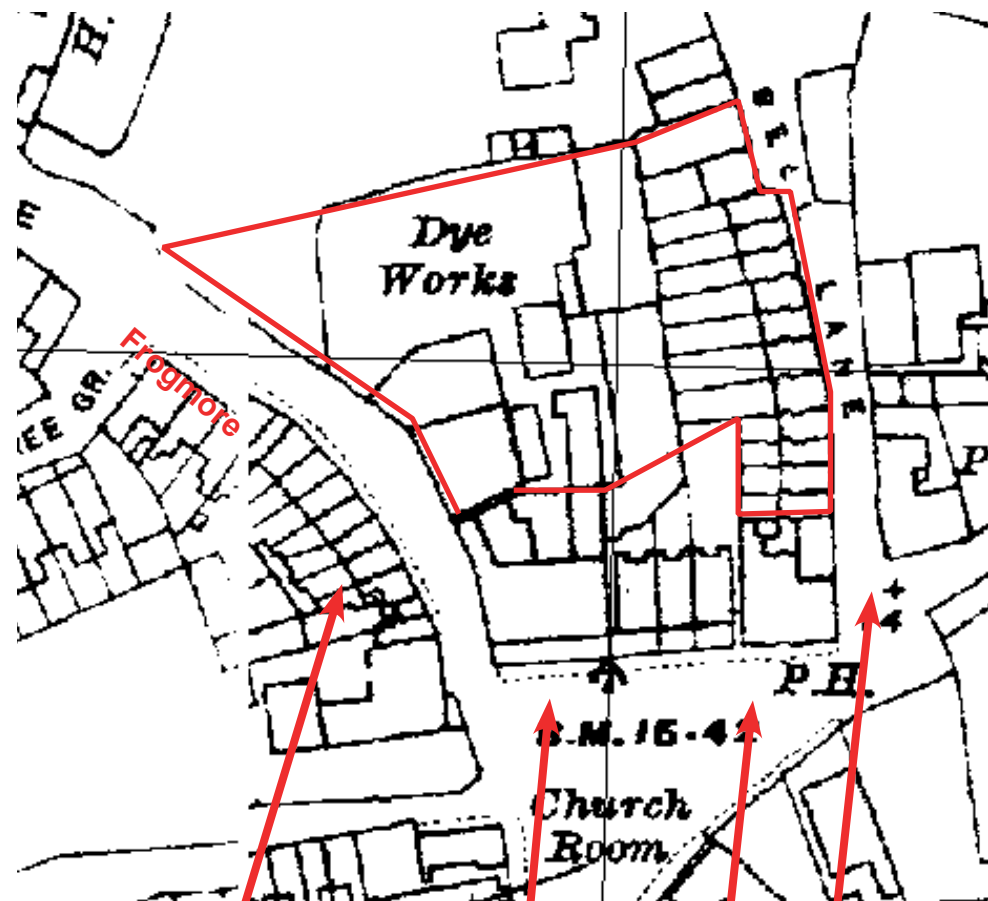
The progression of development post 1896 (last map on previous page), shows the development close to today's existing layout.

Nos 1-3 Dormay Street are demolished post 1851 forming an open yard as shown on the 1956 map, which still exists today.

Post 1951 the small scale buildings on Dormay street are replaced by a large building.

Armoury Way appears for the first time on the 1948-51 map

Extract from Ordnance Survey Map 25" edition, published in 1916



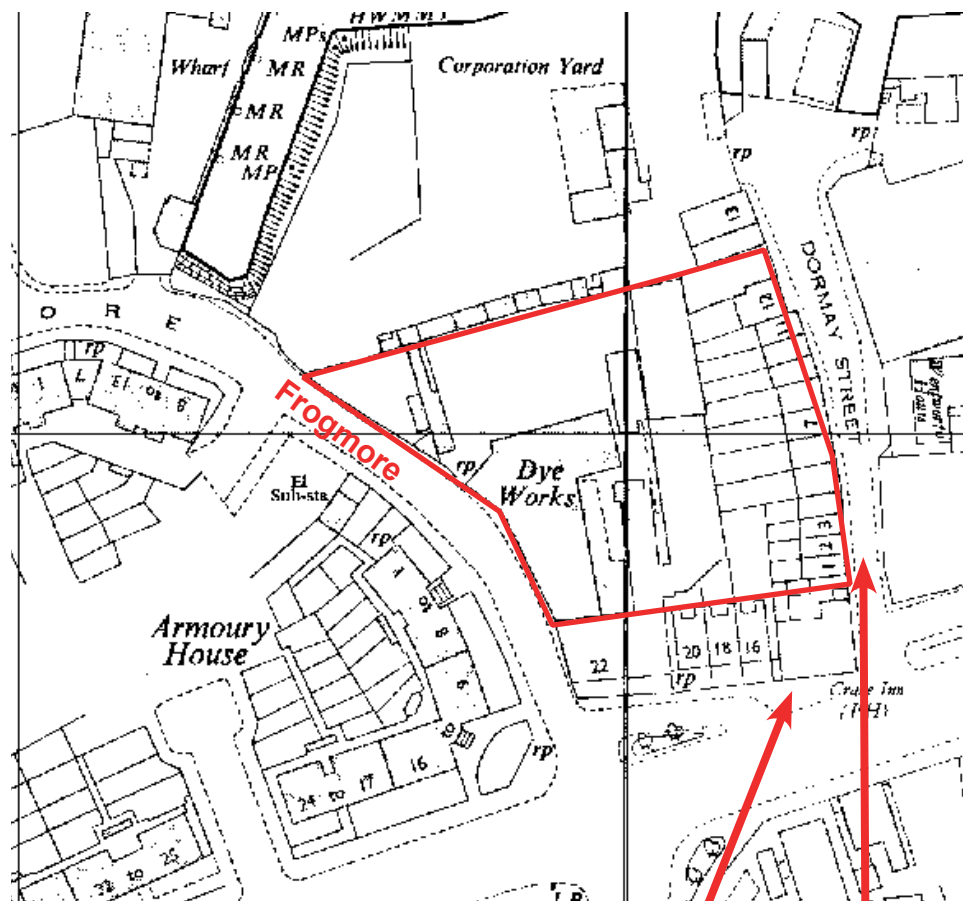
Terraced housing

Dormay St

What is now
16-22 Armoury Way

The Armoury PH

Extract from Ordnance survey 25" edition, published in 1948-51



The Armoury PH

Dormay St

Extract from Ordnance survey 25" edition, published in 1956-1972



The Armoury PH

Dormay St



Dormay Street

The photo opposite obtained from the Museum of London, shows housing previously existed on the western side of Dormay street on the site now occupied by Panorama Antennas.



Grade II Wentworth House opposite
Panorama Antennas's building

Harrison Architects + designers Ltd have considered a number of ways the existing buildings could extended, refurbished and re-developed, with a number of options being identified

These include a mix of floorspaces, looking at a variety of difference uses

We met with LBW planning policy team on the 28th July 2016, to discuss preliminary ideas, and the policies relevant to the site. On the following pages, are a selection of some of the evolving thoughts to indicate how the uses on site could potentially be intensified and supplementary uses added

The two options shown on the following pages adopt an employment led approach.

Never the less, this is an ongoing process, and further dialogue is necessary before we finalise any proposals

Section 7.0

Option 1 - Ground Floor



The strategy behind option 2, is to expand the existing B class uses on site creating a Small business centre on 63 Frogmore and along Dormay Street.

Additional B1c floorspace would be created within the centre of the site within new storeys, and an extension over the carpark area on Frogmore would provide additional B1c & B1 and a small amount of C3 floorspace

- 1.To relocate the parking on Frogmore to within the site on the boundary with the LBW depot site, enabling the area of the site fronting onto Frogmore to contribute to the streetscape, and provide additional floor space
- 2.Extend the Panorama employment use on Ground and 1st floor facing Frogmore
- 3.Replace the Dormay street warehouse with new employment use buildings, and create a small amount of public realm to improve the streetscape.
- 4.Extend the 63 Frogmore reducing the loading yard.



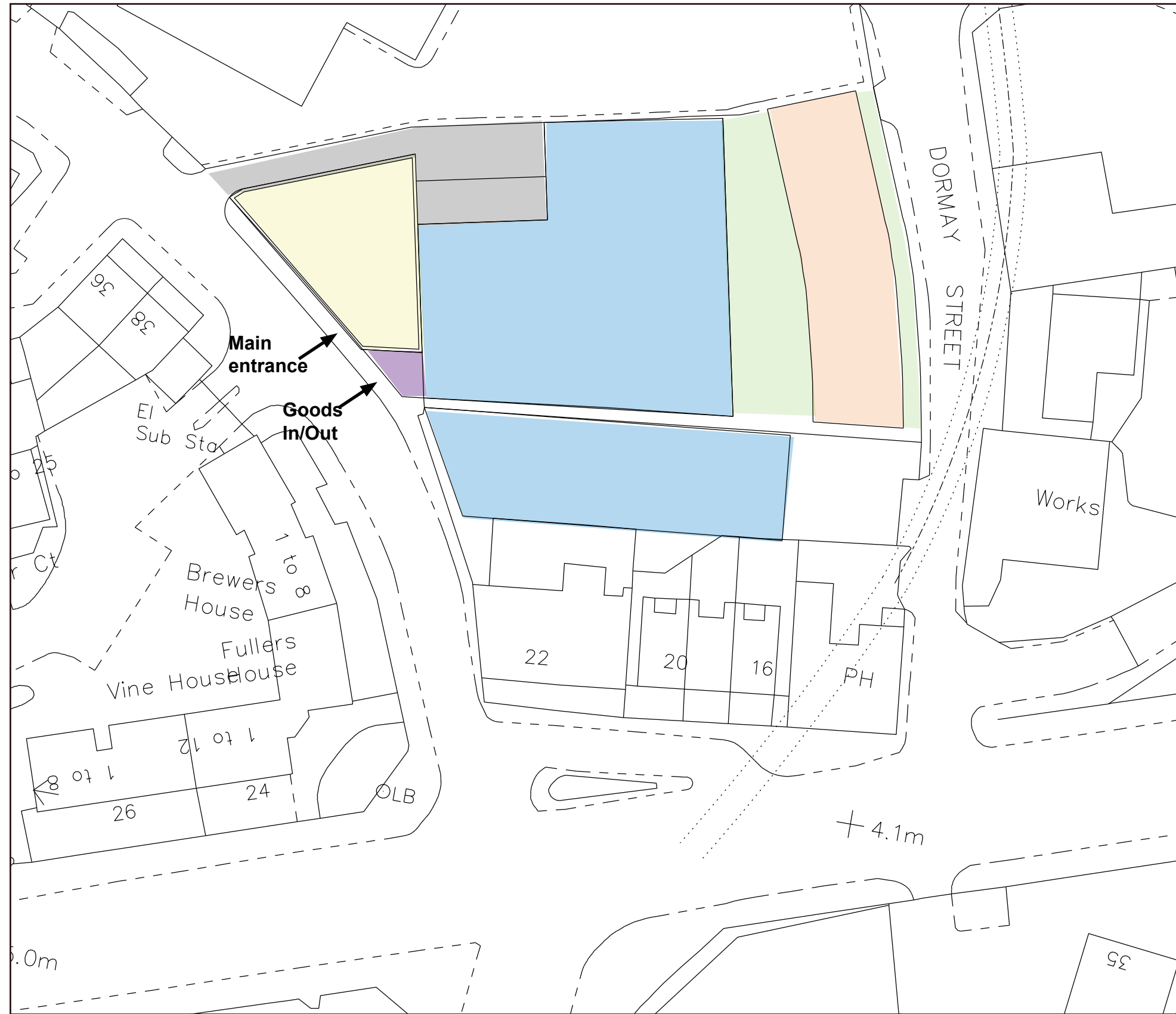
1. The existing portal frame building on No61 Frogmore with high internal spaces is very inefficient in terms of land use. We therefore propose replacing this with a two storey building, the upper floor set back from the boundaries to the south
2. Extend the Panorama employment use on 1st floor facing Frogmore
3. Replace the Dormay street warehouse with new employment use buildings
4. Extend the 63 Frogmore reducing the loading yard.



- 1. We propose an additional storey of Employment space over the centre of the site and Panorama Antennas production area, with buildings to the east onto Dormay street and south along the rear boundaries of the buildings along Armoury Way maintained as 2 storeys.**
- 2. Above the extension facing Frogmore with new employment space on Ground and 1st we propose a small number of residential flats (3-4 units)**

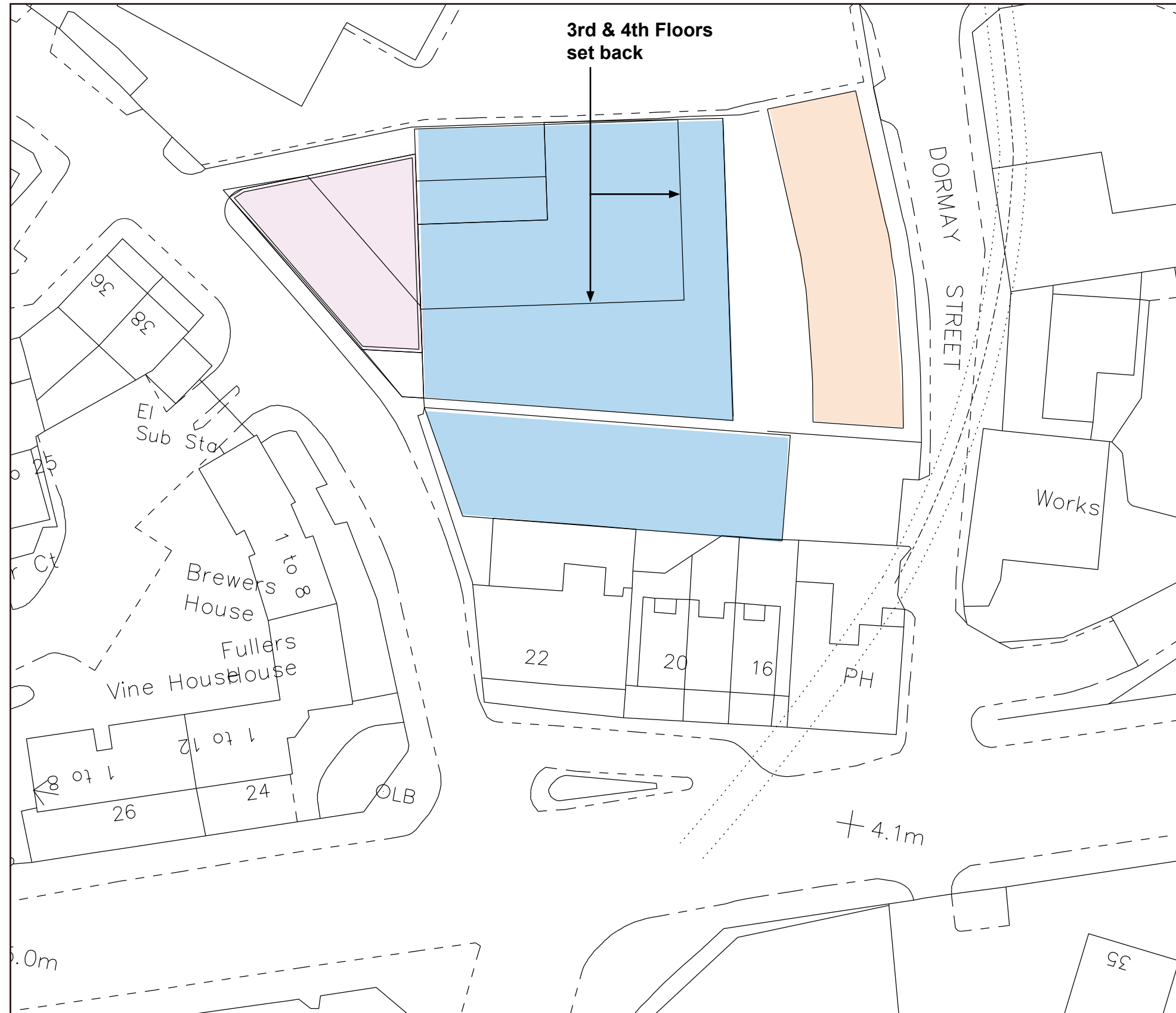


1. We propose a further additional storey (2 in total) of Employment space over the centre of the site and Panorama Antenna s production area, with buildings to the east onto Dormay street and south along the rear boundaries of the buildings along Armoury Way maintained as 2 storeys.
2. Above the extension facing Frogmore with new employment space on Ground and 1st we propose a small number of residential flats (3-4units)



The plan shows how the site could be redeveloped retaining the existing B1c space, plus expansion of employment uses onto Frogmore, plus possibility for new housing along Dormay Street.

- Parking
- Reception and Office
- Storage and Production
- Goods In/Out
- New housing
- Residential Amenity space



The plan shows how the site could be redeveloped retaining the B1c floorspace, and extending the B uses along Frogmore with housing on the upper storeys facing Frogmore.

Residential uses are considered favourable along the perimeter of the retained B uses on site, providing activity to the street frontages replacing closed facades.

- Parking**
- Offices on Level + flats on Levels 2,3,**
- Storage and Production**
- New housing**

- **The study has shown that the site has potential to be re-configured to improve the efficiency of the existing B1c floorspace and intensified to provide new employment floorspace**
- **There is also the potential to provide supporting non-employment floorspace and improve the public realm in this area of significant character change**
- **The scheme options presented are indicative only and their design would be subject to ongoing discussions with LBW planning and design officers and further testing with the site constraints**
- **The site presents a great opportunity for client and LBW to deliver employment land required by the borough.**

Full Name	Doc section	Question	ID	Comment
Mr Alan Pates	Question 1	Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?	EILP1	Central growth strategy
Mr Alan Pates	Question 2	What impact would the decision to leave the EU have on the preferred growth scenario?	EILP2	There will be a need for reasonably priced start up employment units as we will need to regrow UK economy following Brexit debacle and this growth will have to come from the bottom.
Mr Alan Pates	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?	EILP3	Yes
Mr Alan Pates	Question 5	Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?	EILP4	There are pockets of small industrial and office use all over the Borough often connected to local centres. These are very important as they sustain daytime activities and shops, reduce commuting distances and times, provide smaller start up business spaces. A lot of these have been lost to residential development already.
Mr Alan Pates	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?	EILP5	Yes
Mr Alan Pates	Question 7	Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?	EILP6	Employment uses should be encouraged on this site
Mr Alan Pates	Question 9	Are there any other sites or areas within other LSIAs that should be prioritised?	EILP8	A large area in East Putney and Osiers Road has already been lost to employment uses. Any space left should be protected. Other space such as that in Plantation Wharf should also be protected before it too gets lost.
Mr Alan Pates	Question 10	Should the Council continue to protect the other LSIAs in their entirety for industrial-type uses?	EILP7	Yes
Mr Alan Pates	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?	EILP9	Maintaining opportunities for employment uses in any area is very important for the life of the area or it will become a dead dormitory area, soulless and with no character. Much of these areas that have been developed recently are pretty dead during the day.
Mr Alan Pates	Question 12	Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?	EILP10	There has been some employment space provided in redevelopments but it seems to an outside observer that either

Full Name	Doc section	Question	ID	Comment
				the rents are pitched too high or the space is not what is required as a lot seems to have been lost to residential conversion subsequently. One suspects developers are playing the system to maximise profits. The system needs to be tightened up to stop this.
Mr Alan Pates	Question 13	Should the clusters and sites identified above be protected for industrial and distribution uses?	EILP11	Yes
Mr Alan Pates	Question 14	Should this include specific protection for such uses located in railway arches?	EILP12	Yes
Mr Alan Pates	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?	EILP13	No. A way of keeping rents reasonable is by making developers Retain employment uses. It is eat for them to demonstrate no demand by setting rents too high and then saying nobody wants the space.
Mr Alan Pates	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?	EILP14	Yes
Mr Alan Pates	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?	EILP15	Uses in local centres should be protected to keep them lively.

From: Owen, Lucy <lucy.owen@pla.co.uk>
Sent: 31 October 2016 16:18
To: PlanningPolicy
Subject: Wandsworth Local Plan: employment and industry review – policy options

Thank you for consulting the PLA about the Employment and Industry Review that is currently being undertaken by the Council. It is understood that the document will set out relevant planning policies and allocate sites. Page 3 of the consultation document sets out the policies that the document will replace. This includes policy DMI3 of the Development Management Policies Document but does not include policy PL9 of the Core Strategy both of which set out amongst other matters the Council's approach to the safeguarding of wharves.

Section 8.9 of the consultation document sets out the proposed approach in relation to waste and wharves. The Council proposes to review the Local Plan approach to waste and wharves as part of the forthcoming full Local Plan review rather than this partial review. The PLA agrees in principle with this approach but any employment premises and industrial land document should clearly explain that this is the approach that the Council has taken to ensure that there is no confusion as to where the Council's approach to waste and wharves can be found. It is also important to clearly explain the Council's approach as it is proposed to comprehensively review a number of policies but to transfer the relevant parts of policies PL7 and DMI3 over to the Employment and Industrial Local Plan Document.

It is noted that the Smugglers Way small industrial cluster includes the safeguarded Pier Wharf and Smugglers Way. These wharves are protected through London Plan policy 7.26 and policies PL7 and DMI3 of the Local Plan – therefore in answer to question 15 *"should the Local Plan allow change or redevelopment to non-industrial uses provided that there is no demand for the industrial or distribution use"* it would be contrary to planning policy to allow these wharves to be redeveloped. The wharves are safeguarded for waterborne cargo handling uses and the redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer viable or capable of being made viable for waterborne freight handling.

The PLA looks forward to reviewing the submission version of the document in due course.

Regards
Lucy

Lucy Owen
Deputy Director of Planning and Environment
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562384
07738 028540
www.pla.co.uk





Find out about the Cleaner Thames campaign:

- Website: www.pla.co.uk/Cleaner-Thames
- Film: <https://youtu.be/9bsLmgzpHQE>
- Twitter: @LondonPortAuth #cleanerthames

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website: www.pla.co.uk

Full Name	Company / Organisation	Doc section	Question	ID	Comment
Mr Peter Carpenter	Putney Labour Party	Question 1	Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?	EILP31	Wandsworth should base its policy on a growth scenario between the Central and High growth scenarios. i.e. a requirement for industrial land of around 3.5 hectares and a supply of office premises of around 57,000 sq ms.
Mr Peter Carpenter	Putney Labour Party	Question 2	What impact would the decision to leave the EU have on the preferred growth scenario?	EILP32	The decision to leave the EU is unlikely to have any significant impact in the long term 15 year timescale covered by the plan, although it may have an adverse impact on growth in the short term 1-5 years.
Mr Peter Carpenter	Putney Labour Party	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?	EILP33	No.
Mr Peter Carpenter	Putney Labour Party	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?	EILP34	Yes, these are required to maintain a pool of land for the future expansion of industrial land that is forecast in the high growth scenario.
Mr Peter Carpenter	Putney Labour Party	Question 5	Are there additional industrial areas that the borough should also seek to designate as SIL or LSIA?	EILP35	No, the existing areas should be sufficient to accommodate forecast growth into the future.
Mr Peter Carpenter	Putney Labour Party	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?	EILP36	This area which is hemmed in by the railway is appropriate to maintain its existing designation as a Strategic Industrial Location.
Mr Peter Carpenter	Putney Labour Party	Question 7	Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?	EILP37	The Wandsworth Gasholder site should be prioritised for re-designation. I would be more cautious about re-designating the bingo hall because of the potential knock on effects on adjacent sites.
Mr Peter Carpenter	Putney Labour Party	Question 8	Should this re-designation include other sites or areas within the Central Wandsworth or Bendon Valley LSIA's? If so, which areas and why?	EILP91	No. Further redesignation would impact on the ability to deliver the land required for potential industrial expansion under the plan growth scenarios.
Mr Peter Carpenter	Putney Labour Party	Question 9	Are there any other sites or areas within other LSIA's that should be prioritised?	EILP93	No further redesignations at this stage would prejudice the ability to make available sufficient industrial space

Full Name	Company / Organisation	Doc section	Question	ID	Comment
					to meet the potentially forecast requirement over the 15 year plan period.
Mr Peter Carpenter	Putney Labour Party	Question 10	Should the Council continue to protect the other LSIA's in their entirety for industrial-type uses?	EILP92	Yes, but subject to my comments on Questions 48-53.
Mr Peter Carpenter	Putney Labour Party	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?	EILP38	Yes, subject to the continued protection of the New Covent Garden Market.
Mr Peter Carpenter	Putney Labour Party	Question 12	Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?	EILP39	Yes, but release should be gradual and achieve over a longer period than the 15 year planning horizon.
Mr Peter Carpenter	Putney Labour Party	Question 13	Should the clusters and sites identified above be protected for industrial and distribution uses?	EILP40	The Warriner Gardens site has the potential for de-designation. I would be cautious about de-designating other sites.
Mr Peter Carpenter	Putney Labour Party	Question 14	Should this include specific protection for such uses located in railway arches?	EILP41	Yes. These are a valuable asset.
Mr Peter Carpenter	Putney Labour Party	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?	EILP42	Yes, but redevelopment should be for other commercial uses which protect employment. The sites are not suitable for residential use.
Mr Peter Carpenter	Putney Labour Party	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?	EILP43	Yes. The likelihood is that the extensive regeneration occurring in Wandsworth over the plan period will draw in additional industrial and commercial requirements to support the expansion, so any plan should embrace the medium to high growth scenarios. There is no justification for reducing the overall amount of land reserved for industrial and distribution use. Any de-designations should therefore be complemented by new designations to maintain the overall amount of land available for industrial and distribution use.
Mr Peter Carpenter	Putney Labour Party	Question 17	Are there any additional measures that could be taken to mitigate the loss of industrial land, such as further	EILP44	Yes, there are opportunities for intensification on some sites and some distribution functions could be moved outside the borough given the integrated nature of the

Full Name	Company / Organisation	Doc section	Question	ID	Comment
			intensification of industrial areas or the identification of sites outside the borough where industrial businesses could relocate to?		London economy. But any such policy will need to be integrated with the Local Plans of other Boroughs and the London Plan to avoid attempting to rob Peter to pay Paul.
Mr Peter Carpenter	Putney Labour Party	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?	EILP99	Yes, these are all areas where office employment will benefit the local community.
Mr Peter Carpenter	Putney Labour Party	Question 19	Are there other parts of the borough where existing offices should be protected?	EILP45	There should be a general presumption of protection of office space except in areas where former residential space has been converted into offices.
Mr Peter Carpenter	Putney Labour Party	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?	EILP46	Yes, these uses should continue to be protected in Town Centres and local shopping parades.
Mr Peter Carpenter	Putney Labour Party	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?	EILP47	Yes, but it should be considered as a contribution to the London requirement, not to the specific office requirements for local employment in Wandsworth.
Mr Peter Carpenter	Putney Labour Party	Question 22	Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?	EILP48	No. Pressure from property developers to maximise profits has resulted in office space being squeezed out of developments. Wandsworth planning policies should ensure that redeveloped spaces reprovide existing office space and provide for the additional office space requirement forecast.
Mr Peter Carpenter	Putney Labour Party	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[1]?	EILP51	Planning policies should ensure that developments in Town Centre sites retain at least their existing office floorspace. Expansion of office floorspace should be focussed on edge of centre sites and sites located close to existing and forthcoming transport centres. Crossrail 2 will provide significant opportunities for the expansion of office space, but this is unlikely to be delivered until

Full Name	Company / Organisation	Doc section	Question	ID	Comment
					towards the end of the pain period, so reliance on it should not be factored into the office space expansion plans.
Mr Peter Carpenter	Putney Labour Party	Question 24	Are the areas listed above the most appropriate for new office development?	EILP52	Most of the industrial sites will continue to be required to meet forecast demand, so we should be cautious about redesignating industrial sites for office use, though there may be scope for dual use in some locations where the office use supports the industrial use.
Mr Peter Carpenter	Putney Labour Party	Question 25	Are there other areas or sites that the Local Plan should seek to designate for new office development?	EILP53	The Bus Garage off Putney High Street. This could be replaced by intensification of the use of the Wandsworth bus garage site.
Mr Peter Carpenter	Putney Labour Party	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?	EILP54	Yes. The Wandsworth Gas Holder site is particularly well located for such intensification.
Mr Peter Carpenter	Putney Labour Party	Question 27	Are there other areas, either surrounding these sites or elsewhere, that should also be designated as Employment Intensification Areas?	EILP55	The surrounding areas of the Wandsworth Gasholder site and the former Bingo Hall in Brendan Valley are already well used, so probably would not benefit from re-designation.
Mr Peter Carpenter	Putney Labour Party	Question 28	Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?	EILP56	The MUFIEA designation seems to have resulted in a considerable amount of residential rather than office building on these sites. Redesignation as an Employment Intensification Area would encourage office, rather than residential development.
Mr Peter Carpenter	Putney Labour Party	Question 29	What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?	EILP57	There would be no advantage in redesignation of the areas if housing provision were to be allowed.
Mr Peter Carpenter	Putney Labour Party	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	EILP58	Yes. All of these are relevant.

Full Name	Company / Organisation	Doc section	Question	ID	Comment
			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.		
Mr Peter Carpenter	Putney Labour Party	Question 31	Are there any additional issues that should be addressed through the Area Spatial Strategy and site allocations?	EILP59	Density of development. Both height and spacing of buildings.
Mr Peter Carpenter	Putney Labour Party	Question 32	Are there any additional sites that should be set out as a detailed site allocation in the Wandsworth LSIA or surrounding area?	EILP94	None that immediately come to mind.
Mr Peter Carpenter	Putney Labour Party	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?	EILP60	The Wandle Delta strategy fails to provide a continuous Thameside path, and should be amended to do so.
Mr Peter Carpenter	Putney Labour Party	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?	EILP61	If the site is to be redesignated, then a spatial strategy and site allocation needs to be developed for the former Bingo Hall site.
Mr Peter Carpenter	Putney Labour Party	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?	EILP62	Yes. There should be some guidance about what is meant by 'realistic rents'.
Mr Peter Carpenter	Putney Labour Party	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	EILP63	Yes. There has been pressure to convert ground floor employment uses to residential in some sites with a significant loss of their employment potential. Segregating office and residential in separate buildings could help mitigate this.

Full Name	Company / Organisation	Doc section	Question	ID	Comment
			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?		
Mr Peter Carpenter	Putney Labour Party	Question 37	Should the Local Plan require major regeneration initiatives to include provision of employment floorspace?	EILP64	Yes. Otherwise we will create dormitory areas. Particular attention should be paid to providing incubator space for new and growing companies.
Mr Peter Carpenter	Putney Labour Party	Question 38	If so, should this floorspace be of a particular type or size?	EILP65	As indicated above as well as retail and office space, some incubator space should be provided. Units should be large enough to generate a viable employment environment, say 1,000 sq m.
Mr Peter Carpenter	Putney Labour Party	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?	EILP66	Yes. Creative employment is likely to form an increasing proportion of employment going forward. Given that 5.7% of the workforce is currently employed in this area and they are a relatively intensive user of space, 10% might be an appropriate allocation. This could be secured by S106 agreements.
Mr Peter Carpenter	Putney Labour Party	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?	EILP67	Yes. There is the opportunity to return former cultural assets such as the Gym on Wandsworth High Street and the Bingo Hall in Mitcham Road and possibly the former Bingo Hall in Bendon Valley to Theatre and cultural use. This could be encouraged by restrictions on the type of development allowed on these sites and the use of S106 agreements on related developments to fund bringing them back into use.
Mr Peter Carpenter	Putney Labour Party	Question 41	Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?	EILP68	Yes. Otherwise local employers will be driven out of the area with adverse knock on effects on retail.
Mr Peter Carpenter	Putney Labour Party	Question 42	If so, should this be on developments of a particular type or size, and in particular parts of the borough?	EILP69	We should continue to ensure that Town Centre space is reserved for local businesses, but to ensure affordability this might be on secondary frontages. The continued

Full Name	Company / Organisation	Doc section	Question	ID	Comment
					availability of smaller unit sizes suitable for local businessessers should be secured.
Mr Peter Carpenter	Putney Labour Party	Question 43	How should affordable workspace be secured – for example through s106 agreements?	EILP70	S106 agreements will have a role in securing affordable workspace in new developments. In existing developments continued use can be secured through the designation process.
Mr Peter Carpenter	Putney Labour Party	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?	EILP71	Managed workspace is not always affordable as management charges can be high. It would be better to secure it by setting a maximum percentage of market rent as is done with 'Affordable Homes'.
Mr Peter Carpenter	Putney Labour Party	Question 45	Should the Local Plan require managed workspace to be provided on new developments in the borough?	EILP72	Yes, but it is probably not appropriate to provide it on all new developments, only on the larger ones. Managed workspace is probably better located at edge of Town Centre locations.
Mr Peter Carpenter	Putney Labour Party	Question 46	If so, should this be on developments of a particular type or size, and in particular parts of the borough?	EILP95	It should be on the larger developments which can support a viable level of managed workspace. These are likely to be located at the edge of Town Centres to ensure affordability.
Mr Peter Carpenter	Putney Labour Party	Question 47	How should managed workspace be secured – for example through s106 agreements?	EILP73	Managed workspace should be specified as a % of the employment space mix, say 10% in the planning guidance for specific sites. It's continued use as such could be secured through S106 agreements.
Mr Peter Carpenter	Putney Labour Party	Question 48	Should the Havelock Terrace area be designated as Industrial Business Park?	EILP74	There is merit in designating Havelock Terrace as an Industrial Business Park as recommended by ELPS.
Mr Peter Carpenter	Putney Labour Party	Question 49	Are there other designations that would be more appropriate for the Havelock Terrace area?	EILP96	No, but it could retain its existing designation.
Mr Peter Carpenter	Putney Labour Party	Question 50	Should any other parts of the SIL be redesignated as Industrial Business Park?	EILP75	The Industrial Business Park designation could be extended to other parts of the SIL where appropriate.
Mr Peter Carpenter	Putney Labour Party	Question 51	Should the Local Plan allow residential uses in any part of the SIL?	EILP76	No. It is best to avoid mixing industrial and residential uses as it can lead to considerable friction between the two types of users. The development of flats close to the Western Riverside Waste disposal facility in Smugglers Way has caused friction with the new residential tenants.

Full Name	Company / Organisation	Doc section	Question	ID	Comment
Mr Peter Carpenter	Putney Labour Party	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?	EILP78	REdesignating part of the Stewarts Road area as Industrial Business Park might facilitate the redevelopment which has not yet come to fruition.
Mr Peter Carpenter	Putney Labour Party	Question 53	Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?	EILP77	Yes. The forecasts show a continuing requirement for these uses.
Mr Peter Carpenter	Putney Labour Party	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?	EILP97	Given the potential shortfall of industrial space over the plan period it is appropriate to retain this provision, though replacement could be provided on an adjacent site.
Mr Peter Carpenter	Putney Labour Party	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?	EILP98	Yes, given the potential shortfall in industrial land over the plan period.
Mr Peter Carpenter	Putney Labour Party	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)?	EILP79	Yes. This is an important site for wholesale distribution and should continue to be protected.
Mr Peter Carpenter	Putney Labour Party	Question 57	Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?	EILP80	Yes, but the marketing requirement could be extended to 2 years and the owner should need to demonstrate he has taken all reasonable efforts to market it.
Mr Peter Carpenter	Putney Labour Party	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?	EILP81	There should be an 'all reasonable efforts' requirement to market it.
Mr Peter Carpenter	Putney Labour Party	Question 59	Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?	EILP82	To demonstrate 'all reasonable efforts' the owner would have to provide details of marketing spend and when and where it was made.

Full Name	Company / Organisation	Doc section	Question	ID	Comment
Mr Peter Carpenter	Putney Labour Party	Question 60	Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?	EILP83	Yes in Town Centres employment space should continue to be protected.
Mr Peter Carpenter	Putney Labour Party	Question 61	Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?	EILP84	Yes, but there may be areas where more flexibility is required. An alternative use is preferable to a peerperpetually empty building.
Mr Peter Carpenter	Putney Labour Party	Question 62	Are there other places or situations in which alternative uses for redundant employment premises should be restricted?	EILP85	Where the proposed alternative use would conflict with adjacent uses.
Mr Peter Carpenter	Putney Labour Party	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?	EILP86	Yes, it is sensible to await the London Plan review before reviewing these.
Mr Peter Carpenter	Putney Labour Party	Question 64	Should the sites allocated for waste management be retained, as set out in the adopted SSAD 2016?	EILP87	Yes, it is sensible to await the review of the London Plan before reviewing these.
Mr Peter Carpenter	Putney Labour Party	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?	EILP88	Yes, it is sensible to await the review of the London Plan before reviewing these.
Mr Peter Carpenter	Putney Labour Party	Question 66	Do the policy options set out in the sections above accurately reflect the evidence base?	EILP89	Yes, subject to the comments I have made.
Mr Peter Carpenter	Putney Labour Party	Question 67	Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?	EILP90	I have no further suggestions at this stage.

4 November 2016
Delivered by email

Policy and Design Team
Planning and Transportation Division
Environment and Community Services
Town Hall
Wandsworth High Street
London SW18 2PU

Dear Sir/Madam

REPRESENTATIONS TO THE EMPLOYMENT AND INDUSTRY LOCAL PLAN REVIEW: POLICY OPTIONS CONSULTATION

LAND AT JAGGARD WAY, WANDSWORTH

On behalf of Rockspring Property Investment Managers (PIM), we are pleased to make representations to the Employment and Industry Local Plan (EILP) Review: Policy Options consultation.

These representations focus specifically on Question 13 posed by the EILP Review:

“Should the clusters and sites identified above [industrial clusters and undesignated sites] be protected for industrial and distribution uses?”

These representations make specific reference to land at Jaggard Way, which is identified as undesignated industrial cluster C24. The site is owned by Cheshire West and Chester Borough Council, but managed by Rockspring PIM.

SHOULD THE UNDESIGNATED INDUSTRIAL SITES BE PROTECTED?

It is considered that the EILP **should not** protect the undesignated sites for the following reasons:

- Future industrial demand should be accommodated within existing Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs) which themselves need a holistic reconsideration to ensure they are of the right scale and in the right locations
- The undesignated sites, in particular site C24, are appropriate for redevelopment to other uses

These reasons are now discussed in turn.

The Charlotte Building
17 Gresse Street
London
W1T 1QL

T 020 7851 4010 turley.co.uk

Industrial demand

The EILP Review offers three industrial land supply and demand growth scenarios for the period 2016-2030 (which have been based on the ELPS). We note that the low growth scenario is data based on GLA Economics forecasts for the borough itself while the high growth forecasts reflect growth rates across a wider Functional Economic Area (para 8.6 and 8.8).

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

It is not the intention of these representations to comment on the growth scenario to be taken forward. The point to be made is that regardless of which growth scenario is ultimately taken forward, it is considered that the undesignated industrial clusters are not needed to accommodate additional industrial demand.

The evidence based document which underpins the EILP (the Employment Land and Premises Study (ELPS) (2016) prepared by AECOM) reaches this very conclusion (xiii):

“The majority of employment land within existing SIL and LSIA’s remain the most suitable locations in Wandsworth for accommodating this industrial and warehousing demand. This corresponds to the principles set out in London Plan Policy 2.17. By comparison the Borough’s MUFIEAs and non-designated industrial areas generally either contain average/poor quality sites (albeit with some good examples) and are considered appropriate for redevelopment for other uses where there is demand for this.”

The approach by which Wandsworth’s industrial sites are assessed in terms of their suitability is also set out in this document. Seven of the eleven non designated sites (including land at Jaggard Way) are assessed as having ‘indirect’ strategic road access. Indeed strategic road access is a key determiner of the quality and fitness for purpose of an industrial site, and access to an efficient transport network is becoming even more of a critical locational factor for modern industrial business practice as clients and customers have greater and more time-critical expectations. Therefore, the land at Jaggard Way is not so well placed as others to meet the needs of industrial land occupiers due to these weaker road linkages.

Further, we note that the assessment of sites does not consider fully the preferred location characteristics of industrial land occupiers. One such characteristic is proximity to market (and not purely road access). Most growth is expected in industrial land activities with a time-critical nature, necessitating their location in the Central Activities Zone (para 8.2.16). Other sites in the borough are therefore better suited for industrial uses. Quality and fitness for purpose

In addition, Jaggard Way is referenced as being ‘disparate’ (para 4.8.2), reflecting the fact that it does not play a specific role with regards to employment land. We therefore consider that the site does not directly support economic objectives of the borough in the way that other industrial locations do.

Appropriateness for redevelopment at C24 (land at Jaggard Way)

As noted in the ELPS conclusion above, the undesignated industrial sites are considered appropriate for redevelopment for other uses, where there is demand for this. In particular, we consider that this is true of the land at Jaggard Way, site C24.

Indeed, Rockspring PIM engaged in pre-application discussions with Wandsworth Council in February 2015 in respect of a residential led redevelopment for 112 units with associated car parking and public realm and landscaping improvements. The pre-application advice received from officers was positive and the principle of a residential led redevelopment was **supported**. It was considered by officers that the site represented an opportunity to bring forward a high quality development design, replacing the existing unattractive industrial 'sheds'.

Furthermore, it is considered that a residential use at this site is more appropriate in terms of amenity, as a residential development would have a lesser impact on the surrounding uses (which are predominantly residential) than industrial uses, which are noisier and are better located in larger industrial estates away from residential uses. Also, a residential development here aligns with the thrust of emerging government housing policy, which is to secure a higher amount and density of housing around commuter hubs (which includes railway stations such as Wandsworth Common).

It is still the intention of Rockspring to bring the site forward for a residential use (taking account of comments received at the pre-application stage) and a planning application is expected to be submitted early 2017.

CONCLUSION

Question 13 of the EILP Review asks whether Wandsworth's undesignated industrial sites and clusters should be protected. It is our view that they **should not** be protected.

We have reached this conclusion on the basis that the future industrial demand should be accommodated within existing SILSs and LSIAs (as identified by the ELPS), and also because in particular, site C24, would be appropriate for redevelopment for a residential-led scheme.

We trust that our comments will be taken on board. We also reserve the position to submit further justification and evidence in due course to support our position.

If you have any queries or require further information, please contact me or my colleague Michael Lowndes.

Yours faithfully

Craig Slack
Senior Planner

craig.slack@turley.co.uk

04 November 2016



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

65 Gresham Street
London
EC2V 7NQ
T: +44 (0)8449 02 03 04
F: +44 (0)20 7911 25 60

gva.co.uk

Dear Sir/Madam

Direct Dial: 020 7911 2054
Email: ian.buzza@gva.co.uk

RE: REPRESENTATIONS – WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS CONSULTATION DOCUMENT (OCTOBER 2016)

Please see the attached report in response to your consultation exercise on the Wandsworth Local Plan: Employment and Industry Review – Policy Options Consultation Document. We respond on behalf of our client 'Safestore Ltd' whose interest relates to the future designations of three sites located within the London Borough of Wandsworth.

We are keen to positively engage with the Council during employment land review. Safestore Ltd, as a significant landowner of employment land in the Borough, is willing to open up discussions with the Borough to assist with the reviews taking place.

If you have any queries or require any further information please do not hesitate to contact Iain Buzza (020 7911 2054) or Kate Outterside (020 7911 2826) at these offices.

Yours sincerely

GVA Grimley Ltd
On behalf of Safestore Ltd



Report

Bilfinger GVA
65 Gresham Street
London
EC2V 7NQ

Safestore

Wandsworth Local Plan: Employment and Industry Review (Policy Options October 2016)

November 2016



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Appendix 1 – Review of LB Wandsworth Employment Land Evidence Base.

Appendix 2 – Safestore Site Plans

1. Introduction

- 1.1 We write in response to your consultation exercise on the Wandsworth Local Plan: Employment and Industry Review (Policy Options October 2016).
- 1.2 We submit this response on behalf of our client Safestore Ltd who owns three sites located within the London Borough of Wandsworth, these sites are located at Ingate Place, 19 Lombard Road in Battersea and 1 Bendon Valley on Garratt Lane. Site plans provided in Appendix 2.
- 1.3 In terms of current Local Plan allocations, the Ingate Place site is located within a Strategic Industrial Location (SIL), 1 Bendon Valley is located within a Locally Significant Industrial Area (LSIA) and 19 Lombard Road is located within a Mixed Use Former Industrial Employment Area (MUFIEA).
- 1.4 Employment uses are the established land use allocations for these three sites. However, like many employment sites within the borough they are not currently optimising their full potential to deliver employment facilities and job creation for the benefit of the borough overall. As such, we welcome the opportunity to work proactively alongside the borough to review investment and re-development opportunities for these sites to help the Council deliver the objectives and targets of its Local Plan.
- 1.5 Safestore Ltd has been keen to engage with the London Borough of Wandsworth (LBW) on the employment and industry review. A letter, dated 27th January 2016, was submitted to LBW in relation to the preparation stage documents. The concluding comments from this letter highlighted that we believe it is critical that the evidence base is developed in a manner that understands in detail what activity is occurring within a site/building rather than making assumptions based on historic designations, previous land use data or building typologies. In order for the Council to fully understand the context of the existing Safestore sites we would welcome further engagement between Safestore Ltd and LBW Officers as we suggest that the operations of the Ingate Place Safestore site, in particular, are not fully understood.

- 1.6 To help better understand the operations of each Safestore site we have provided answers to the Policy Options consultation document and we provide a Review of the LB Wandsworth Employment Land Evidence Base at Appendix 1.

2. Local Plan Preparation

- 2.1 The NPPF states that Local Plans should be positively prepared, seeking opportunities to meet needs in their area. There is currently a clear growth agenda at a national and regional level seeking to optimise economic development, as well as housing. The NPPF sets an overarching emphasis on encouraging new development, ensuring it is not overburdened by the planning process, with a presumption in favour of sustainable development at its heart. Redeveloping brownfield employment sites is considered sustainable development and in accordance with the NPPF.
- 2.2 Paragraph 160 of the NPPF states that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.
- 2.3 The London Plan outlines that a rigorous approach should be taken to industrial land management to ensure a sufficient stock of land and premises is retained to meet the needs of different types of industrial and related uses. Where compatible the London Plan states that the managed release of surplus industrial land should be undertaken especially to provide more housing in appropriate locations.

3. Response to Questions

- 3.1 Our client supports the review of the London Borough of Wandsworth Local Plan: employment and industry review and provide the following commentary with regards to the questions set out in the '*Policy Options Consultation Document*'.
- 3.2 This document deals in turn with the questions which are deemed to be appropriate to the interests of Safestore Ltd exclusively. It should be noted that commentary is not provided on all questions within the '*Policy Options Consultation Document*'.

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?

- 3.3 Safestore recognise the importance that SIL plays in providing jobs and services to the London Borough of Wandsworth. However, it is important that these designations are applied correctly to ensure that sites contained within a SIL actually operate in such a manner.
- 3.4 Within London, there are two types of SIL which meet and support the requirements of different sorts of industrial employer: Preferred Industrial Locations (PILs) and Industrial Business Parks (IBPs). The London Plan (2016, Para. 2.83) states that the boundaries of SILs should be defined in Local Plans taking into account the strategic and local assessments of supply and demand for the industry. The AECOM '*Employment Land and Premises Study*' states that the net demand forecast for employment land is -9.5 ha which is translated into the potential release of 6.5 ha. Therefore revisions are required to be undertaken to the existing employment land and boundaries of the existing SILs and LSIA should be undertaken.
- 3.5 With respect of SIL and LSIA designation, it is the responsibility of boroughs to identify suitable locations and develop local policies; these policies and locations for employment sites need to be based on clear and robust assessments of need to protect their function, to enhance their attractiveness and competitiveness for industrial type activities.
- 3.6 In addition, it should be noted that the NPPF (at 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. It is

therefore crucial that the evidence base provided to support the allocations of sites for SIL/LSIA needs to be carefully considered in order to ensure that appropriate sites are designated for employment use. Applying the designations to the same areas as in previous or existing development plan documents is not an accurate exercise and fails to demonstrate a clear understanding of business needs and trends in the area. As such, we suggest that if broadly similar locations are proposed for these designations, the precise functions of sites within the area should be fully understood otherwise there is a risk of stifling investment and redevelopment opportunities.

- 3.7 Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. Whilst it can be stated that the AECOM report appraises the existing employment market in order to accurately assess the existing market conditions, the London Borough of Wandsworth should also work closely with the business community, both landlords and tenants.
- 3.8 At present, we consider that further work is required in order to generate a sufficient evidence base in order to further consider the allocations of SIL and LSIA. This could be done by further engagement with landowners. Failure to consider enhancing the existing evidence base will mean that the policy allocations proposed may not be considered to be positively prepared or justified. As highlighted previously, Safestore are happy to meet with LBW officers and their advisors to demonstrate the nature of operations at each Safestore site.

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?

- 3.9 As set out in Paragraphs 3.3 to 3.8 above, Safestore Ltd recognise the importance of SIL designations. However, the designations should be based upon an up to date evidence base which clearly looks at the existing functions of sites within the area and these considerations should be applied consistently across the exercise.
- 3.10 As such, the important consideration is the application of specific categories of SIL within the over-arching designation and providing a clear justification for retention of PIL and the designation of new IBP locations. This should be applied consistently across the borough's SIL portfolio based on the character and activities of each.
- 3.11 For the Queenstown Road SIL this is a particular issue given the northern portion has a materially different character to that in the south. For the reasons set out in the

-
- supporting evidence to this submission (Appendix 1) a consistent application of PIL and IBP should be made to set a clear and consistent direction for the area.
- 3.12 For the Safestore site at Ingate Place the only 'pure' PIL type activity is the self-storage facility insofar as it is technically a B8 use. However even this misrepresents the operational nature of the self-storage facility, which is materially different from a typical commercial storage/warehouse operation.
- 3.13 The Safestore facility does not generate the same levels of HGV activity and has a servicing requirement much more closely aligned with domestic scale vehicles, either private car or small 'transit' style vans. The 'front door' of a Safestore facility is more akin to a retail or professional office environment and does provide some minor retail activities.
- 3.14 In many parts of London self-storage is successfully integrated into non-industrial sites, forming integrated components within a mixed use building or a larger mixed use site. Therefore the presence of the self-storage activity should not be a basis for retention of the PIL designation at Ingate Place as it does not function like, or require co-location with, traditional industrial activity. Rather, it could be argued to align more with small scale distribution businesses which do fall within the definition of acceptable uses within an IBP.
- 3.15 The evidence base and policy approach should reflect the unique characteristics of this increasingly important activity, especially as its operation 'crosses' over traditional use class definitions, and use its presence as a mechanism to intensify wider employment activity on suitable sites.

Question 7: Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

- 3.16 The former bingo hall in Bendon Valley and the Wandsworth gas holder site should be prioritised for re-designation. The Local Plan alongside the London Plan acknowledges the borough's objectives with respect of infrastructure, jobs and housing and the above sites are considered suitable to offer non-employment uses and be suitable to achieve the objectives set out within the Local Plan.
- 3.17 The findings of the ELPS which conclude that both sites would be suitable for redevelopment are reasonable. However, it should be noted that the former bingo hall in Bendon Valley is located next to a Safestore site (Garratt Lane) and that release of the former bingo hall could have an impact on the existing functioning Safestore site. Safestore acknowledge that the former bingo hall is suitable for intensification and redevelopment but this should not compromise the operational capacity of the Safestore site in any way. It will therefore be important to ensure that

this is acknowledged/recognised as part of the release process/ in any subsequent site specific policy allocation and Safestore would welcome the opportunity to discuss this further with Officers?

Question 9: Are there any other sites or areas within other LSIAs that should be prioritised?

- 3.18 Additional sites which are considered suitable for release as a result of the employment and industry review include the Safestore site on Garrett Lane, adjacent to the site of the former bingo hall which is proposed for release.
- 3.19 Substantial planning and design benefits could be delivered from releasing the whole urban block, especially in design terms in relation to Local Plan Policy IS3 which requires that the layout, form and design of new buildings and spaces should contribute positively to the local environment and, inter alia, create functional, attractive and accessible places. In addition, Local Plan Policy IS3(b) considered that designs and layouts which make efficient and effective use of land should be promoted. De-designating both the former bingo hall and the Garrett Lane Safestore site would allow for redevelopment of the whole urban block which would satisfy the adopted design policies.

Question 12: Should the Local Plan continue to allow the loss of industrial and distribution uses in the MUFIEA areas?

- 3.20 Core Strategy Policy PL6 and Policy DMI 2 of the Development Management Policies Document currently requires mixed use redevelopment with the re-provision of the existing employment floorspace, rather than the total loss of industrial and distribution floorspace in these areas. These are established policies that is helping towards creating new communities such as the Lombard Road area.
- 3.21 Policy PL6 states that mixed use redevelopment including a residential component is acceptable where net employment floorspace equivalent to the existing employment space is provided. The requirement for the re-provision of employment floorspace includes all floorspaces in the following use classes: A1-A5, B1, B2, B8, D1 and D2. In addition, the change of use from industrial to mixed use is required to confirm compatibility with neighbouring uses, the use will not harm the viability of the surrounding employment area and the existing surrounding uses will not have an adverse impact on the amenity of new residential space.
- 3.22 We consider that the existing policy provides the suitable conditions to meet the objectives of the Local Plan in so far as providing flexibility on sites to provide employment and other uses, such as residential.

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- 3.23 To conclude, we suggest that the Local Plan should continue to seek replacement industrial and distribution uses in the MUFIEA areas, where it can be demonstrated that such uses are compatible.

Question 16: Are there reasonable justifications for exceeding the low growth demand forecast, either for industrial 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?

- 3.24 Based on our understanding of the GLA Economics forecasting model we believe that there is the potential for Wandsworth to achieve a level of employment growth across use classes that exceeds the "low growth" scenario.
- 3.25 The GLA Economics employment growth projections (Summer 2016) have been prepared on the basis of projecting historic trends forwards into the future, effectively suggesting that the current nature of the economy is what will be predominant in the future.
- 3.26 In many locations across London this may well be the case, however it is clear that the major growth and regeneration programme will fundamentally change the borough's economic prospects and opportunities, particularly in the north of the borough as the VNEB area becomes more closely integrated into the CAZ.
- 3.27 It would be reasonable to assume that this change will have a multiplier effect through Wandsworth as businesses are either displaced from VNEB or supply chain activities are attracted to the borough. This spin out and supply chain opportunity is likely to be heightened by improved public transport provision.
- 3.28 We can see the limitations in the low growth forecast when the growth rates for Wandsworth are compared to those for the FEMA, which have more positive forecast growth rates. There is no clear justification for why the ELPS considers Wandsworth would perform significantly differently from the wider area, particularly if the economic context is changing in a way that is making Wandsworth more like other parts of the FEMA.
- 3.29 The analysis within the ELPS also fails to make clear some forecasting methodology points which may also affect the level of employment growth the ultimate projections predict.
- 3.30 Firstly, the low growth projection relies solely on the GLA Economics projections and makes little or no obvious adjustment to understand how changes in the FEMA may alter the scale and nature of future growth. As noted above this could affect supply chain demand as other economic nodes grow. Growth and development

elsewhere in the FEMA may also displace economic activity from other places, and provide an opportunity for Wandsworth to capture new investment and occupiers, growing and diversifying the current business base and requiring a wider range of sites and premises.

- 3.31 Secondly, it is unclear how the ELPS has translated the total employment growth projection provided by the GLA into different sector activities and, in turn, into land use requirements. This process is a critical part of ensuring supply is appropriately focussed to meet future demand both in terms of the quantum of space and its distribution between different use classes and locations.
- 3.32 Based on these factors we do believe an alternate, higher growth, scenario could be achieved. Importantly though this may not necessitate additional floorspace but will necessitate a more considered approach to what type of activity will be accommodated within it, and therefore the designation it is given.
- 3.33 In locations with appropriate characteristics this may require greater flexibility in industrial locations to accommodate the key demand that will come from Central City servicing activity. This will enable those that offer good accessibility to the CAZ to accommodate a broader spectrum of property providing the ability to flex and change to meet demands over time.

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?

- 3.34 The borough should continue to plan positively for the provision of new large-scale office provision to build on the increasing market profile and success of Battersea Power Station. All the forecasts within the ELPS show a positive need for more space, which the on-going success of VNEB is likely to exacerbate.
- 3.35 However, it should be recognised that the VNEB area has limited capacity and the direction of development already delivered provides a clear demonstration of the competing demands on its land resources, with a strong residential lead likely to be continued.
- 3.36 As such, whilst large scale offices should be supported here the Local Plan should provide the flexibility for other locations within the borough that have suitable attributes to provide additional opportunities to accommodate similar space. These locations should ideally have strong public transport accessibility and close proximity to the CAZ as the central focus of office demand. Ultimately, over the Plan Period, as the borough becomes a more established office location as VNEB grows it may require further locations to provide additional capacity in a similar way to the City Fringe and Southbank have provided over-spill space for the City.

Question 22: Is the forecast pipeline of development sufficient to meet this aspect of the borough's office market over the plan period?

- 3.37 The evidence provided by the ELPS is somewhat limited in terms of its assessment of the prospective locations for office development over the plan period in that it only considers the characteristics of VNEB as an office hub, without reviewing other locations that potentially have the capacity and accessibility to deliver office space.
- 3.38 In focussing wholly on one area the ELPS and the subsequent Local Plan may meet the quantitative need for office provision but there could be a range of qualitative needs that are not met as true choice is not provided within the market, particularly given other locations can offer similar conditions for office growth.
- 3.39 In quantitative terms there may now be a significant missed opportunity given since the publication of the ELPS it has been announced that Apple will be locating their European Headquarters at Battersea Power Station. Not only does this remove a large amount of floorspace from the future pipeline it is also likely to act as a major catalyst for new demand similar to the impact Google's commitment has had at King's Cross.
- 3.40 Further, focussing on one location risks only provide one type of office space suited to the prime location VNEB will become. The regeneration of VNEB is displacing occupiers from good quality 'secondary' stock, who will be looking for alternate accommodation. This type of stock is also likely to be attractive to second tier suppliers to prime occupiers, again suggesting other well-connected locations could play an important role in the future.

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?

- 3.41 One of the areas listed in the context of this question (page 36) queries whether office floorspace sites near transport interchanges have the potential to contribute to the demand for local and sub-regional office floorspace. We refer to Policy 4.2 of the London Plan (2016) with respect of office floorspace locations and note that new office development should be located within viable locations with good public transport, enhancing the businesses environment.
- 3.42 The NPPF requires that Local Plans are consistent with other policies. We consider that policies should allow developers/landowners to bring forward a site for office development where they can demonstrate that office development is

complementary to the existing uses in the vicinity and good design principles have been used, this should be done on a site by site basis.

- 3.43 Taking into account the above and in response, Safestore consider that Ingate Place, given its proximity to Queenstown Road, is a suitable location for office development with potential to help meet demand for offices within the area. We would welcome further discussions with officers at the London Borough of Wandsworth on this matter.

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?

- 3.44 The former Bingo site has been vacant for a considerable period of time and we would suggest that policies requiring employment floorspace should be lifted from this site in its entirety in order to ensure that the site can come forward for redevelopment.

Question 27: Are there other areas, either surrounding these sites or elsewhere that should also be designated as Employment Intensification Areas?

- 3.45 Safestore consider the Council should explore sites which have an undersupply of floorspace in relation to demand, provide a less insensitive land use than that which could be provided and are well connected to public transport networks and close to core markets.
- 3.46 Sites should be evaluated on a site by site basis and tested against reasoned policies which facilitate the intensification of quantum of floorspace on each site. There is the opportunity at the former bingo hall to provide a comprehensive redevelopment with high density of employment and/or residential floorspace. In order to achieve this in a comprehensive manner, which would be more appropriate in design terms, it is recommended that the former bingo hall site is released from its designation so that the sites can be brought forward via a scheme which is complementary to the existing requirements.
- 3.47 In addition, Safestore consider that there is an opportunity to increase the quantum of employment floorspace at Ingate Place. Presently, the Safestore site at Ingate Place accommodates a significant quantum of floorspace used by SMEs. Safestore consider the Council should seek to promote employment intensification in Ingate Place in order to maximise potential in relation to job creation. It should be noted that Safestore consider that their site at Ingate Place should be reallocated from PIL to IBP so as to ensure that the employment space offer within the site can be maximised.
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Question 28: Should the MUFIEA designations in the adopted Local Plan be re-designated as Employment Intensification Areas?

- 3.48 The MUFIEA policies within the Local Plan are currently working well to produce sites which are meeting the objectives of the London Borough of Wandsworth. At present redevelopment on MUFIEA sites require the re-provision of employment floorspace equal to that previously established on the site and therefore development in MUFIEAs does not compromise the quantum of existing employment floorspace within Wandsworth.
- 3.49 Whilst Employment Intensification Areas may be suitable to be located in some of the existing MUFIEA locations, there needs to be a rationalised approach for the change which has been assessed against the need for employment floorspace and the suitability of the location. Re-designating MUFIEA in its entirety to Employment Intensification Areas without the necessary background work would not meet the policy tests set out within the NPPF. Allocating sites as Employment Intensification Areas requires further justification and evidence that the result of the allocation would be effective in delivering the objectives of the Local Plan.

Question 29: What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?

- 3.50 The existing policy for redevelopment within MUFIEA allows for mixed use development with an element of residential development and the re-provision of the same quantum of employment floorspace last used on the site. This promotes a mix of uses which allows both employment and residential uses to be optimised.
- 3.51 We suggest that Employment Intensification Areas could allow for similar circumstances where it can be demonstrated, on a site for site basis, that the quantum of uses has been optimised.

Question 34: Should 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?

- 3.52 Safestore Ltd support the use of area spatial strategies or site allocations. However, given the importance of these strategies Safestore Ltd would wish to be involved in any strategy that comes forward for the Bendon Valley area.

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?

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- 3.53 The Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and should enable the delivery of sustainable development. It should be noted that policies which specify requirements relating to rent levels, leasing and management of new employment premises may prejudice development given the lack of ability for these policies to be applied flexibly and reflect market conditions.

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?

- 3.54 There should be flexibility within planning policy for a developer/landowner to bring forward a site where they can demonstrate complementary uses and good design on a site by site basis. Local plans should be prepared positively and not be onerous or place restrictive requirements which could stifle investment and regeneration opportunities.
- 3.55 As set out in Para 173 of the NPPF ... *" Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"* . We therefore conclude that the proposals to increase the design and management restrictions of development should be resisted.

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 minimum percentage of market rent?

- 3.56 There are a number of ways of assessing affordability, one of which is market rent. Headline rent reduction is arbitrary and does not reflect what businesses can afford. There are a number of different workspace providers who provide various options to occupiers with regards to floorspace which suit their requirements. These include, inter alia, flexible leases which allow for upgrading and downgrading of quantum of office floorspace dependant on need, short term leases and various sizes of units (including single desk options).
- 3.57 We therefore consider that managed workspace is one potential method to provide affordable workspace but it is not the only method.

Question 48: Should Havelock Terrace area be designated as Industrial Business Park?

- 3.58 We agree that an IBP designation for Havelock Terrace would be more appropriate than a PIL designation. However, we suggest that the Employment and Land Premises Study has failed to fully understand the context of other sites within the Queenstown area and therefore the de-designation should not be limited to Havelock Terrace.
- 3.59 The Safestore Ingate Place site is currently occupied by the storage company as well as a business centre which is home to a range of small and medium sized businesses which generally operate in a manner more akin to an IBP designation rather than a PIL designation and we would welcome further engagement with LBW and its advisors so that a greater understanding of the area can be gained, and therefore an appropriate evidenced based policy designation can be proposed. In the event that both the west of Ingate Place and Havelock Terrace are to become IBPs then it would be an inconsistent application of policy for the Ingate Place Safestore site which lies between the two to remain a PIL designation. This would risk the potential for the site to maximise its contribution to the Wandsworth economy and ability for the site to be redeveloped and invested in.

Question 50: Should other parts of the SIL be re-designated as Industrial Business Park?

- 3.60 Please see response to Question 48 above relating to the Safestore Ingate Place site.

Question 51: Should the Local Plan allow residential uses in any part of the SIL?

- 3.61 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:
- local planning authorities should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

-
- o specific policies in this Framework indicate development should be restricted
- 3.62 Flexibility within the Local Plan should be promoted and therefore residential uses within a SIL could be allowed, if it can be demonstrated that the introduction of such a use would not harm the long-term success of the industrial area.
- 3.63 There should be flexibility for a developer/landowner to bring forward a site where they can demonstrate complementary uses and good design on a site by site basis. Requirements in the existing MUFIEA policy (Policy PL6) state residential development will be acceptable where:
- i. Net employment floorspace equivalent to at least existing employment space is provided. In particular flexible employment floorspace catering for small and medium sized enterprises will be sought.
 - ii. New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment area.
 - iii. Existing surrounding uses will not have an adverse impact on the amenity of new residential space.
- 3.64 We suggest that these criteria could be appropriately applied in SIL locations in the instance of residential use.

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?

- 3.65 The intensification of non-efficient employment sites is supported. One possible strategy for the improvement to the public realm in and around SIL's could be to release an element of PIL locations, which are generally for more 'dirty' businesses, to IBP. By releasing more land for IBP this would continue to ensure job creation and could incentivise investment for more light industrial or office uses which could generate infrastructure contributions to help improve the environment of that area. If landowners/developers can be incentivised with increased value of their sites,

each individual re-development opportunity would have the ability to improve public realm etc.

Question 53: Should the Local Plan continue to require full replacement provision of existing B1(c), B2 and B8 floorspace within the SIL?

- 3.66 As set out in response to Question 51, we suggest that flexibility in the Local Plan should be allowed for, subject to compliance with other design and environmental factors. There should be flexibility for a developer/landowner to bring forward a site where it can be demonstrated that complementary uses, good design and a viable development is achievable, on a site by site basis.

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?

- 3.67 Please see response to Question 53 above.

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?

- 3.68 Please see response to Question 53 above.

Question 57: Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?

- 3.69 Generally the criteria are broadly appropriate in order to demonstrate that there is no demand for employment floorspace. However, we consider that an 18 month marketing exercise is inappropriate. A reasonable period is one that reflects the average time a building of that type spends on the market. There should be a policy test to demonstrate that a reasonable marketing exercise has been carried out or evidence to demonstrate that there is no prospect of re-providing employment floorspace rather than a strict 18-month term.

Question 59: Should more specific and detailed information regarding the marketing requirements be set out alongside the policy?

- 3.70 Detailed information regarding the marketing requirements to be set out alongside the policy should be provided within the Local Plan. The Local Plan should set out a reasoned justification for each requirement within each policy.
- 3.71 In addition, clarity with respect of requirements for redevelopment applications would be welcomed by developers.
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Question 60: Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?

- 3.72 Local Plans are the delivery mechanism for securing sustainable development within the area in which the Plan relates. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. The NPPF seeks to proactively drive and support sustainable economic development to deliver the homes and business units that the country needs by encouraging the effective use of previously developed land and by promoting mixed use development (Para 17). To this end, restricting development on redundant sites would not meet this test.
- 3.73 It would not be appropriate to apply a blanket restriction on redundant employment premises as a clear explanation could not be provided. The consultation on the NPPF (held between 2015 and 2016) provided an indication with respect of the views of the Government of bringing sites into use which were redundant, unviable or underused. The amendments to Paragraph 22 of the NPPF are likely to require local authorities who wish to continue to protect employment use on redundant sites to provide up-to-date needs assessments. Paragraph 42 of the NPPG states that although there is no formal requirement for an annual update of employment site allocations, these should be reviewed regularly to ensure that appropriate consideration is given to trends in land values for commercial and employment uses, against land values for other uses including residential.

Question 61: Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?

- 3.74 As per the response to Question 60 above, we do not consider it appropriate or reasonable to place restrictions on alternative uses for office re-development in Focal Points, CAZ and Town Centres.

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?

- 3.75 Development Management Policies Document (DMPD), Policies DMI5, DMI6 and DMI7 should be reviewed within this partial review of the Local Plan. Whilst it is acknowledged that the London Borough of Wandsworth is intending to review the waste management policies following the forthcoming review of the London Plan, we consider that undertaking a review of the waste management policies in conjunction with a review of the employment and industry policy options is appropriate.
- 3.76 Paragraph 182 of the NPPF requires Local Plans to be positively prepared and effective throughout the duration of the plan period. We consider that neglecting to review policies DMI5, DMI6 and DMI7 do not comply with these requirements as the

current policies do not take into account the up to date evidence provided within the Employment Land Review.

- 3.77 In addition, Paragraph 158 of the NPPF states that each Local Planning Authority should ensure that its Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should therefore review their requirements (for housing and employment land) with up to date evidence as to take into account relevant market and economic signals.
- 3.78 Policy PL7 states that the strategic reservoir for industry and waste will comprise the Queenstown Road, Battersea SIL supported by a number of Locally Significant Industrial Areas in the Wandle Valley. The purpose of current review is the provision of employment and industrial land within the borough, including SILs and LSIAs, given that this encapsulates the location of the existing waste sites and proposed waste sites it would be inefficient to not include a review and these policies should be informed by up to date research in the form of the Employment Land Review.

Question 66: Do the policy options set out in the sections above accurately reflect the evidence base?

- 3.79 The policy options do reflect the evidence base that has been prepared to inform its development, however the more important consideration is whether the evidence base appropriately considers the demand and supply options. Clearly if there are issues with the evidence base, regardless of whether the policy directly reflects it, the policy itself will be unsound.
- 3.80 As set out in the supporting research to this paper there are a number of concerns with how the evidence base understands the nature of the offer within each of the borough's employment sites and therefore the recommendations it makes for each. There also appears to be (based on the fundamental mis-understanding of each places' offer) an inconsistent approach to how similar locations are treated within the ELPS.
- 3.81 The key limitation of the policy options relates to how different parts of the Queenstown Road SIL are dealt with and the policy direction for re-designating some elements as IBP whilst others with similar characteristics remain as PIL. In treating areas with the same offer and characteristics in materially different ways the evidence base does not provide a sound platform upon which to base policy and leaves the policy open to challenge in the future.
- 3.82 The policy options should seek to provide clarity and certainty to landowners and developers in order to establish a sound platform for future growth. However by

aligning with the evidence base, and therefore carrying forward its mistakes, the policy options may create uncertainty rather than a clear direction for the borough.

Question 67: Are there any alternative pieces of evidence or information that the Local Plan review should take into consideration at this stage?

- 3.83 The Local Plan review should take into consideration at this stage the representations made during this consultation. In addition, as per paragraph 160 of the NPPF, we would recommend that the London Borough of Wandsworth engages with employment floorspace landlords and tenants in order ensure that the evidence base used in the formulation of the policies with respect of employment and industrial floorspace is representative of the existing market.

4. Summary/Conclusion

- 4.1 Safestore Ltd welcomed the employment and industry review and has provided the above response in order to ensure that they can engage with London Borough of Wandsworth throughout this important exercise. We invite LBW and its advisors to visit the various Safestore sites, particularly Ingate Place, to ensure that the proposed policies are based on the most up to date evidence base.



Report

Appendix 1



Safestore Ltd – Ingate Place

Review of LB Wandsworth Employment Land Evidence Base

1. Introduction

- 1.1 Safestore Ltd own and operate a number of self-storage facilities across the UK and have a significant presence within London where they provide storage space for a range of London residents and businesses. They have three sites within LB Wandsworth lying within existing employment land designations.
- 1.2 The larger of the three sites is Ingate Place, from which Safestore own and operate a self-storage facility and a small business centre. In line with their wider business objectives Safestore are considering how best to reinvest in the Ingate Place site in the future. The core of the reinvestment will focus on upgrading the quality of the storage offer; however they also recognise the potential to build on the site's wider offer to accommodate a greater range of employment generating space within the site.
- 1.3 It is clear that, given the age and nature of the built stock, major reinvestment is needed at Ingate Place within the early part of the plan period to enable both the self-storage and small business offer to continue. Key to realising the full potential of the Ingate Place site, and unlocking this investment by Safestore Ltd, will be the establishment of a positive and supportive planning policy designation for the site which allows the storage activity to continue but also creates and positively promotes new opportunities.
- 1.4 Within this review we consider the current policy position and changes proposed to it within the Employment and Industry Review Policy Options Document to understand its robustness in respect of its treatment of the Safestore site at Ingate Place. It also considers the evidence the Document is founded upon to ensure that, in line with the NPPF, it provides a sound and robust understanding on which policy decisions can be based.

2. Ingate Place

- 2.1 Ingate Place, is located within the north east of the London Borough of Wandsworth. It lies within the Queenstown Road Preferred Industrial Location and forms part of the wider Stewarts Road industrial

and employment area. Critically the site benefits from close proximity to Queenstown Road station and lies within the western edge of the Vauxhall Nine Elms Battersea Opportunity Area, within 750m of both Battersea Power Station and New Covent Garden Market.

2.2 The Ingate Place site has historically accommodated a range of employment generating, largely industrial uses. Activities have evolved alongside the London economy, transitioning from major manufacturing and rail related activity to a more recent mix of small businesses providing a wide range of services and products. It currently provides a mix of self-storage space and a managed small business centre (the Spaces Business Centre) that accommodates a number of small and medium sized enterprises (SMEs).

2.3 The self-storage activity is located to the south of the site within a 5 floor Victorian factory building and a more modern extension. To the north lies a two storey series of buildings which form the Spaces Business Centre. These buildings are sub-divided into a series of light industrial, workshop and office units that accommodate a range of small businesses. Some businesses also occupy the railway arches to the east of the site.

2.4 Despite the industrial appearance of the built stock the occupying businesses are drawn from a wide range of sectors and activities. Drawing on data provided by the Spaces Business Centre manager in late 2015 there are c.100 individual business units of a range of sizes, at the time of the 2015 survey occupancy was in excess of 90%. This level of demand suggests there is a clear need for the type of space provided within this part of Wandsworth and that the offer is clearly successful.

2.5 This success is founded upon the breadth of activity that the centre attracts which, to a large degree, is also driven by its location and ability to service central London activities and markets as well as the wider south and south west of London. The Spaces Business Centre accommodates a range of uses that fall within 'industrial' and 'non-industrial' use classes as defined within the London Plan which would usually occupy within space within the B1 uses classes – either office (B1a) or light industrial (B1c) space.

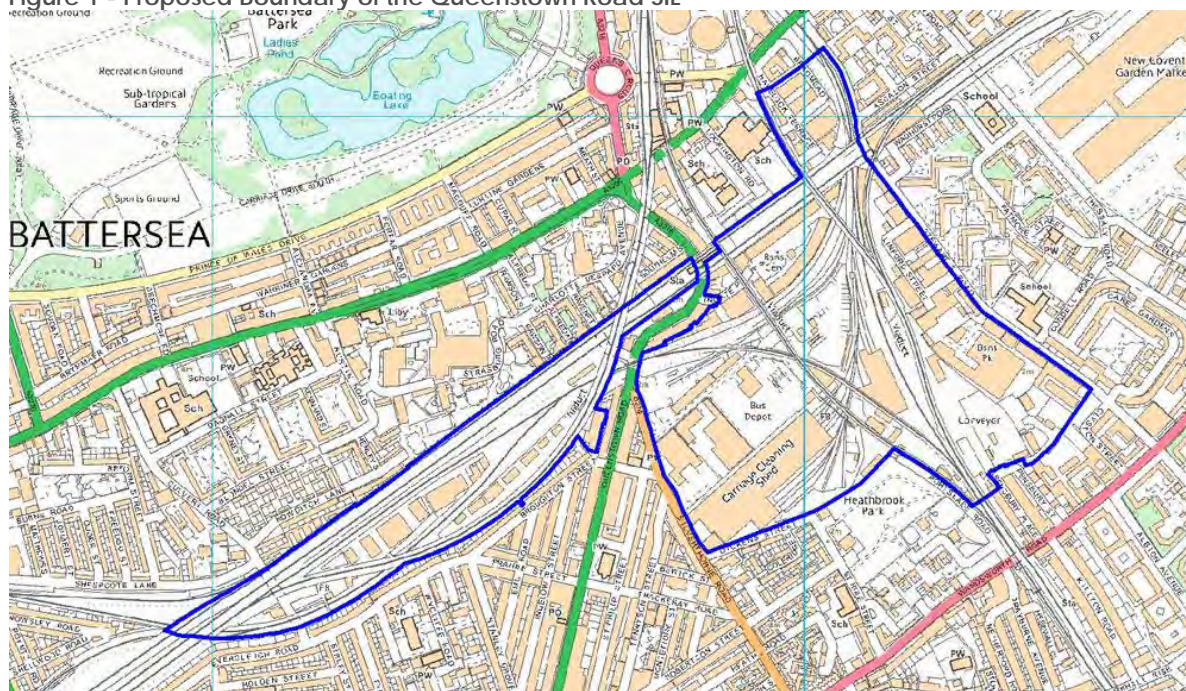
3. The Proposed Allocation of Ingate Place

3.1 Within this section we consider the proposed designation of the Queenstown Road area, and hence Ingate Place itself, within proposed policy and how this proposed approach is supported by the Council's evidence base. It also considers the accuracy and robustness of that evidence base in direct relation to its understanding and treatment of the Safestore site at Ingate Place.

The Employment and Industry Review Policy Options Document

- 3.2 The Employment and Industry Review Policy Options Document (EIRPOD, October 2015) provides the strategic direction for employment land policy within the Wandsworth Local Plan. It sets out the proposed designations for each employment site (both existing and proposed) which, in turn, places restrictions on the future uses that can be provided for within the Ingate Place site.
- 3.3 The EIRPOD provides specific consideration of the Queenstown Road SIL designation, it considers that the SIL is “considered to function well as a key area of industrial, warehousing and office employment land” (Para 8.23, Pg 18). Based on this it proposes to retain the whole area shown in Figure 3-1 below as a Strategic Industrial Location given the “relative success of the SIL as an industrial area” (Para 8.24, Pg 19).

Figure 1 - Proposed Boundary of the Queenstown Road SIL



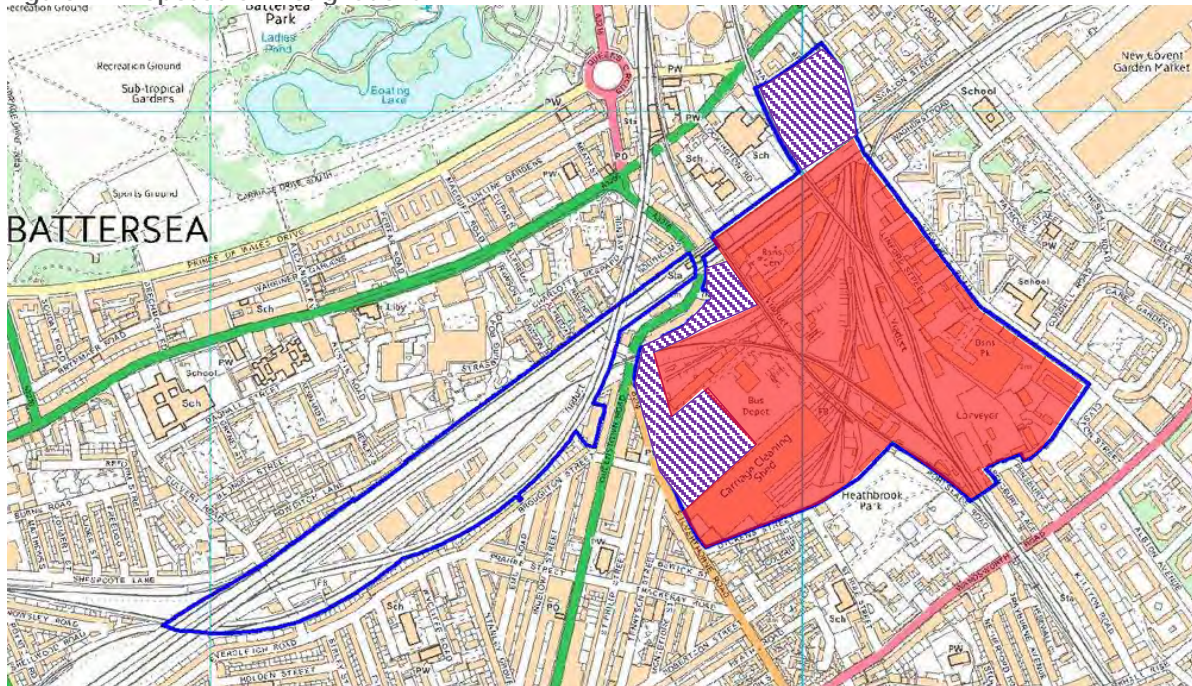
Source: LB Wandsworth, 2016

- 3.4 In line with the existing Local Plan, Site Specific Allocations Document and the Vauxhall Nine Elms Battersea OAPF the EIRPOD recommends retaining the majority of the Queenstown Road area as PIL, save for the existing Industrial Business Park (IBP) designation at the west of Ingate Place and around Silverthorne Road (where Battersea Studios is located). It also recommends the allocation of a new area of IBP to the north east of the SIL along Havelock Terrace.
- 3.5 This re-designation is recommended on the grounds that there will be a significant level of change in the areas around Havelock Terrace which could lead to new opportunities to increase employment

density, particularly given the “increased connectivity that will be provided by the Northern Line extension” (Para 8.86, Pg 49). The PIL designation would restrict new development to B2 and B8 activities; however the re-designation of the Havelock Terrace area is intended to allow scope for new B1a and B1b businesses into the existing area alongside retained industrial activity.

3.6 Although not shown within the EIRPOD, based on our understanding of the current and proposed IBP designations the revised SIL would be designated as follows:

Figure 2 - Proposed SIL Designations



Source: LB Wandsworth, 2016

3.7 As shown in Figure 2 the red shaded area would be retained as PIL whilst the two hatched areas would be classified as IBP, the functionally separate area to west would also be retained as PIL. The two IBPs would exist both to maximise the opportunities to deliver more intensive employment activity and also to provide a buffer the heavy industry in the core of the SIL and the residential neighbourhoods around its periphery. Both areas are also considered to be suitable to IBP designations given the nature of activity that already exists within them, which is much more mixed than the PIL designation would suggest.

3.8 The PIL is to be retained given its current (and assumed future) scale and nature of uses and their ongoing importance to the wider functioning of Central London as a location for waste processing, aggregates supply, transport maintenance and construction supplies in particular.

- 3.9 In considering the Ingate Place site in light of these designation definitions and the rationale for their application within the SIL it would appear incongruous to retain the PIL designation rather than extend the IBP across the whole northern section of the SIL. Ingate Place provides a similar mix of space and accommodates a similar range of activities to Silverthorne Road and Havelock Terrace (indeed anecdotal evidence suggests businesses have moved between them) and also benefits from similar levels of accessibility to both IBPs given the proximity to Queenstown Road station.
- 3.10 It is also important to consider the functionality of the sites once the designations are in place. The designation of the western part of Ingate Place as part of the IBP would potentially impinge on industrial activity achievable within the Safestore site given access would need to be through the centre of the IBP. This would also affect the quality of the IBP environment and its ability to attract higher density, higher value activities.
- 3.11 Ingate Place does not share similar characteristics to the PIL in terms of its scale or accessibility for HGVs. The main access route into the site (via Ingate Place itself) is small and, as such, will limit the site's ability to accommodate PIL type uses in the future. This accessibility challenge is likely to be further exacerbated by an increase in residential activity at the junction of Ingate Place and Queenstown Road through the planned change of use of 220 Queenstown Road.
- 3.12 Overall the proposed policy position is likely to place the Safestore site at Ingate Place in a difficult position, unable to fulfil the demands of a PIL location but also unable to unlock the sites full potential and deliver higher value higher density employment of the type increasingly clustering within the site.

LB Wandsworth Employment Land and Premises Study

- 3.13 The EIRPOD is based predominantly on the evidence provided by the Employment Land and Premises Study (ELPS) prepared on behalf of the Council by Aecom in August 2016 in line with guidance provided by the NPPF and NPPG. The purpose of the ELPS is to consider the nature of the current employment floorspace within the borough, provide a projection of future floorspace requirements and identify the premises and land requirements to meet these.
- 3.14 In general the ELPS provides a sound basis from which the borough can develop its employment land strategy through the local plan in terms of the projections of future growth and the types of space needed to accommodate these. However, a key misunderstanding of the Queenstown Road area and the nuances of its offer and types of business activity mean that there is a risk inappropriate policy responses are being considered. Within this section of this Review we seek to

help to address some of these mis-understandings in order to enable better informed decisions to be made.

- 3.15 We also seek to provide this information in order for a greater level of consistency to be applied across the LB Wandsworth employment land portfolio something which, given the fundamental misunderstandings, the ELPS fails to do.

The ELPS Understanding of Queenstown Road

- 3.16 The ELPS divides the employment land provision across the borough into a number of employment clusters; these contain either one or a number of individual sites and have been established based on both geographic proximity of individual sites and a shared character/nature of activity/built form. The ELPS has identified 30 clusters for which the Aecom team undertook qualitative site surveys.
- 3.17 The Safestore site at Ingate Place lies within Cluster C1 in the ELPS, which encompasses the whole of the Stewarts Road SIL area to the east of Queenstown Road and is consistent with the proposed policy designation in the EIRPOD. The over-arching assessment of Cluster C1 suggests that the survey recorded a total area of 31ha which accommodated a mix of employment activities within the office (B1a/b), industrial (B1c/B2), warehouse (B8), retail (A1) and sui generis use classes (ELPS Table 4-2, Pg34).
- 3.18 The summary analysis of Cluster C1 provides an incredibly high level review of a large and complex area, considering mainly issues of accessibility and ‘bad neighbour’ relationships. It fails to identify particular sub-areas of activity or where conditions may suit or support different types of activity, no detailed site survey information is included as an appendix so it is impossible to tell where certain conditions are prevalent.
- 3.19 It appears that it is a result of this high level assessment that the complexity of the area is not fully understood or captured within the ELPS, this mainly appears to be a result of the assessment focussing on the physical nature of the area and the types of buildings rather than the nature of businesses occupying them. This sets the tone for a series of inaccurate conclusions that are drawn for Cluster C1 later in the report, which in turn lead to policy recommendations that do not reflect the actual activity within the area or address their future needs.
- 3.20 The ELPS considers the premises types and sectors noted during the survey in more detail in section 4.7 of the report (pages 53-57) and sets out that within Cluster C1 that there are “*a considerable number of SMEs within the Stewarts Road area for example, on Ingate Place and Havelock Terrace, including businesses offering: catering equipment hire; commercial cleaning services; event floristry; and signage and laminating*” (ELPS para 4.7.7 pg 56). Whilst the analysis correctly recognises the

locational focus and importance of SMEs within the north of Cluster 1 it fails to truly grasp the full range of activities undertaken within the areas it mentions. This lack of detailed understanding is further highlighted in paragraph 5.3.9 (page 76) when the ELPS considers storage activity and appears to consider the whole of the Safestore site as being used for self-storage.

3.21 A more detailed survey of the Ingate place sub-area within Cluster C1 would have revealed a much richer mix of business activity than the ELPS identifies. Based on the Centre's occupier list our understanding of the businesses within the site suggests that the majority of the business activity is not orientated towards self-storage or lower value' distribution or service activities as suggested in the ELPS.

3.22 Indeed there are a range of small production and assembly activities that provide much higher value economic activity and employment. For example occupiers operate within the fashion industry and focus on high value 'designer' and bespoke garments targeted at London's most prestigious retail outlets. Technology businesses service the film and entertainment industry across the world producing 'models' or supply niche electrical equipment to major events and studios.

3.23 Whilst these may reflect 'new sectors' in the area and reflect the business centre occupier bases evolution to reflect the new creative and productive economy of London, it is worth noting that this is not necessarily a new phenomenon for Ingate Place. The centre's longest serving occupier has been at the site for circa 20 years and continues to provide high end restoration services for antique furniture. This activity is not unique within the site, others provide similar or more specialised services restoring a range of furniture and art works. Again these are highly skilled and value activities that require a very different environment to that provided within the majority of the SIL to the south.

Alignment of Site Analysis and Policy Recommendations

3.24 The high level assessment fails to fully recognise that, effectively, there two character areas within the cluster: a mixed office/workshop/light industrial area to the north and a heavy industry/waste/infrastructure to the south. These have very different occupier types that, in turn, required different property, public realm and accessibility conditions to succeed and also have very different relationships to neighbouring activities.

3.25 Critically, and what is not fully considered in the analysis of the Cluster, the different characters are also driven by the ability of these areas to accommodate different types of uses both now and in the future. Therefore, the ELPS assessment of Cluster C1 doesn't provide a fully consideration of whether the characteristics of the north of the SIL would be able to meet the needs of PIL-type occupiers.

- 3.26 Whilst not clearly addressing this issue it is implicit in the ELPS own analysis (para 4.3.2, pg 35) that some parts of the Cluster are not likely to be suitable for PIL-type uses given there are “*some issues with permeability and traffic flow restrictions*” and HGVs and the “*high volumes of traffic make the cluster somewhat difficult to navigate*” suggesting that the Cluster may not be wholly suitable for PIL-type activity.
- 3.27 In line with the EIRPOD, the ELPS considers that Cluster 1 “*function[s] well as a key area of industrial, warehousing, and office employment*” (ELPS para 4.3.2, pg 35) again providing the implicit suggestion that the future of the Cluster should be to accommodate mixed employment without providing clear guidance on which locations provide the appropriate character for what uses.
- 3.28 The full challenges of the Cluster and the potential limitations as a major industrial location are further highlighted in Table 4.8 (page 48), highlighting the quality of the public transport accessibility (considered good), the nature of the strategic road access (considered to be indirect) the lack of development capacity and the high proportion of SME/Creative activity. These all reinforce the notion that within Cluster 1 there are challenges to delivering major industrial activity in at least parts of the large area it covers.
- 3.29 Despite this (albeit implicit) recommendation, no further detailed analysis is provided before the ELPS considers the opportunities for intensification within the Clusters. Within C1 it estimates that there is the opportunity for intensified activity within the 1.7ha area covered by Havelock Terrace based on its improved public transport accessibility and the wider retail and leisure uses it will benefit from.
- 3.30 It is not to be argued that these attributes will indeed provide the opportunity for intensification, however it is highly unlikely that Havelock Terrace is the only location in Cluster C1 that will benefit from these same influences, or already has a very similar context. The same justification was provided through the SSAD to designate an IBP to the west of the Cluster suggesting areas to the west also benefit from this context.
- 3.31 It is therefore unclear why the Safestore site is not considered in the same vein, given it accommodates a significant scale of SME activity, adjoins an existing IBP, benefits from the same public transport access as the rest of Ingate Place and is ultimately constrained by the existing IBP and the nature of activity already in the site.
- 3.32 However, this assessment does not seem to fully translate into the policy recommendations made later in the ELPS. Despite recognition early in the ELPS that Cluster C1 accommodated SME activity across a broad range of non-industrial sectors the final chapter focuses solely on the accommodation of a “*range of small and medium sized industrial and warehousing occupiers*” and

suggests that the “existing SIL and LSIAs remain the most suitable locations in Wandsworth for accommodating this industrial and warehousing demand” (para 8.2.18, pg 105). Whilst this is not arguable in principle it is clearly untrue that this is correct for all parts of the current SIL designation in Custer 1.

- 3.33 This blanket consideration of business activity is carried through into Recommendation R4 (page 109) which directs that the Council to retain the SIL in its current designation with the exception of Havelock Terrace given its relatively high PTAL. It is our belief that, given the basic misunderstanding of how Cluster C1 functions, this recommendation is not robust and, therefore, any policy based on it will not be robust either. The recommendation should treat all sites equally and consider all locations within the Cluster with similar characteristics and provide an appropriate policy response to each, rather than a ‘blanket’ approach to all but one sub-area.
- 3.34 In order to make the policy basis sound Recommendation R5 (page 111) should be expanded to set out a criteria based approach to identifying which parts of the SIL offer the appropriate attributes to be redesignated as IBP. The key considerations set out for Havelock Terrace (public transport accessibility, separation from heavy industrial use, provision of wider amenity in neighbouring sites, presence of non-industrial businesses) apply equally to the part of Silverthorne Road and Ingate Place that is already IBP and the Safestore site itself, which will be left as the only site in the cluster with those characteristics that isn’t IBP.

Identification and Recommendations Related to SME Space

- 3.35 The fundamental mis-understanding of the Safestore site at Ingate Place is also reflected in the specific analysis the ELPS provides on the provision of SME space across the borough. Despite recognising the Cluster 1 provides a good mix of SME activity and floorspace provision no sites within it are included in the ELPS list of key SME locations other than Battersea Studios (Table 4.10, Pg 54).
- 3.36 Indeed, despite the preceding paragraph (4.7.6. pg 53) highlighting that a range of small creative and other businesses are locating in converted industrial and warehouse premises neither the Spaces Business Centre or the SME space operated by the Workspace Group (such as Avro House) at Havelock Terrace are identified specifically despite these sites demonstrating exactly the characteristics the ELPS is suggesting are vital to support the borough’s SME and creative economy.
- 3.37 Paragraph 4.7.6 also recognises the increasing threat these spaces are under from conversion to residential activity and in paragraph 4.7.13 highlights the role light industrial and warehousing land is playing in meeting these sector needs. However it does recognise that these places (especially with a SIL-IBP designation) have greater protection from change of use than town centres. If this were to

be recognised by the evidence base, alongside a more thorough understanding of where this provision exists and activity is already being accommodated, a different policy approach would become evident.

3.38 This approach would draw a much closer line between activity at a sub-cluster level, the specific attributes of a site, its existing activity and the scope to enhance this activity based on those factors. In doing so, using the evidence already prepared in a more coordinated way would suggest that the policy for the existing IBP, the Safestore site at Ingate Place and Havelock Terrace should be the same.

3.39 With a more detailed understanding of each location it would become self-evident that they have a shared set of characteristics that makes them more similar to each other than the rest of Cluster 1, where larger, heavy industrial activity is dominant.

4. Conclusion

4.1 Overall the main direction of both the EIRPOD and the ELPS is correct and fully supported as a mechanism for allowing the borough to protect and grow the diverse economy it already accommodates. It is recognised that sites need to be protect for a range of industrial and non-industrial uses.

4.2 However, it needs to be recognised that, in some areas, the baseline analysis within the ELPS is deficient and, when carried through the Study leads to a range of recommendations that are inconsistent either with the base data, the reality of activity 'on the ground' or in the way sites are dealt with. Unfortunately, in turn, these basic misinterpretations have led to a proposed policy direction within the EIRPOD that cannot fully be supported as the evidence upon which it is based is flawed.

4.3 It is our contention that with a more detailed understanding of the Safestore site at Ingate Place the deficiencies in the current evidence base become self-evident and that this new understanding would facilitate a more robust and defensible policy within the Local Plan as it would allow all sites within the Queenstown Road SIL to be considered on their merits on an equal basis and allow a consistent approach to be adopted on sites which can clearly demonstrate the same characteristics.

4.4 It is clear that, if both the west of Ingate Place and Havelock Terrace are to become IBPs then it would be an inconsistent application of policy for the Safestore site which lies between the two to remain a PIL designation. This would not only risk the potential for the site to maximise its contribution

to the Wandsworth economy, it would also risk its ability to be redeveloped and invested in meaning, over time, even the existing activities would be lost. As PIL there would be no scope to develop the site to meet the prevailing demand in the area yet the site would have such constrained access to be able to provide the environment suitable for true industrial activity.

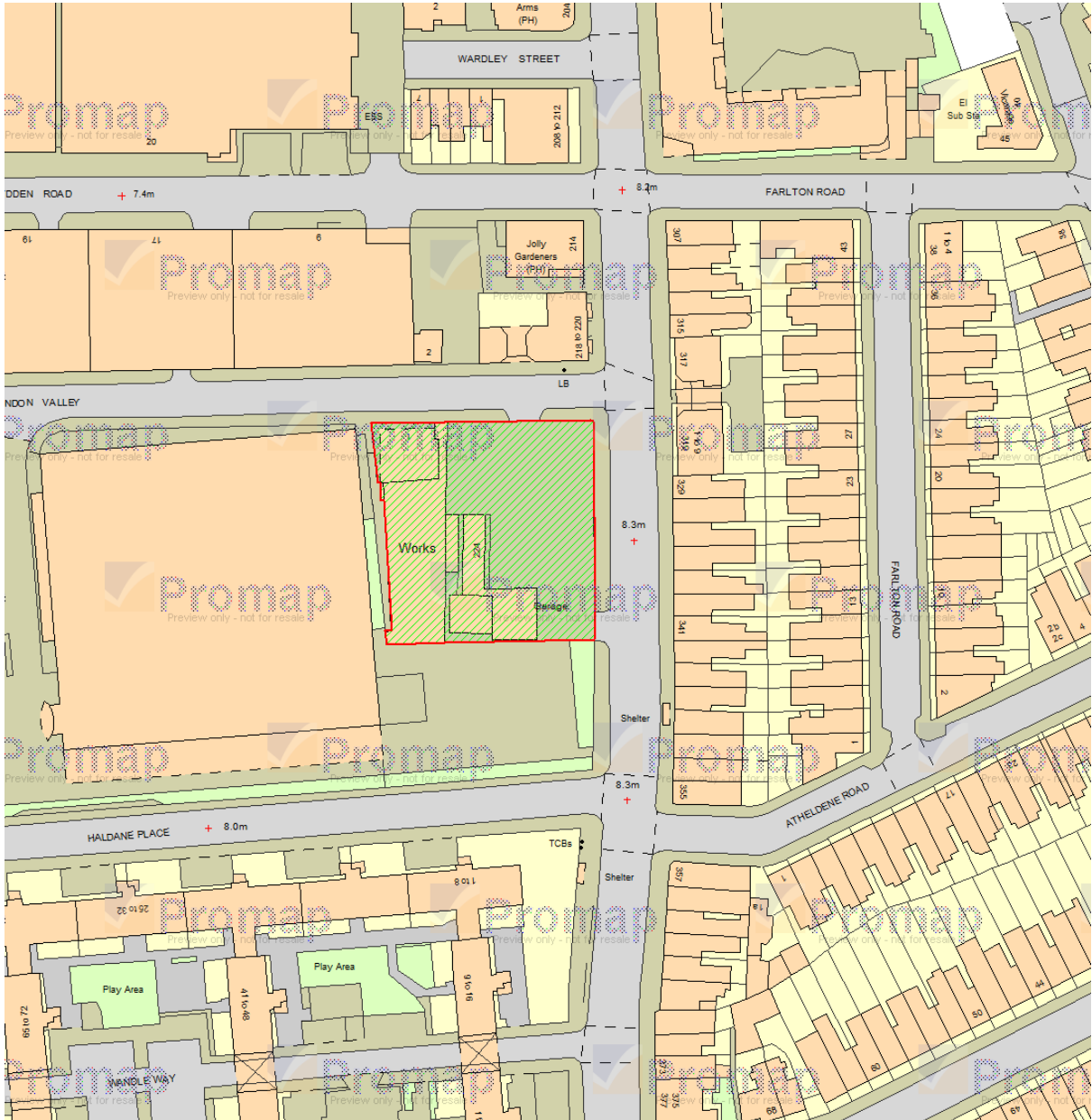
- 4.5 The Partial Review of the Local Plan provides an opportunity to set a positive direction for the Queenstown Road SIL, capitalising on its varied attributes to continue to provide much need true industrial capacity whilst also allowing other activities to be accommodated in a way that reinforces the employment offer and doesn't diminish the wider PIL trading environment.



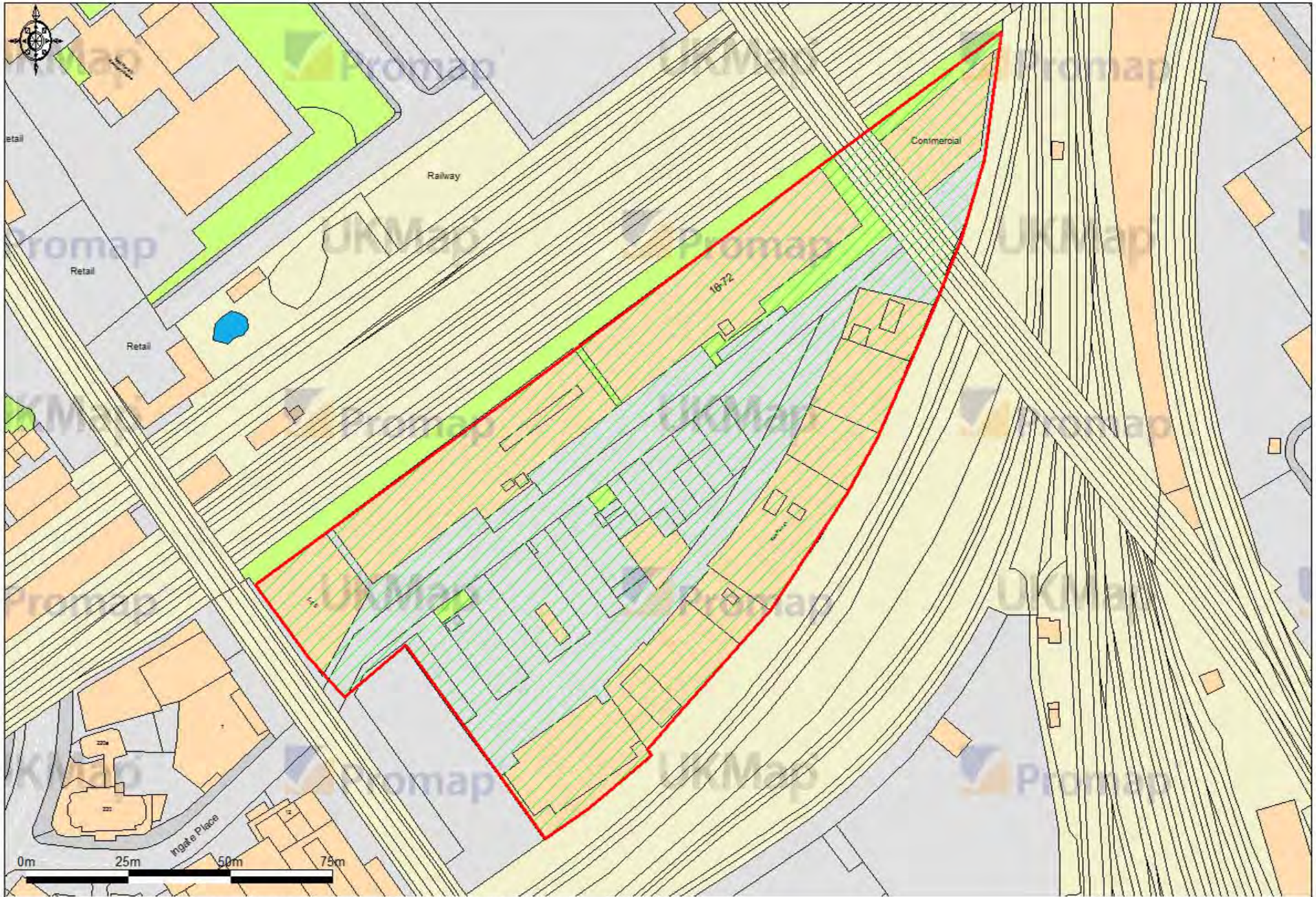
Report

Appendix 2

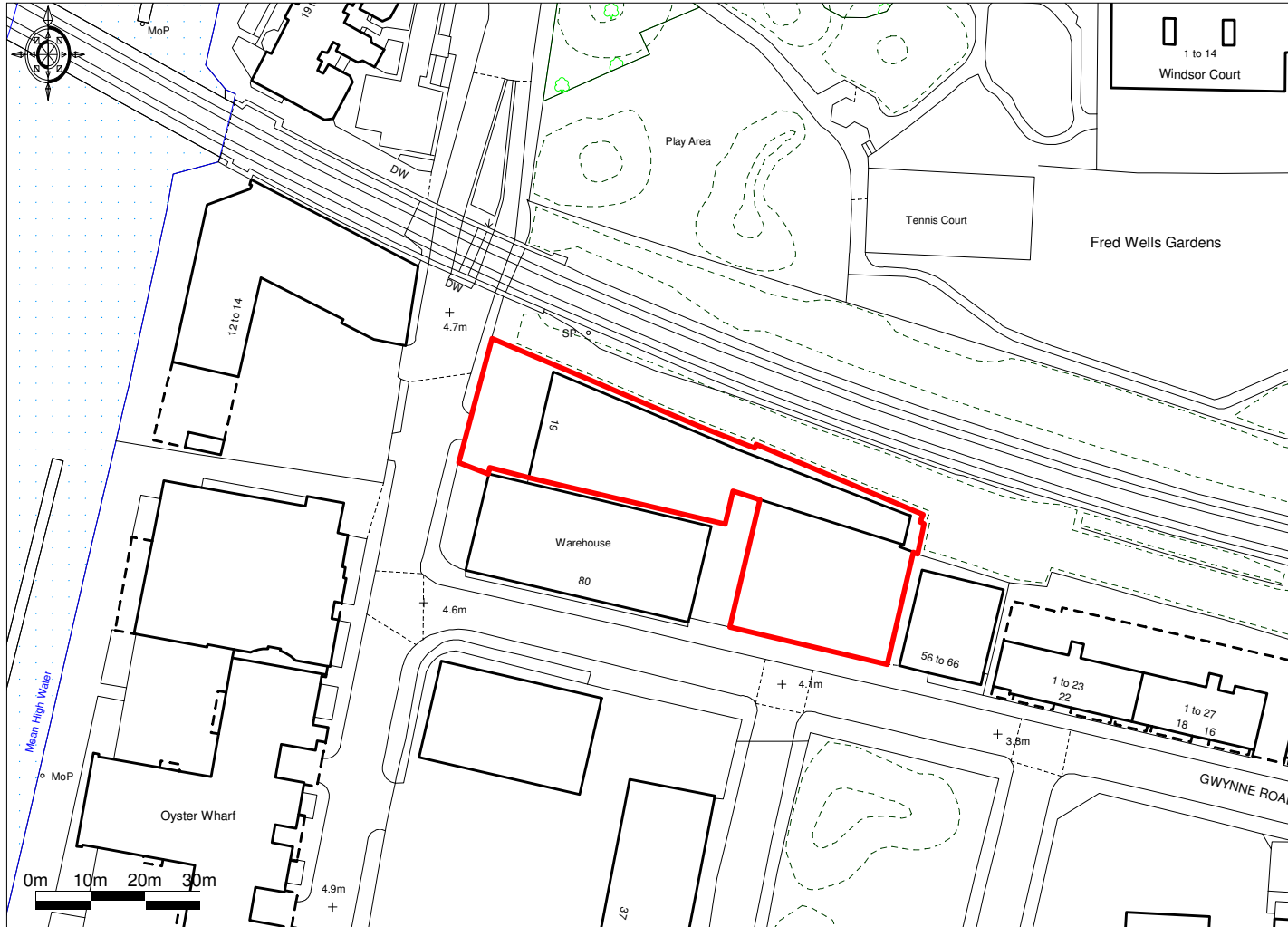
Safestore Garratt Lane



Safestore Ingate Place



Safestore Battersea Lombard Road



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4 November 2016

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

Dear Sir/Madam

Employment and Industry Review (options stage) – response to consultation

We are writing on behalf of our client, Schroders Real Estate Investment Management (Schroders), to respond to the London Borough of Wandsworth (LBW) Local Plan: Employment and Industry Review options consultation.

We understand that the Council is producing a new Local Plan document covering employment premises and industrial land. The new document will form part of the Local Plan setting out relevant planning policies and allocating sites. It will replace the employment and industrial land policies in the existing Local Plan.

Background

Schroders purchased the Battersea Studios Site (the site), Silverthorne Road, in early 2014. It has since fully let all the vacant business units to a range of occupiers including small, medium sized companies and start-ups. The site is thriving and Schroders considers it to be an important part of its long term investment portfolio. For this reason Schroders has identified ways to improve the attractiveness of the location such as through providing new food and beverage outlets in shipping containers on site and through its recent planning application for improved entrance and landscape works.

Schroders is also considering opportunities for future development at and around the site including the potential to redevelop the Battersea Studios 1 building. Schroders is also considering how it can get involved in wider development and improvements in the Queenstown Road Industrial Business Park (IBP), such as to increase the amount of commercial space, improve the attractiveness of this 'buffer zone' and promote the area as a mixed use area for the creative sectors.

Schroders welcomes the opportunity to respond to the consultation of the Wandsworth Local Plan: Employment and Industry Review options consultation paper in the context of its future aspirations for the Battersea Studios site and the surrounding area.

In summary, Schroders considers that the IBP presents an excellent opportunity for promoting a flexible approach to high quality, high density employment premises sitting alongside complementary uses which might include some form of residential uses. Schroders also promotes an extension to the IBP to provide an effective buffer along the length of the SIL boundary. This approach aligns with the aspirations set out by the Mayor of London in his recently published 'A City for all Londoners' document in which he states 'we need

to be creative in how we think about space and promote mixed-use activity’.

We set out Schroder’s detailed responses to key questions below.

Questions from the Employment and Industry Review (options stage)

Question 1: Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

We understand that LBW is forecasting three alternative growth scenarios based on forecasts for growth and contraction in office and industrial jobs in the Borough and wider region (office floorspace is based on provision of premises for the local and sub-regional office market).

Schroders considers that the economic growth and regeneration activities in the borough should be supported through intensification of existing uses, high density mixed use development, improvements to access and upgrading the quality of land. It is considered that this will position the borough well to capture demand for office and employment uses, in particular flexible floorspace which would be suitable for start-up business and SMEs.

With this in mind, and the changing nature of employment forecast in the Borough (as set out in paragraph 8.6 of the Options document), Schroders suggests the Council considers the ‘central growth scenario’ for industrial land and ‘high growth scenario’ for office floorspace in the Local Plan. Sites such as Battersea Studios are seeing increasing demand for flexible office accommodation for use by creative industries and promoting a high growth scenario will encourage intensification of sites such as these to meet demand.

Question 2: What impact would the decision to leave the EU have on the preferred growth scenario?

Given that the long-term impact of Brexit on the wider economy is still unclear, Schroders suggests that the Local Plan aspirations should remain flexible. It will be important to preserve the Borough’s attractiveness to businesses with a local and sub-regional reach, such as creative and cultural occupiers. Paragraph 4.7.2 of LBW Employment Land and Premises Study (2016) states that *‘start up and small businesses provide an important source of economic growth and prosperity’*.

Schroders therefore suggests that activities and growth are adequately supported in the Local Plan and that growth in LBW is focused on meeting local and sub-regional demand to minimise the impact of Brexit. The IBP will play an important role in meeting this demand with workspaces aimed at local and small medium sized businesses.

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 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?

Schroders is aware that the Council currently protects and promotes light industrial, general industry and storage and distribution within SILs, through Policy DM11 ‘Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA)’. It understands the importance of protecting industrial land in the borough.

Schroders understands that historically the Stewarts Road Industrial Area has continued to be protected as SIL and is proposed to see an intensification of employment uses as a result of the reallocation of the Nine

Elms industrial areas. The area was meant to form the focus for accommodating businesses which are particularly reliant on proximity to the Central Activities Zone.

The LBW Employment Land and Premises Study (ELPS) (2016) takes the approach of assessing the various employment clusters which include the Stewarts Road area (Area C1) in which Battersea Studios is located and Stewarts Road – Culvert Place and London Stone Business Park (Area C2), both of which make up the Queenstown SIL

The 2010 Stewarts Road Study proposed re-designating the edge of the SIL, where Battersea Studios is located, as an Industrial Business Park (IBP). This would support the demand for uses that require high quality surroundings (as set out in paragraph 8.83 of the Options document), and create a transition buffer zone between the Park Town residential area and the heavier industrial and transport uses in the SIL. The LBW Development Management Policies Document (2016) sets out that IBPs require less heavy goods traffic and are *“able to relate more harmoniously with neighbouring uses than those in the Preferred Industrial Locations”*. The Queenstown Road IBP is shown as the purple area on the plan below from the Site Specific Allocations Document (2016).



Area Spatial Strategy - Nine Elms South

Since the designation of the IBP, Schrodgers’ management of Battersea Studios has demonstrated how the IBP can provide a valuable role as a hub for creative industries.

Schrodgers notes that the ELPS study is forecasting a change in job type (paragraph 8.2.3); identifying growth in typical office employment and a retraction in industrial sector jobs.

Schrodgers considers that the IBP will be important in meeting demand for office floorspace in the Borough in the Plan period. However, parts of the IBP do not yet improve the quality of the SIL environment nor function well as a buffer between the heavier uses in the SIL beyond and the neighbouring residential uses.

In this context, Schrodgers considers that the Council should adopt a more active role in seeking to improve the IBP’s role as a buffer zone. It also proposes that the IBP should be extended along the SIL boundary (encompassing Ingate Place and Havelock Terrace). An extended IBP would create a more effective buffer

zone and encourage a higher quality environment in this transition zone to the SIL behind. Schroders also considers the Council should encourage innovative approaches to mixes of uses, encouraging SME business growth and could contribute to local housing supply through new models of housing such as co-living build to rent.

The remaining Queenstown Road SIL continues to function well as industrial land so its designation should remain in place.

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?

Schroders considers that intensification of industrial land when supported by alternative uses and higher density development could help meet wider strategic growth objectives for the borough and mitigate the loss of industrial land. There are examples of high quality mixed use developments in London where employment and light industry can sit comfortably side by side with other uses such as residential.

As set out earlier the Mayor of London is promoting mixed use development, suggesting that industrial land and residential land could co-exist to help accommodate London's growth. The NPPF core planning principles promote 'mixed use developments and encourage multiple benefits from the use of land in urban areas'. Therefore, promoting mixed use and high density development in locations such as the IBP will help meet the strategic objectives of the LBW Plan and also address other demands on the Borough such as delivery of housing.

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?

Battersea Studios is an excellent example of where a creative workspace cluster has formed through the provision of SME workspaces. Schroders considers that opportunities to promote creative workspace should be focused at locations which will support clusters that thrive off proximity to others in the same sector.

It may not be appropriate to promote this type of creative workspace in every large scale employment development. Instead, the type of workspace provided should be tailored to the location proposed.

Schroders recognises the need to promote affordable creative workspaces in the Local Plan but that this should be based on the viability of individual schemes and the demand for accommodation in a particular area.

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?

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?

The benefits of managed workspace have been highlighted in the ELPS, which states that managed workspaces 'generally aim to provide workspace for small and micro businesses, often with some element of

business development or support' (Paragraph 8.76) with 'some models reflecting a cheaper rent cost or more flexible leasing arrangements' (Paragraph 8.77).

Schroders supports the development of managed workspace and co-working premises which support a range of SME users. However, Schroders considers that managed workspace should be delivered in locations where there is an identified need for this type of floorspace and demand from start-up businesses and SMEs, rather than in all new developments in the Borough.

Schroders considers that some forms of managed workspace will be treated as affordable workspace, but the Council's policy should not expect that all managed workspace will be treated in this way. We suggest that the Council should commission a Managed Workspace Study to form part of the Local Plan evidence base. This should look into demand, cost and location of managed workspace and affordable workspace in the Borough, and the impact on development viability of providing affordable workspace.

Question 50: Should any other parts of the SIL be re-designated as Industrial Business Park?

As described above, Schroders wishes to promote the opportunity to 'realign' the boundary of the existing IBP in Stewarts Road by bringing the eastern boundary back to a consistent line behind the Battersea Studios site and to extend the IBP to include Ingate Place and Havelock Terrace areas. This will create a more regular shaped zone which will form an effective buffer running the length of the SIL boundary.

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?

Schroders fully understands the aims and aspirations of the SIL policy designations. However, the SIL designation should consider the changing demands and styles of employment premises and as such the complementary uses that can work alongside these.

Schroders does not consider that it is appropriate to promote residential uses throughout the SIL. However, it strongly believes that the IBP, acting as a transition and buffer zone for the SIL, is a good example of where a more flexible approach to innovative mixed use development and residential uses should be considered. The overall aims of the IBP are to promote a higher quality environment for employment uses and provide a buffer between the residential uses to the west and the harder industrial uses to the east.

Schroders has been exploring ways of delivering high quality co-working floorspace on the Battersea Studios site which could increase the density and intensity of employment uses in the SIL, while delivering this alongside complementary co-living 'build to rent' development. This development model would create additional workplace by increasing density, would provide other uses and would create permanent neighbourhoods where people can live and work. This type of use would further develop and expand the creative SME cluster that is forming at Battersea Studios.

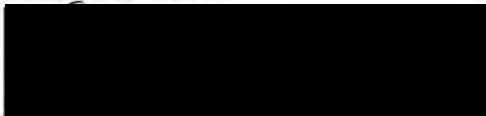
Schroders suggests that LBW should promote greater flexibility within the IBP in this location in particular which will see sites such as Battersea Studios thrive and meet employment and residential demand in the Borough.

Summary

Schroders considers that the consultation on the London Borough of Wandsworth Local Plan: Employment and Industry Review (options) presents an opportunity to consider the need for more flexible use of the IBP by introducing a mix of uses, including some form of housing, to the area which would complement and enhance the area's existing and future economic development potential.

On behalf of Schroders we welcome the opportunity to respond to this consultation and would welcome an opportunity to meet to discuss these representations with your team and to contribute to the new Local Plan being prepared by the Council. If you have any questions please contact me or my colleague Vicky Cartwright (020 7303 4172).

Yours sincerely

A large black rectangular redaction box covering the signature area.

Jeremy Castle
For Deloitte LLP

our ref: Q30195
your ref:
email: ben.ford@quod.com
date: 2 November 2016



Policy and Design Team
Planning and Transport Environment Community Services
Wandsworth Council
Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir,

**WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS
REPRESENTATIONS BY SCOTIA GAS NETWORKS (SGN) & NATIONAL GRID**

Quod has been instructed by its client Scotia Gas Network (SGN) and National Grid to submit representations to the Wandsworth Local Plan Employment and Industry Review – Policy Options. This document is out for consultation between the 7 October and the 4 November 2016 and these representations are submitted within this consultation period.

a) Background

Our client owns the Wandsworth Gas Holder which comprises a key component of the site wide employment and industry review.

Quod on behalf of our client made representations to the Wandsworth Local Plan EIP in 2014 and 2015 and these representations form part of the evidence base towards the deallocation of this site.

The representations previously submitted related to the requirement to conform to the London Plan and in particular, the London Plan policy which seeks the decommissioning of gas holder sites which have a significant potential to contribute to the provision of new homes and jobs on and around them.

The Wandsworth Gas Holder comprises a strategic site within the London Borough of Wandsworth both in terms of its proximity between the river Thames and Wandsworth town centre but also in terms of its current location with regards to adjacent development and the extent of its hazardous substances consent which prevents the delivery of numerous development sites within its radius.

We enclosed our representations once again which provide the background London Plan policy objectives for decommissioning at **Document 1**.

For the purpose of the Wandsworth Local Plan Employment and Industry Review – Policy Options the Wandsworth Gasholder is defined as the Gasholder site and adjacent land (to reflect the SSAD Local Plan Allocation). SGN are owners of the physical gasholder site and not the whole of the Map 8.3 allocation.



Map 8.3 Wandsworth Gasholder**b) Representations**

We have reviewed the document and would like to make the following representations.

Locally Significant Industrial Areas Chapter 8 Proposed Policy Options, Sub Chapter 8.2 E12 Protecting and Re-Designating Industrial Land Sub Section 8.2.3 Locally Significant Industrial Areas confirms that central Wandsworth (within which the gas holder is located) comprises 11.1 ha and is an existing locally significant industrial area (LSIA). The evidence base for this document the Wandsworth Employment Land and Premises Study confirmed that two areas within LSIA's have the potential for new development and intensification, one of which was the Wandsworth Gas Holder site. This site is identified at Map 8.3 within the policy options document (and this includes land beyond the gasholder). Paragraph 8.3 of the Policy Document confirms SGN's EIP evidence that the gas holder is subject to a protection zone by the health and safety executive which restricts occupation of development on surrounding sites and that re-designation of the site would aid and facilitate in the decommissioning of the site and removal of this zone and may assist in un-locking the site due to potential contamination costs. ***We support this approach.***

Question 7 – Should the Wandsworth Gas Holder site be prioritised for re-designation? We believe that the re-designation from the Central Wandsworth LSIA will prompt the removal of the health and safety executive zone and will facilitate redevelopment. This will spatially meet the core strategy objectives. This zone is an important development hinge between the River Thames lies to the north and Wandsworth Town to the south. Redevelopment for mixed use purposes would facilitate a greater cohesion between the two land parcels and improved regeneration for Wandsworth. We confirm that ***yes it should and we support this approach.***

Question 8 – Should re-designation include other sites?

Sub-section 8.4.3 Employment Intensification Areas Paragraph 8.63 confirms that the ELPS identifies 2 sites, one of which is the Wandsworth Gas Holder site which are not currently making optimal contribution to meeting demand for industrial floorspace. The ELPS recommends that this site could be re-designated for a mix of uses in order to identify the employment uses on site and through careful planning, the site could provide “light industrial floorspace along SME workspace, offices and other uses” as well as contributing to wider strategic objectives and place making initiatives. ***We object to this proposal.***

Question 26 Should the Wandsworth gas holder site be re-designated as an Employment Intensification Areas, seeking increased quantities of employment floorspace alongside other uses? The question and support text is poorly worded and ambiguous. We fundamentally disagree that the site could provide light industrial floorspace and this reference should be removed. This is a clear step backwards and would fail to meet London Plan policy tests for the redevelopment of gasholder sites. It appears an arbitrary land use inclusion with no consideration of the actual land uses and contamination issues which currently exist on site. This is amplified by the question being asked for a Gasholder site and a Bingo Hall, the two of which have fundamentally different baseline conditions. Question 26 suggests that increased quantities of employment floorspace alongside other uses should be sought but again it is unclear whether this is increased quantities beyond the floorspace that may exist on site at the moment. The gas holder site contains no class B employment floorspace, it is *sui generis* and the extent of built floorspace for the purposes of job creation is zero. The London Plan clearly states that higher value uses should be developed to incentivise de-commissioning and the Local Plan should accord with that policy. We recognise that some SME workspace may be prudent within the wider site allocation as part of positive place making and indeed the Map 8.3 Gasholder allocation already includes an SME office building which could be replaced as part of any wider redevelopment. ***We object to this proposal.***

8.4.4 Area Spatial Strategies and Site Allocations. Paragraph 8.64 confirms that the Adopted SSAD 2016 includes an Area Spatial Strategy for the Gasholder site and is replicated at Map 8.7. The document confirms that given the recommendations of 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 local plan review. We understood the area spatial strategies to promote a mixed use approach to redevelopment as opposed to setting out an industrial spatial strategy and ***clarification on this is sought.***

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.**

We believe this is a procedural issue rather than a spatial issue. Certainly as the majority of sites identified within the spatial strategy are subject to separate site specific allocations which have already been subject to planning application approvals this wider question is irrelevant and should only relate to the redevelopment future development plots. Should the Council wish to vary their site specific allocation document then the list of items identified would appear appropriate and plausible. As a landowner we would expect to be party to this review. ***Please keep us informed.***

8.5 E15 – New Employment Development Question 35, 36, 37, 38, 41, 42, 43, 45 discusses development design standards; Affordable, creative and flexible workplaces; Cultural Industries, managed workspaces; and affordability. The Council need to be careful not to create a web of overly restrictive development plan policy that simply stymies development. This is certainly the case with creative and cultural industries which need to be considered as part of a holistic approach to development viability requirements alongside affordable housing and CIL which isn't currently the case within Wandsworth at the moment. The document refers to a wide range of "products" without actually being clear about what these are, who they are for, and how they operate. A single clear approach would be beneficial. **We object to the approach to regularise commercial design, affordability, creative and flexible workplaces, cultural industries and managed workspaces design through the development plan as the current approach lacks definition and clarity.**

We trust that you will accept these representations and keep us informed of consultation moving forward.

Yours sincerely,



Ben Ford
Director

PD10208
email: jeremy.evershed@montagu-evans.co.uk

04 November 2016

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

Dear Sir or Madam,

LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS CONSULTATION (OCTOBER 2016)

We write on behalf of our client, S G Capital Group Limited. Our client has an interest in the land at 150A - 170 Penwith Road & 2 - 8 Thornsett Road, Earlsfield, SW18 ('the site'). A location plan is appended to this letter.

This site is the subject of a current application for mixed-use development, reference 2016/5444. The site was promoted for redevelopment in the Council's 'call for sites' in June 2016.

The site extends to 0.24 hectares, which is equivalent to 0.006 per cent of the Borough's supply of designated Locally Significant Industrial Areas ('LSIA') land, and less than five per cent of the total land within the Thornsett Road LSIA. It is currently occupied by a linear building along Thornsett Road with frontage hardstanding. This is sub-divided into 4 x B Class units, providing 577 sq m of floorspace. To the Penwith Road frontage is a large area of hardstanding and single-storey garage and a single storey reception building (210 sq m), all of which are associated with a car repair / MOT centre use (B2 / *sui generis*).

The purpose of LSIA's, as set out in current local plan policy, is to resist the loss of B-class uses and to restrict the introduction of other uses. At a national and regional level, however, there is a clear imperative to optimise the potential of sites to accommodate development and maximise economic, social and environmental benefits. Strategic policy thus seeks to ensure that best use is made of previously-developed land, with growth directed towards higher order centres, notably District Centres such as Earlsfield.

Given that the Council's consultants are recommending that a proportion of the borough's SLIA land be released selectively from its current restrictive industrial designation, we consider that there are strong grounds for removing the subject site of this representation from the Thornsett Road LSIA as part of this review.

Locational factors - such as the site's proximity to existing residential dwellings - mean that it is entirely unsuitable for activity that will give rise to amenity issues (eg uses in Class B2) and therefore it is at odds with

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the purpose of LSIA designation. Moreover, the site's spatial position within the District Centre means that it is appropriately positioned to accommodate a more intensive mix of town centre uses. This can include Class B1 uses which the Use Class Order 1987 specifically notes as uses that "*can be carried out in any residential area without detriment to the amenity of that area*". Accordingly, the client has put forward a specific option for redevelopment which proposes the like-for-like re-provision of commercial floorspace within a larger mixed-use scheme. That accommodation would be built to a modern standard and capable of meeting many occupier requirements.

In these circumstances, we do not consider that a single use designation of this site is appropriate. The alternative approach, which requires the release of a *de minimis* component of LSIA in a manner that would not compromise the general purpose of the wider Thornsett Road LSIA, would yield greater benefits than maintaining *status quo*, and it would address multiple planning policy imperatives.

In addition to proposals for changes to the designation, we consider that the Council's policies relating to LSIA's should be recast to allow greater flexibility for other uses on these sites. We note that the adopted Core Strategy's strategic objective is to maximise the employment potential of land in the Borough. The absolute protection of LSIA sites for industrial / storage uses only is not the most effective way to ensure future development helps to meet this objective.

We note, as does the consultation study, that the Borough has experienced a significant loss of B1a floorspace as a consequence of national changes to permitted development rights. This review therefore provides a timely opportunity to redress the current imbalance through allowing greater flexibility within LSIA's; a change that would also encourage significant investment and regeneration in these areas.

We would be pleased to engage with officers to discuss the Council's emerging Employment and Industrial policies in more detail. If you have any queries regarding the content of this representation, please contact Jeremy Evershed or Tim Chilvers at this office.

Yours faithfully,



Montagu Evans LLP

Site Location Plan

150A - 170 Penwith Road and 2 - 8 Thornsett Road
London, SW18



3 November 2016



Planning Department
London Borough of Wandsworth
The Town Hall Extension
Wandsworth High Street
London
SW18 2PU

Alex Graham
E: algraham@savills.com
DL: +44 (0) 20 7557 9995

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Dear Sir / Madam

Employment and Industry Review: Policy Options Document (October 2016)

We write on behalf of our client, South Western Estates Limited, to make representations to the Wandsworth Employment and Industry Review: Policy Options Consultation Document (October 2016).

We understand that the Council is producing a new Local Plan document covering employment premises and industrial land which will form part of the new Local Plan. It will replace the existing employment and industrial land policies.

We note that the Consultation Document has been informed by the responses received during the earlier preparation stage, as well as the Employment Land and Premises Study (2016) prepared by AECOM.

Background

Our client's site comprises a small single storey commercial property on Burr Road; we enclose a site location plan. It is located to the rear of 319 – 321 Merton Road, facing on to Burr Road. To the immediate north is the residential development at 315-317 Merton Road. To the immediate south is Southfields Academy. The site currently provides 59 sq m of B8 (storage) floorspace.

The property is located within the Kimber Road 'Locally Significant Industrial Area' (LSIA), on the periphery of the designated area. It is not considered to be part of the core industrial area. Residential uses (Use Class C3) are located in close proximity; to the immediate rear of the application site is the residential block at 315-317 Merton Road.

The main point of access is gained through the principle elevation of the property that fronts Burr Road.

The site has a Public Transport Accessibility Level (PTAL) rating of 2 out of 6, which indicates a poor level of access to transportation links.

Draft Policy Questions

The Consultation Document sets out a number of policy options and questions on the proposed approach. We have addressed the relevant questions below.

Kimber Road LSIA Designation

Our client's site comprises a small industrial storage unit (B8) located on the periphery of the Kimber Road 'Locally Significant Industrial Area' (LSIA). Map 1 attached shows the current boundary of the LSIA.

The site's immediate setting has changed significantly since the LSIA was originally designated. It is now characterised by a mix of uses, including residential, and it is therefore not suitable for use for noisy industrial or storage uses which would have an adverse effect on the amenity of the immediate area. Map 2 attached shows the new uses surrounding our client's site.

It is on the above basis that we formally **request** that the corner section of Merton Road / Burr Road, including 1A Burr Road is de-designated from the Kimber Road LSIA to reflect the new uses and context that has emerged since the original designation of the LSIA. Map 3 attached shows the proposed boundary modifications.

Q.1- Which of the three growth scenarios should Wandsworth plan for, when considering the need for employment land and premises in the borough?

The Consultation Document presents three proposed growth scenarios for office and employment land in the Borough.

There is forecast demand for office-based employment, whilst industrial premises are expected to contract in Wandsworth. Across the wider region and in nearby Boroughs it is expected that employment for office and industrial jobs will expand. The supply and demand for industrial land indicates that there will be a surplus of industrial land in both low and central growth options. There would be additional demand in the high growth option.

On the above basis, we are of the view that the Council should support a flexible growth strategy that considers the changing demand in the local market for employment floorspace and neighbouring boroughs. We therefore support growth scenario for 'Central Growth' as the mid point between the various scenarios.

Q.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?

We request that the LSIA boundary is amended to remove the southern part of the LSIA from the wider designation. As set out above, this section is no longer considered suitable for use for noisy industrial or storage uses which would have an adverse effect on the amenity of the immediate area.

Question 10: Should the Council continue to protect the other LSIAs in their entirety for industrial-type uses?

Adopted Development Management Policy DMI1 seeks to protect existing B1(c), B2 and B8 floorspace in SILs and LSIAs, unless full replacement provision is provided. The policy states:

"Within the SILs and LSIAs, the loss of existing B1(c), B2 and B8 floorspace will be resisted unless full replacement provision is provided. Planning permission will be granted for new B1c, B2 and B8 development subject to compliance with Policy DMS1. In accordance with Core Strategy Policy PL7, SILs are also appropriate locations for waste management activity"

"With the exception of the provision of small scale uses which cater to the local needs of people working in the area which may be appropriate other use classes are considered unacceptable in

these areas.”

It is recognised the new Local Plan for Wandsworth will replace the existing employment and industrial land policies, including Policy DMI1.

We consider there to be scope for the Council to adopt a more flexible approach to development proposals within LSIA's. We do not consider it necessary for the Council to protect industrial-type users in their entirety.

Our client's site, 1a Burr Road, is currently in use as a storage facility which does not employ any individuals. It is a small unit at 59 sq m (GIA), therefore, it is deemed to be of lesser strategic importance than other SILs or other parts of LSIA's.

Whilst we recognise and support the Council's underlying objectives to protect and encourage employment growth and economic activity, we consider there to be greater opportunity to deliver residential / mixed use residential use on this site, which would be more compatible to neighbouring uses, particularly 315-317 Merton Road.

Furthermore, AECOM's Employment Land and Premises Study (2016) forecasts the demand and supply for office floorspace and industrial land in the Borough between 2016 and 2036. It is noted that there may be a decline in the need for industrial premises in London by 2036, as stated above. Therefore, this consultation process offers the opportunity to release those sites which could be put forward for more suitable uses, such as residential, or office space, without harming the economic objectives.

Should the Council be minded to retain the current of 1A Burr Road within the Kimber Road LSIA, we request that the wording of Policy DMI1 has greater flexibility to encourage a mix of uses in LSIA's, including residential, where it can be demonstrated that the use would be compatible with neighbouring uses.

Our request accords with the Government's National Planning Policy Framework (NPPF) (Published March 2012) which *“provides a presumption in favour of sustainable development”* and from which we consider the following to be of particular relevance:

- that plan-making should *“positively seek opportunities to meet the development needs of their area... with sufficient flexibility to adapt [to] rapid change, unless:

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”* (Para 14);
- Paragraph 17 states 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. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities...”* (Para 17)
- that planning should *“encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”* (Para 19 – 20);
- that planning policy should *“support existing business sectors, taking account of whether they are expanding or contracting... Policies should be flexible enough to accommodate needs not*

anticipated in the plan and to allow a rapid response to changes in economic circumstances” (Para 21);

- *“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.” (Para 22)*

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?

As outlined above, we consider there to be scope for the Council take a more flexible approach to development proposals within LSIAs.

We consider Policy DMI1 to be too isolated and restrictive. Should there be a decrease in demand for industrial premises then it would be more sustainable for such units to be converted in to uses for which there is ongoing and long term demand.

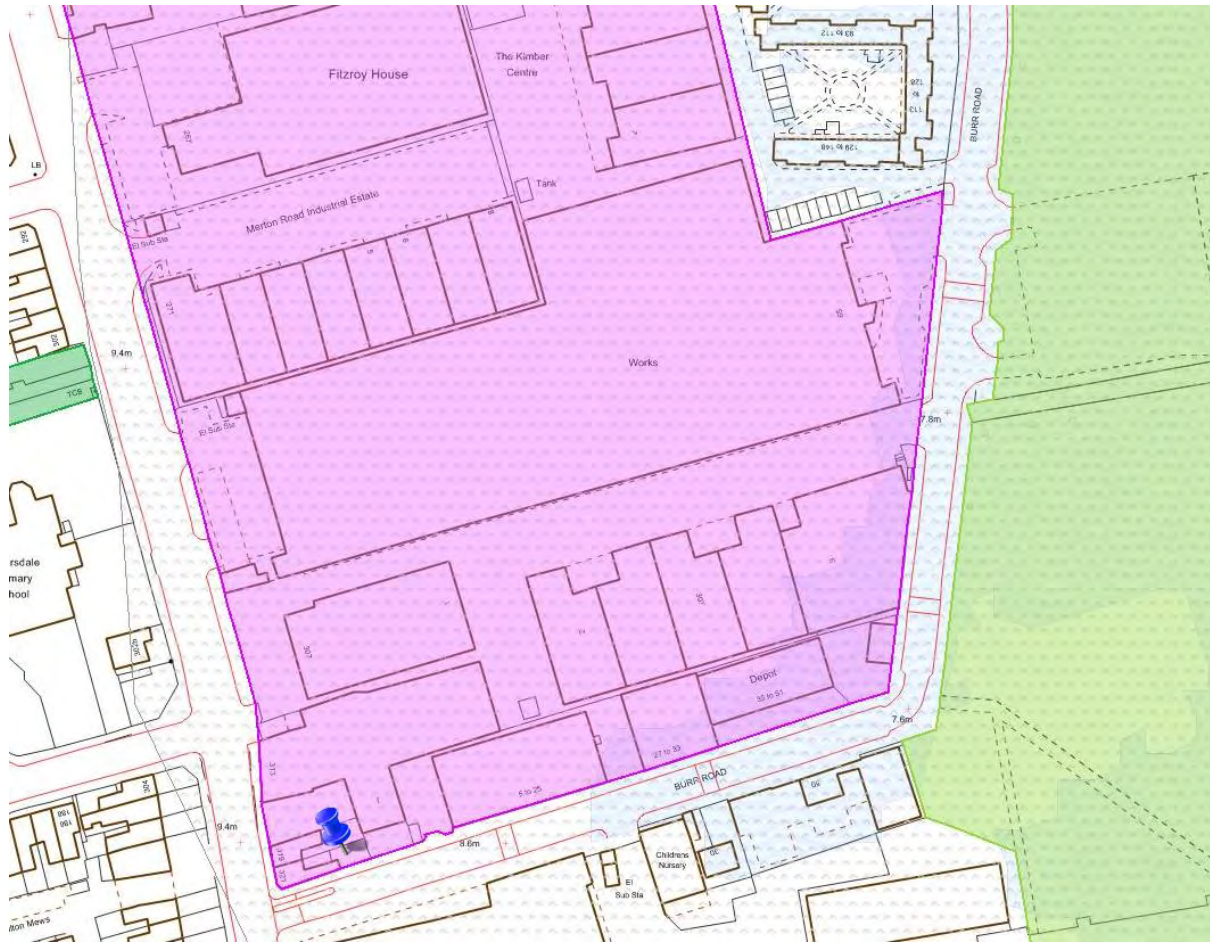
We look forward to hearing from you that these representations have been duly registered. If you have any queries, please contact Alex Graham on the above contact details.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Savills", is positioned below the text "Yours sincerely,".

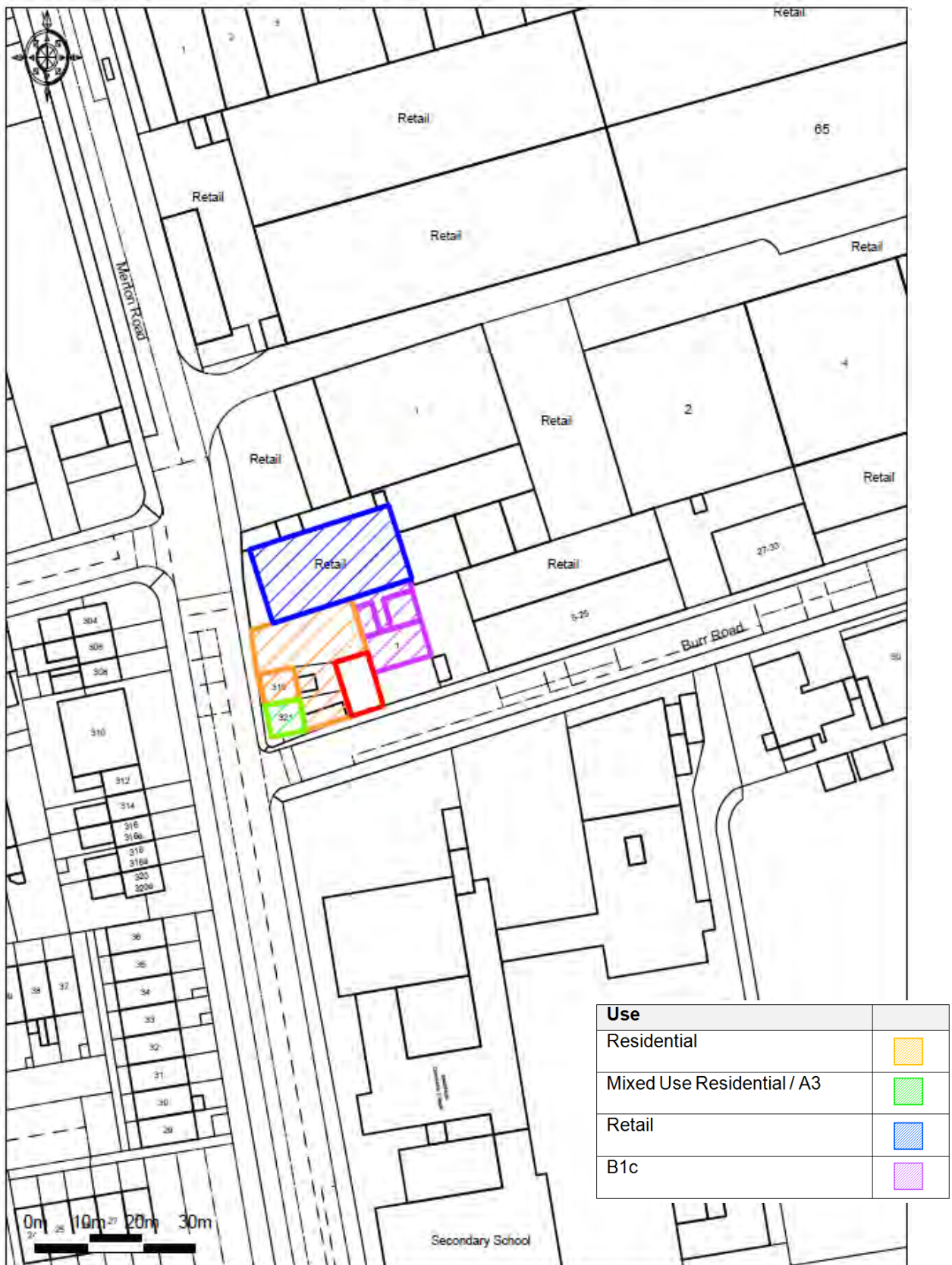
Savills

Map 1: Current Boundary of Kimber Road LSIA, including 1a Burr Road (when pin drop is locate)



Extract: Wandsworth Local Plan Policies Map, adopted March 2016

Map 2: Existing Land Uses



Map 3: Proposed Boundary Modification to Kimber Road LSIA



03 November 2016

Our ref: LBW EIR reps 02

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

By email: planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

RE: Local Plan: Employment and Industry Review – Policy Options Consultation (Oct 2016)

St William Homes LLP ('St William') is pleased to provide representations in response to a consultation on Wandsworth's Employment and industry review – policy options consultation (Oct 2016).

St William Homes are a joint venture company formed by the Berkeley Group and National Grid Property Holdings (NGPH). The partnership has been established to lead regeneration of redundant gasholder sites across London and the south-east. The Berkeley Group brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of well-designed new homes using a landscape led approach. SWH shares with Wandsworth Council a commitment to deliver high quality new homes whilst promoting regeneration of underutilised brownfield land.

St William Homes have an interest in a parcel of land located within the Central Wandsworth Locally Significant Industrial Area (LSIA). The representations enclosed follow those submitted in response to the first round of consultation held in December 2015- January 2016. This letter responds to the relevant questions posed as part of the consultation and are set out below.

Question 7: Should the former bingo hall in Bendon Valley and the Wandsworth gas holder site be prioritised for re-designation?

The site's northern and southern boundaries are adjacent to residential areas and in particular the area to the south is adjacent to a Mixed Use Former IEA (MUFIEA). Given this, the sites close proximity to the town centre and its low employment generating potential, it is considered that the site is not wholly suitable for employment uses. On this basis we strongly support the prioritisation of the re- designation of the Wandsworth gas holder site provided that any re- designation allows for residential led mixed use regeneration.

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?

As stated in previous representations submitted, the latest GLA projections show that sectors which generally require office floorspace are predicted to grow whereas sectors associated with industrial floorspace are predicted to decline. The sectors projected to grow include the professional, real estate, scientific and technical services, accommodation and food service activities, information and communication and administrative and

St William Homes LLP, Berkeley House, 15b St George Wharf, Vauxhall, London, SW8 2LE

Tel 020 3725 8980 www.stwilliam.co.uk

Registered Office: Berkeley House, 19 Portsmouth Road, Cobham, Surrey, KT11 1JG. Registered in England and Wales Number OC396332

support service activities sectors. It is agreed that the most appropriate locations for these sectors will be in town centres and focal points of activity in the Thames Riverside area. These uses generally have much higher employment densities than industrial uses and therefore need to be close to public transport hubs and other services and facilities for employees.

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?

As stated in the response to Question 7, given the sites context and proximity to residential uses, other areas of MUFIEA and the town centre, the principle of re-designation of the site is accepted provided that any future designation is flexible to allow for residential mixed used development. There is a clear steer in the evidence base for the site to provide for a *mix of uses*. The ELPS recommends that these sites could be re-designated for a mix of uses and that, through careful planning, could provide for a mix of employment uses as well as other uses, which would contribute to wider strategic objectives and place-making initiatives.

National policy (NPPF) makes it clear that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. When considering the total industrial area needed and supply as set out in the draft document it is considered that further loss of this site could be both justified and enabled. The Council's proposals for employment intensification of the site are not clearly evidenced.

The current draft policy proposals to de-designate the site to an 'Employment Intensification Area' (EIA) not only gives the impression of a protected employment site in policy terms, it does not actively promote a mix of uses in line with the evidence base, which ultimately would jeopardise strategic regeneration objectives and other plan making objectives for both this site and the wider area. Nor does it meet the NPPF requirements noting long term protection of employment land. On this basis, the Wandsworth gas holder site should not be re-designated as an EIA, but should be either de-designated entirely or at least re-designated to a more flexible MUFIEA type allocation which allows for residential led mixed use development.

The economy of London changes rapidly and so too does the space and location requirements of industrial and employment land. There is a continuing decline in traditional industrial sectors and as a consequence many older employment sites (particularly industrial locations) do not meet the needs of new businesses that require flexible modern premises in good strategic locations.

The requirement to provide increased quantities of employment floorspace does not take into consideration that different employment uses have differing employment densities and that the needs of businesses in terms of floorspace are constantly changing. For example, recent research suggests that office employment densities are increasing in London due to factors such as cost saving, hot-desking and other flexible working practices. Modern premises are generally more space efficient than the ones they replace and therefore are able to employ more people. It is therefore considered that a more flexible approach should be taken.

Lastly, the NPPF makes it very clear that Plans should be *deliverable* and have regard to *viability*; in particular, paragraph 173 stipulates that the sites identified in the Plan should not be subject to such policy burdens that their ability to be developed viably is threatened. National policy further highlights that brownfield land is often more expensive to develop and stipulates that where the cost of land is a major barrier, Local Authorities should engage with landowners in considering options to secure the successful development of sites. The EIA designation would severely prohibit any regeneration of the area in this regard.

The consultation documents make reference to the gas holder site being 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.' Re-designation of the site as an Employment Intensification Area and limiting land uses permitted, is unlikely to generate sufficient funds needed to bring

forward any reuse of the site itself, will restrict the opportunity for uses to come forward on surrounding sites and will fail to meet NPPF provisions.

Question 29: What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?

The NPPF sets out a core planning principle that local planning policies should encourage the effective and efficient use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. It also highlights the preference of the re-use of such sites that are located in sustainable, accessible locations such as the Wandsworth Gas Works Site. In addition, National policy makes it clear that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. Specifically, paragraph 157 of the NPPF notes that Local Plans should allocate sites to promote development and *flexible* use of land, bringing forward new land where necessary.

At a regional level, the Mayor's 'A City for all Londoners' document sets out a direction for London, which the Mayor will later expand upon in detailed strategies, including housing, land use and growth, as part of a full London Plan review. The document suggests an increased annual housing target of 50,000 homes a year (*compared to the current target of 42,000*) and indicates that the Mayor will use the principle of 'good growth' to plan for development. Specifically, in relation to employment land, the document states that surplus industrial land could be better used for housing, with industrial businesses moved to other locations in London. It may be feasible for industrial and residential uses to 'co-exist' in mixed developments and the Mayor emphasises the need for housing intensification around town centres.

Given this and the ELPS recommendation that the Wandsworth Gas Holder site could be re-designated for a mix of employment and other uses as part of a residential mixed used scheme, it is considered that a mix of floorspace and uses should be provided for and along with this, it will be imperative that housing provision should be included within any policy going forward.

In terms of quantity of floorspace, it is considered that further detail such as quantum should be set out in a SPD as guidance and should not be contained within a Development Plan policy to allow for flexibility of the Plan itself.

Furthermore, it is noted that, the planning framework has changed considerably since the last Wandsworth Employment Land Review (2010) with the publication of the National Planning Policy Framework (NPPF) in 2012 and subsequent National Planning Practice Guidance (NPPG) in 2014. The NPPF's focus on the 'presumption in favour of sustainable development' requires an approach which seeks to meet the development needs of an area and requires that these needs be objectively assessed with sufficient flexibility to respond to rapid change. Therefore to ensure the longevity of the proposed policies, detail such as quantum should be set out in a SPD as guidance and should not be contained within a Development Plan policy.

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.

It is considered that further detail such as quantum should be set out in a SPD as guidance and should not be contained within a Development Plan policy.

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?

Again as stated in response to question 30, it is considered that further detail such as design should be set out in a SPD as guidance and should not be contained within a Development Plan policy.

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?

Again as stated in response to questions 30 and 33, it is considered that further detail such as design should be set out in a SPD as guidance and should not be contained within a Development Plan policy.

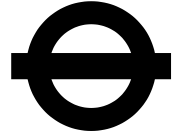
St William trust that their comments will be duly considered as the Employment and Industry Review Policy Options Document is finalised. Should you wish to discuss these comments or require any further information please do not hesitate to contact myself (Lucy.bird@StWilliam.co.uk)

Yours sincerely



Lucy Bird

Head of Planning



Our Ref: 16/3960

Rob McNicol,
Wandsworth Council,
Planning Policy,
Environment & Community Services,
Town Hall,
Wandsworth High Street,
London,
SW18 2PU.

4th November 2016,

Dear Rob,

Wandsworth Local Plan: Employment and Industry review - policy options

Many thanks for consulting TfL on the Wandsworth Local Plan Employment and Industry review.

TfL notes the proposed re-designations of industrial and employment land in the policy options document and have the following comments:

Strategic Industrial Location (SIL)

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?

The Nine Elms Partnership has invested heavily in public realm design guidance and cycle strategies for the Opportunity Area. TfL notes that in considering the future of this space, every opportunity should be taken to improve pedestrian and cycling connectivity. This is particularly important with large pieces of infrastructure affecting north south and east west movement. With the introduction of the Northern Line and developments throughout the Opportunity Area, this is an important time to consider if SIL is retained how the area can be opened up to connect to the surrounding area.

Locally Significant Industrial Areas: Questions 7-10.

TfL is satisfied that the borough has acknowledged TfL's proposals for the Wandsworth Town Centre gyratory system in their policy options for the gas holder sites and other sites within the town centre. Although the reconfiguration of the gyratory is likely to involve significant land take from the east side of Putney Bridge Road and a relatively small widening of Wandsworth Plain, these areas appear to be outside the current review of employment and industrial land. Thus, provided the new road alignment is secured, TfL considers the re-designations within the town centre and the gas holder site would not impact on the gyratory removal scheme.

The gyratory removal scheme should be clearly reflected within the consultation around the re-designation of these sites and the potential for improved links reflected.

With regard to the Bingo Hall, with any development coming forward at this site consequent to re-designation, TfL would expect a Transport Assessment (TA) to be submitted and appropriate mitigation to be secured through section 106 agreement / CIL. Currently the local bus routes in the area are in capacity.

8.2.4 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.

TfL would support any effort to improve cross connectivity. Dependent on the scale of re-designation, TfL may require an element of transport assessment to be undertaken. This would update the transport study undertaken as part of the Opportunity Area Planning Framework (OAPF).

8.2.6 Industrial clusters and undesignated sites

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?

With regard to converting railway arches along Winthorpe Road, TfL has been looking to convert arches directly opposite East Putney station on Upper Richmond Road. An improvement programme for the arches is subject to be implemented over the next few years. TfL Commercial Property will be responding separately with an update on this project.

8.3.1 Employment Protection Areas

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?

When designating land for office clusters, the council are encouraged to have a clear policy on transport accessibility and parking, reducing reliance on the car. This should be reflective of London Plan policy. TfL is supportive of focusing activity into areas of good and excellent accessibility.

8.5.2 Large-scale Mixed Use Development

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?

TfL's view is that co-location of uses, particularly in areas of excellent accessibility should be encouraged. This should not just be limited to office uses, but often other industrial uses such as light industrial or storage and distribution uses can work together with residential. Clear policies can help frame design principles that developers can adopt. TfL would be keen to work with the council on this aspect, particularly in the light of the Mayor's commitment through City for All Londoners to explore intensifying development around stations.

8.7.1 Queenstown Road SIL

Question 48: Should the Havelock Terrace area be designated as Industrial Business Park?

It is understood that the borough is proposing to re-designate sites in the Havelock Terrace area from Strategic Industrial Land (SIL) to Industrial Business Park (IBP). From a highways perspective, TfL has no objection to this designation, however detailed transport assessments will be required with individual planning applications or at an area wide scale to consider changes of use.

Summary

In summary, TfL hopes these comments are useful in informing the Local Plan. TfL requests that the gyratory removal scheme is clearly reflected within the consultation around the re-designation of sites in and around the town centre and the potential for improved links reflected. Considering pedestrian and cycle connectivity in Nine Elms is important through this work, TfL may require an element of transport assessment to be undertaken in this area which would update the transport study undertaken as part of the OAPF. With regard to, the designation of office clusters, TfL would encourage clear policies concerning transport accessibility, parking and reducing reliance on the car. Focusing activity into areas of good and excellent accessibility would be highly encouraged. The co-location of uses, particularly in areas of excellent accessibility should be encouraged which should not just be limited to office uses, but may also include other industrial uses such as light industrial or storage and distribution uses which can work together with residential. Clear policies can help frame design principles that developers can adopt and TfL would be keen to work with the council on this aspect. Subject to the above, TfL would be happy to meet with the Borough to discuss these matters further.

With regard to converting railway arches, as previously mentioned, TfL Commercial Property will be responding separately with an update on the project for converting railway arches.

Yours sincerely,

Ramona Kayindu
Assistant Planner - Borough Planning
Email: RamonaKayindu@tfl.gov.uk
Direct line: 020 3054 7044



Date: 11 November 2016

By email
Wandsworth Council
Planning Policy, Environment & Community Services,
Wandsworth Town Hall
London
SW18 2PU

Commercial Development

Transport for London
5th Floor West Wing
55 Broadway
London
SW1H 0BD

Phone: 020 7027 9258
Email: adamprice1@tfl.gov.uk

Dear Sir/Madam,

Consultation on the Employment and Industry Review – policy options consultation (October 2016)

Thank you for consulting Transport for London (TfL) on the Proposed Submission Local Plan. The following comments represent the views of officers in Transport for London Commercial Development Property Team (TfL Property) in its capacity as a significant landowner only and does not form part of the TfL corporate response. Our colleagues in TfL Borough Planning will provide a separate response regarding TfL wide operational and land use planning/transport policy matters as part of their statutory duties.

We note the contents of the Policy Options Document and have the following comments, relating to TfL landholdings.

Question 13: Should the clusters and sites identified above be protected for industrial and distribution uses?

No. The railway arches and adjacent land are not considered to meet the criteria set out in the Mayor of London's Land for Industry and Transport SPG (2012) for sites that require long term or strategic protection. The London Plan (para 4.20) states that the sites must be designated on the basis of robust evidence demonstrating their particular importance for local industrial type functions; this has not been demonstrated for TfL owned site, C28 railway arches. As demonstrated within the Industrial Land Supply and Economy Study (2015), London is currently experiencing a higher overall vacancy rate for industrial floor space than GLA guidance recommends, therefore care needs to be taken at the local level as to what industry is to be protected. The high churn rate suggests that there is flexibility within the industrial market and so with increasing industrial densities and sectoral changes industrial spaces must remain flexible.

Question 14: Should this include specific protection for such uses located in railway arches?

No, we do not support further policy protection of railway arch sites. As the Employment Land and Premises Study (2016) states, there is a typical inability to convert railway arch premises to residential uses, which means they are likely to remain commercial in nature. Therefore, a specific policy to protect them is deemed unnecessary and inappropriate.

The variety of sectors and usage within the railway arches means that policy should be flexible enough to allow them to adapt and ensure conformity with para 14 of the NPPF. Some sites, including TfL owned C28, Winthorpe Road railway arches, have been identified

within the ELPS (2016) as being of poor quality and condition with potential for redevelopment opportunities. This is accepted by TfL and therefore, no specific protection should be applied. This will ensure there is sufficient flexibility to adapt to differing types of uses, and ensure conformity with the NPPF (para 14).

Such locations, close to transport links, are naturally better suited to high-intensity uses such as commercial for retail.

Question 24: Are the areas listed above the most appropriate for new office development?

We support the development of offices where located within areas of good public transport accessibility levels, however this should not be limited to town centres, the CAZ or Focal Points where sites are suitable and come forward for development.

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?

We would support the promotion of mixed-use schemes in areas of excellent public transport accessibility, where these are viable and practicable and the consideration of employment uses on upper floors should not be ruled out where desirable.

Conclusion

We trust that the above representations will be seriously considered before the next stage of the partial review. Should you wish to further discuss these matters, please contact us via the above details.

Yours faithfully,

A black rectangular redaction box covering the signature of Adam Price.

Adam Price
Consents Advisor, Commercial Development

Cc:

Full Name	Company / Organisation	Doc section	Question	ID	Comment
Mr Ross Anthony	The Theatres Trust	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?	EILP49	<p>The Theatres Trust would support provisions in the new local plan to protect existing, and promote the provision of new and additional affordable creative work spaces. This would support and augment existing requirements to protect community and cultural facilities, as outlined in para 70 of the NPPF. The Trust agrees with the approach taken in the London Plan to promote cultural clusters, and a key element of this is to promote and protect creative work and performance spaces, and to support key cultural quarters. One of the key issues is affordability as many creative spaces are under pressure and are increasingly being traded in for more lucrative uses, particularly residential uses. Sustainable communities need creativity and cultural opportunities to support the economic, social and cultural well-being of local communities, and the local plan needs to be very clear that it wishes to protect and promote these spaces and the creative industries. The Trust would recommend policy wording along the lines of: Cultural and creative spaces Development of new cultural and creative spaces will be encouraged and supported. The loss or change of use of existing cultural and creative spaces will be resisted unless replacement spaces are provided on site or within the vicinity which meet local need; or it has been demonstrated that there is no longer a need for the spaces or demand for another cultural or creative use on site. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations. The amount and type of creative spaces should be secured via a section 106 agreement. The Trust also recommends that the developer involves the end user in designing these spaces before the planning application is submitted and the section 106 agreed to, to ensure these spaces are designed correctly, are useable, affordable, and meet the needs of the relevant creative industry being sought. It is important to avoid the provision of a token space that does not meet the needs of anyone and that would be expensive to retrofit to make the spaces useable.</p>
Mr Ross Anthony	The Theatres Trust	Question 40	Should the Local Plan seek to provide new cultural spaces (such as performance, rehearsal,	EILP50	<p>The Theatres Trust would support provisions in the new local plan to seek the provision of new and additional affordable cultural and performance spaces. This would support and augment existing</p>

Full Name	Company / Organisation	Doc section	Question	ID	Comment
			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?		requirements to protect community and cultural facilities, as outlined in para 70 of the NPPF. The size and type of cultural spaces should be secured via a section 106 agreement. As with our answer above, the Trust strongly recommends that the developer involve the end user in designing these spaces from the outset. Performance spaces are costly and need to be designed to meet specific needs of the theatre company using the space. An end user should be involved before the planning application is submitted and the section 106 agreed to, to ensure these spaces are designed correctly and are therefore viable, as they are expensive to retrofit to make the spaces useable. To facilitate this, we recommend the model used by the London Borough of Southwark who maintain a database of creative groups looking for creative spaces. The Council area then able to involve these groups with developers from the pre-application stage to help facilitate the provision of purpose built creative spaces that meet the specific needs of these local groups. This also avoids the possibility of oversupply of a particular type of facility where a developer is required to provide a space with no real assessment fo local need.

Full Name	Doc section	Question	ID	Comment
CLlr Rosemary Torrington	Question 14	Should this include specific protection for such uses located in railway arches?	EILP16	The Winthorpe Road railway arches should provide employment although not necessarily of an industrial nature.
CLlr Rosemary Torrington	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?	EILP17	Insofar as Winthorpe Road railway arches are concerned these spaces could be used for non-industrial use although the use should generate employment.
CLlr Rosemary Torrington	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?	EILP18	Agree that C34, C35 and C36 should be retained to provide employment space.
CLlr Rosemary Torrington	Question 19	Are there other parts of the borough where existing offices should be protected?	EILP24	Blades Court offices on Deodar Road should also be retained as offices for employment use.
CLlr Rosemary Torrington	Question 29	What quantity and mix of floorspace and uses could these areas provide? Should this include housing provision alongside employment uses?	EILP25	A mix of office space and residential doesn't work well where office personnel are looking directly into private habitable rooms in residential use. Otherwise the intensification of land use during the day and night works well.
CLlr Rosemary Torrington	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	EILP26	Investment in public transport is also important in the Wandle delta. Wandsworth Town station has been operating beyond capacity even with longer trains. If use is intensified to include employment use, investment will also be needed in public transport to bring people to work and to relieve the existing pressure on WT station.

Full Name	Doc section	Question	ID	Comment
		character of the area; Place-making initiatives such as cultural uses and activities.		
CLlr Rosemary Torrington	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?	EILP19	Office ceiling heights seem to be very high compared with residential ceiling heights. This makes for much taller buildings than necessary. Consider reducing recommended ceiling heights. Office windows of over 3m metres in height looking directly into bedrooms windows opposite is not appropriate.
CLlr Rosemary Torrington	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?	EILP27	Take care when installing servicing areas as these are not compatible with residential homes. The servicing area at 116 Putney Bridge Rd has been created directly opposite residential homes and this is not suitable. Similarly very large windows are looking directly into residential homes in breach of privacy policies in the DMP. Care needs to be take to apply the Council's policies.
CLlr Rosemary Torrington	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?	EILP20	Yes.
CLlr Rosemary Torrington	Question 41	Should the Local Plan seek to ensure that affordable workspace is provided for businesses in the borough?	EILP28	Yes
CLlr Rosemary Torrington	Question 41	Should the Local Plan seek to ensure that affordable workspace is provided	EILP21	This could be useful because if rents are set too high and freeholders can't let the premises, they will apply to change the use to C3

Full Name	Doc section	Question	ID	Comment
		for businesses in the borough?		residential. If the rental requirement is clear from the outset, hopefully it should avoid this problem.
CLlr Rosemary Torrington	Question 57	Are the above criteria the most appropriate to demonstrate that there is no demand for employment floorspace?	EILP22	Checking that the premises are being marketed at a price commensurate with market values for a particular area is important. It would be unfortunate for the freeholder to seek to change use to C3 because that it seen as a more lucrative land use.
CLlr Rosemary Torrington	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?	EILP29	Is a list of central list retained of vacant properties? Perhaps the BIDs could actively seek to market vacant spaces to attract new tenants and maintain a vibrant economy.
CLlr Rosemary Torrington	Question 60	Should the Local Plan continue to place restrictions on the alternative uses for which the premises can be used?	EILP23	Ideally, protect employment use otherwise applications could be made to convert it to C3 residential use.
CLlr Rosemary Torrington	Question 61	Should this approach also be applied to offices in Focal Points and the CAZ, as well as Town Centres?	EILP30	Ideally, retain town centre uses such as retail, restaurant and office in town centres.

CB/CC/P5510
4th November 2016

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sirs,

**London Borough of Wandsworth Local Plan
Employment and Industry Review – Policy Options Consultation Document (November 2016)**

We write on behalf of our client, TR Property Investment Trust Plc (TRPIT), to make representations on the London Borough of Wandsworth's Local Plan 'Employment and Industry Review – Policy Options' with particular reference to the following site:

- **Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW**

We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.

The Ferrier Street Industrial Estate is located within Wandsworth, close to Wandsworth Town Station (see enclosed site ownership and location plan). Ferrier Street comprises 16 x two storey small business units with limited servicing/parking providing circa 800sqm per unit. There is a wide range of existing tenants including catering businesses, tool hire, and motorcycle hire. Whilst the units (on the whole) are in reasonable state of repair, the accommodation is becoming outmoded and is in need of upgrading to better reflect tenant requirements and modern business needs. Furthermore, the existing tenants have expressed that they would prefer improved employment space with more adaptable floorspace with improved access and services arrangements

The site is identified in Wandsworth's Core Strategy as part of the Central Wandsworth Locally Significant Industrial Area (LSIA) where adopted policy typically seeks to resist the loss of B1c, B2 and B8 uses within LSIA's and prevent the introduction of non-industrial/storage uses.

A representation was previously made for this site within the December 2015 Employment and Industry Review Consultation' which supplied a proposed master plan for the site.

Our client was disappointed to note that Ferrier Street was not prioritised as a site suitable for re-designation. We were informed by officers that the primary reason for Ferrier Street not being allocated is the strong on-going demand for industrial land in the borough identified in the ELPS by

Architecture Planning Interiors

Old Church Court, Claylands Road, The Oval, London SW8 1NZ

T 020 7556 1500

www.rolfe-judd.co.uk

DD 020 7556 1529

E chrisb@rolfe-judd.co.uk

AECOM. The evidence suggests that Wandsworth should be seeking to protect industrial land where possible, and particularly where it is successful and performing well. Wandsworth considered that Ferrier Street was successful and performing well.

Although Ferrier Street has not been recognised as a site with potential for de-designation we consider that it remains a viable candidate. We do not consider that occupancy levels alone can be the determining factor. We consider the evolution of uses within the estate, the level of investment required and the gradual change in the surrounding area all need to be considered. We therefore wish to respond to the Policy Options Consultation Document and re-iterate why we consider a change in the allocations would be suitable for Ferrier Street.

Proposed Masterplan

To support our client's representation on the employment land review and to explain the aspirations for the site further, we resubmit the high level masterplan prepared by AHMM Architects (copy enclosed). The masterplan sets out the existing site constraints (which include site access, transport, aged accommodation and physical barriers) and site opportunities (which include enhanced employment accommodation, improved street scene, improved vehicular and pedestrian access, improved relationship with Old York Road, mixed use development).

The masterplan indicates an enhanced level of employment floorspace on the site while introducing a residential and retail element. The key thrust behind the proposals remains providing an improved employment provision for the existing tenants. The design of the employment accommodation will be designed with the existing tenants to ensure their needs are met.

It is important to stress that our client's aspiration is to protect and enhance the existing employment offer. Our client is not seeking to re-allocate the site to remove the business space but to allow greater flexibility and a range in the business offer.

However, to enable the proposals to move forward on the site, the LSIA designation needs to include greater flexibility to allow the introduction of other commercial and potential residential uses within certain parts of the site to support the continued employment space.

We consider the re-designation of this site from the LSIA would enable the introduction of alternative uses to support the employment offer. Whilst we anticipate that the complete removal of the estate from the site allocation may be ambitious, we consider that re-allocating this area from a LSIA to a MUFIA would equally allow the desired flexibility of uses on site required to accommodate the proposed masterplans. Equally, we consider there is scope to de-allocate certain parts of the site, for example the area of land adjacent to the train station, which has the potential to unlock the future improvements of the employment floorspace.

An excellent example of a redevelopment within the MUFIA is Wandsworth Business Village. This site was re-allocated from a LSIA to a MUFIA in anticipation of a mixed use development. (The Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m business centre; - in tandem with 209 residential apartments, retail space, and a crèche. The residential and non-B1 components of the scheme cross-subsidised the replacement of the existing (and largely out-moded) business space at the site with a new 'flexibly designed' business centre. The scheme also provided wider improvements to the Hardwicks Quarter).

Whilst Ferrier Street would not accommodate the same level of redevelopment (due to the nature of the surrounding area), the principle of retaining the employment floorspace within a new development remains the same.

Policy Options Questions

In light of the above, we addressed the potential for the re-designation of Ferrier Street within each of the Council's consultation questions below.

Question 1

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

We consider the 'Low Growth' scenario should be planned for. The supply and demand exercise already acknowledges that the forecast demand for industrial land is below the existing provision. The study also recommended that 17.5 hectares of industrial land may be lost however acknowledges that the loss needs to be weighed against the wider planning benefits on the sites.

The London Industrial Land Supply & Economy Study 2015 states that the rate of release from 2010 to 2015 is 105ha per annum compared with the SPG-recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. The document considers the current rates to be excessive and a more moderate rate of release would be appropriate instead. However the report acknowledges that Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%. These findings clearly suggest that the employment densities are increasing in the remaining industrial areas.

The study also concluded that that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. The study puts forward mechanisms which would allow this flexibility, namely the potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield), and the potential for intensification on existing land. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

Uncertainty surrounding Britain's decision to leave the European Union has also raised uncertainty regarding these growth scenarios and how to address the short, medium and long term impacts of this decision on the industrial market. Our client considers that a reflexive policy approach will be necessary in order to allow for land owners and tenants to adapt accordingly.

Question 2

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

There is still much speculation surrounding the impact of Britain's decision to leave the EU. It is still unclear whether there will be a 'hard' or 'soft' Brexit' and what form trade relationships will take with the EU and internationally. AECOM's Employment Land and Premises Study (2016) for Wandsworth states that the vote is likely to have a significant effect on the economic growth trajectory over the short to medium term but it is less clear what effect Brexit will have on the long term. This poses a significant problem for this Employment and Industry review which is required to take a long term view. AECOM's study advises that the Borough should monitor the demand for land and premises against the long term strategic aspirations and respond, not to short term effects and consequences of Brexit, but to the long term strategic position and balance of supply and demand.

Meanwhile the short to medium term impacts may still cause issues for the plan; for example, AECOM note that a fall in sterling has made the UK a more competitive area to manufacture which could drive demand, but ahead of new trade deals being negotiated international companies could be cautious of investing in the UK, and existing businesses may not look to expand.

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?

The Strategic Objectives outlined in Section 6 fail to acknowledge the importance of intensification on existing industrial sites. Recommendation 5 of the ELPS states the following:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation only references the Havelock Terrace site, the reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. This recommendation is not reflected in the Spatial Vision or Strategic Objectives and should be incorporated. Despite the intensification of employment sites being raised in relation to the plan's SILs, LSIA's, MUFIEAs and Employment Intensification Areas; the theme is not given weight by the Strategic Objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land. For these reasons, we consider that the intensification of employment sites should be one of the tenants of new Plan's Strategic Objectives.

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?

Our client supports the appropriate protection of Wandsworth's Industrial Areas through the use of suitable industrial designations.

In our previous representation we made the point that Policy DMI1 of the DMPD appears counter intuitive as it affords the same blanket protection to both SILs and LSIA's when they are both different designations with different characters and uses. Equally it does not seem logical to safeguard land which falls under each designation even if it is not suitable for that use or in poor state. In line with the London Plan, we are of the opinion that consolidation of both SILs and LSIA's strengthens the designation as a whole. De-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land.

Recommendation 4 of AECOM's ELPS report strongly encourages the protection of the existing designated employment land; however the document has also recommended the release and re-designation of several sites within the SIL and LSIA including Havelock Terrace and the Former Bingo Hall site in Bendon Valley. Our client is disappointed to see that their previous representation for Ferrier Street has not been de-designated from its LSIA status.

We consider the re-designation of this site from the LSIA would enable the introduction of alternative uses to support the employment offer. We consider that re-allocating this area from a LSIA to a MUFIA would equally allow the desired flexibility of uses on site required to accommodate the proposed masterplans submitted as part of this representation.

The Council must continue to acknowledge the need for the Council to work collaboratively with developers and land-owners to produce comprehensive regeneration of both SILs and LSIA's where necessary. Policy 4.10 Part A(c) (New and Emerging Economic Sectors) of the FALP states that Council must work with developers and businesses to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space'.

Question 9

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

The Ferrier Street Industrial Estate differs from the majority of the other industrial estates covered by the generic LSIA policy designation in that the estate;

- Sits directly adjacent to Old York Road, a vibrant retail street which has retained much of its historic character and village atmosphere ;
- Is in very close proximity to a residential area;
- Directly next to Wandsworth Town Train Station;
- Has a buffer along the railway line to the north which increases the potential for redevelopment.

As a result, the existing buildings (and the land-use itself) have contrasting relationship to the neighbouring retail/residential buildings and contribute little to the historic setting/character of Old York Road. There is a clear visual and land use division between the estate and the retail/residential offering directly in front along old York Road. We consider greater integration between the two areas would benefit the area.

Similarly, the site forms a rather abrupt relationship with the station forecourt – failing to provide any direct frontage or active relationship with this well used public space. We consider there is an excellent opportunity to introduce a retail element fronting the station forecourt which would significantly enhance the area.

Whilst the estate is largely let, it is reasonable to assume that the existing industrial buildings are likely to require a significant level of investment over the next 5-10yrs to either replace or upgrade the existing accommodation. Paragraph 8.28 of the Policy Options document recognises that they may need significant investment in forthcoming years. On this basis, our client would like to consider options/opportunities for the improvement and redevelopment of the Estate. Any new development at the site would continue to provide the same level of employment/industrial space but at a much improved standard to meet modern day requirements.

However, given the relatively low density of the current use/built form; consideration is also being given to the opportunity to introduce other land-uses such as residential in order to increase value and support the provision of employment space, but also to achieve a better relationship with the surrounding land-uses (particularly Old York Road).

It is recognised that the introduction of residential accommodation (and other non B1c, B2 and B8 uses) will represent a departure from the current policy designation. However, TRPIT believes that a mixed-use scheme can deliver a number of benefits (particularly in terms of achieving a better relationship with the surrounding area) which would help support either a departure or change in the policy designation for the site. TRPIT are looking to work closely alongside the Council in order to facilitate the successful regeneration of this industrial area through the development of a masterplan or otherwise.

Question 10

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

Based on the recommendations of the AECOM report and the findings of the London Industrial Land Supply & Economy Study 2015, the Council should not continue to protect other LSIA's for industrial type uses in their current form.

It is not logical to safeguard land which is unsuitable for that use or is in a state of disrepair. In line with the London Plan, we are of the opinion that consolidation of the both SIL and LSIA strengthens the designation as a whole. De-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land. To this end, Recommendation 4 of AECOM's ELPS report strongly encourages the protection of the existing designated employment land, however the document has also recommended the release and re-designation of several sites within the SIL and LSIA including Havelock Terrace and the Former Bingo Hall site in Bendon Valley. We would suggest that our client's site on Ferrier Street is also de-designated from its existing LSIA status.

The Council must continue to acknowledge the need for the Council to work collaboratively with developers and land-owners to produce comprehensive regeneration of both SILs and LSIA's where necessary. Policy 4.10 Part A(c) (New and Emerging Economic Sectors) of the FALP states that Council must work with developers and businesses to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space'.

Question 11 to Question 15

Not relevant to Ferrier Street

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?

No. Our client is supporting the low growth scenario as we consider the predicted provision will meet demand.

The second part of this question is not relevant to our client.

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?

Wandsworth have failed to emphasise the importance of intensifying their industrial uses across all designations. SILs, LSIA and MUFIEAs despite the recommendations of the ELPS report and the London Industrial Land Supply & Economy Study 2015. Recommendation 5 of the ELPS states:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation only references the Havelock Terrace site, the reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land.

The London Industrial Land Supply & Economy Study 2015 goes on to suggest that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield). Going forward, London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

The rate of release for 2010 to 2015 is 105ha per annum compared with the SPG recommended rate of release of 36.6ha per annum. The Council must carefully consider what the impact of this continued decline in industrial land will have the form of its industrial areas. Once combined with the uncertainty fuelled by Brexit, the Council finds itself in a difficult position going forward. We consider that increased flexibility and promotion of higher density developments within the existing designated industrial is prudent for Wandsworth.

Question 27

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

No comment – please see answer to Q28.

Question 28

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

In our previous representation we approved of the flexibility afforded by the MUFIEA designation. In its current form MUFIEAs encourage rather than restrain new development and appear to provide a fantastic opportunity to diversify employment uses on sites whilst simultaneously intensifying the uses that currently operate there. The designation would suit our current vision for Ferrier Street, in that it encourages the incorporation of multiple uses (including commercial, employment, residential and community facilities) on site in order to generate opportunities for unified, coherent regeneration on our client's site.

However, the development of suitable business space for small and medium-sized enterprises (SMEs) should be given more prominence within the MUFIEA policy. These businesses would greatly benefit from the mix of uses permitted within MUFIEAs as well as the complimentary commercial elements that are located on Old York Road. The encouragement of SMEs is clear opportunity for the Council promote intensification of employment floorspace whilst achieving the objectives of MUFIEAs set out in Policy DMI2. We would also encourage that the promotion of SMEs are given more prominence in this policy and other relevant policies such as Policy PL 6 (Meeting the needs of the local economy).

Employment Intensification Areas (EIAs) appear to be much the same as MUFIEA designations in that they seek to increase the density of existing uses whilst providing complimentary commercial, employment and community uses; however EIAs do have a greater focus on providing SME workspace.

We consider that the new EIA designation is not necessary as it would over-complicate the existing industrial hierarchy; the MUFIEA designation could be altered very slightly to accommodate the EIAs aims instead. The sites Wandsworth Gas holder site and the Former Bingo Hall are currently being considered for re-designation to EIA, we suggest that they are either given status as an MUFIEA or as an allocated site.

Furthermore, the Council should seek intensification more broadly across its SIL, LSIA's, MUFIEAs and undesignated industrial sites as opposed to isolating the aim solely within the new EIA designation.

Question 29

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

If either of the MUFIEA or EIA designations were adopted, attaching specific quantities or mixes of floorspace could be too prescriptive. Each case will have different challenges and aims on the side of both the developer and the Council. We consider that the Council should allow flexibility for these sites so that they can come forward naturally in the future. We consider that it would be incredibly difficult to provide an exact quantum for development which would apply to all sites and would remain relevant throughout the entire lifetime of the Local Plan, i.e. the ELPS report raises concern over the short to medium term impact of issues like Brexit, whilst the long-term effect are too difficult to predict. Sites which share the designation should have similar strategic objectives but if these targets are too rigid then this can hinder development coming forward in these areas. Therefore, quantum of floorspace should be decided on a site-by-site basis.

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?

We consider that the Local Plan could continue to outline high level design requirements expected from developments however rent level, leasing and management may fall outside of the planning requirement. These requirements should avoid being overly prescriptive by allowing for flexibility in order to attract and accommodate a wide range of employment opportunities.

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?

The consideration and demonstration of employment and residential uses complementing each other is already a key test within any mixed-use planning application. The relationship between residential and employment uses needs to ensure they work in harmony both physically and operationally.

Question 41

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

We do not agree that affordable creative workspace should be addressed in a prescriptive manner, for large scale developments or otherwise. We consider the requirement for 'affordable workspace' may actually restrict certain developments which already have to meet a wide range of policy requirements, including affordable housing. There is also uncertainty regarding the definition of 'Affordable Workspace' and what it would actually comprise.

Question 42

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

See answer to Q41

Question 43

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

See answer to Q41

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?

We consider the gradual evolution of uses within LSIA needs to be acknowledged. The interest and demand for Ferrier Street has changed. Our client is approached from modern uses such as artisanal foods, coffee manufacturers etc. who are interested in the space but do not fall within Class B1, B2 or B8. The interested businesses would provide an equivalent or more employment for the estate but the site allocation prevents the intensification.

The provision of industrial floorspace is possible on Ferrier Street but the introduction of office (class B1) or community uses (D1/D2) or residential are required to act as an enabler for redevelopment and the re-provision of industrial space.

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?

No, we consider the contrary. As stated above, non B1(c), B2 and B8 uses are essential to facilitate the refurbishment or re-provision of B1(c), B2 and B8 uses.

Question 66

As set out in the response to Question 3 above, the Strategic Objectives outlined fail to acknowledge the importance of intensification on existing industrial sites.

Recommendation 5 of the ELPS states the following:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

The reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. This recommendation is not reflected in the Spatial Vision or Strategic Objectives and should be incorporated. Despite the intensification of employment sites being raised in relation to the plan's SILs, LSIAs, MUFIEAs and Employment Intensification Areas; the theme is not given weight by the Strategic Objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land. For these reasons, we consider that the intensification of employment sites should be one of the tenants of new Plan's Strategic Objectives.

Summary

We trust the above response is of assistance and will enable Ferrier Street to be reviewed in light of the responses. We would be more than happy to meet officers on site to discuss the key issues outlined above and our suggestions for the formulation of future policy.

We look forward to hearing your views in relation to the above in due course.

Yours faithfully,

Chris Brown
Rolfe Judd Planning

Ferrier Street Industrial Estate

SW18, Wandsworth

The existing Ferrier Street Industrial Estate contains 16 two-storey utilitarian small business units each providing circa 800sqm. There is a range of existing tenants including a tool hire firm, a joinery business, motorcycle and scooter hire company and catering companies.

The general street scene is poor within the industrial estate. Whilst on-street parking is controlled, the estate suffers from ad hoc parking, open waste collection on the streets, and cluttered forecourt areas in front of the business units.

The character and architecture of the industrial estate also has no relationship with the village character of Old York Road. All units have limited active street frontage, forming a

stark contrast with the vibrant cafes and shops on the Old York Road.

The site is neither part of Wandsworth Town Conservation Area or of any other conservation area. There are no listed buildings on the site either.

Tenants at the industrial estate have expressed they would prefer better 'fit for purpose' spaces, with more adaptable floorspace (to allow for expansion), improved servicing and better customer facing reception areas - all of which cannot be achieved with the existing units and layout.



Existing Site Plan

Old York Road shops & restaurants

Disjointed pedestrian route from the station to the retail units on Old York Road due to interruption by the access road to the industrial estate - road used frequently by delivery vans & lorries.

Existing unit with limited active street frontage - no longer fit for purpose as tenants prefer better customer fronting reception.

Uninspiring station forecourt which is fronted by the end wall of an industrial unit.

Wandsworth Town Station - main transport link for Wandsworth Town area to the city



01 Square at corner of Ferrier Street and Old York Road

Existing industrial unit with limited active street frontage - no longer fit for purpose as tenants prefer better customer fronting reception.

Ad-hoc parking evident on streets in the industrial estate

Open waste storage on the pavement creating an undesirable environment

Poor street scene - no relationship with the historic character of Old York Road

Close proximity between residential buildings & industrial units



02 View down Ferrier Street from west



03 Thomas Street looking north west

Site Analysis

Site Constraints

Site Access

Vehicular access is currently possible via Old York Road into either Ferrier Street, Edgel Street or Morie Street - all two-way roads with 30mph speed limit.

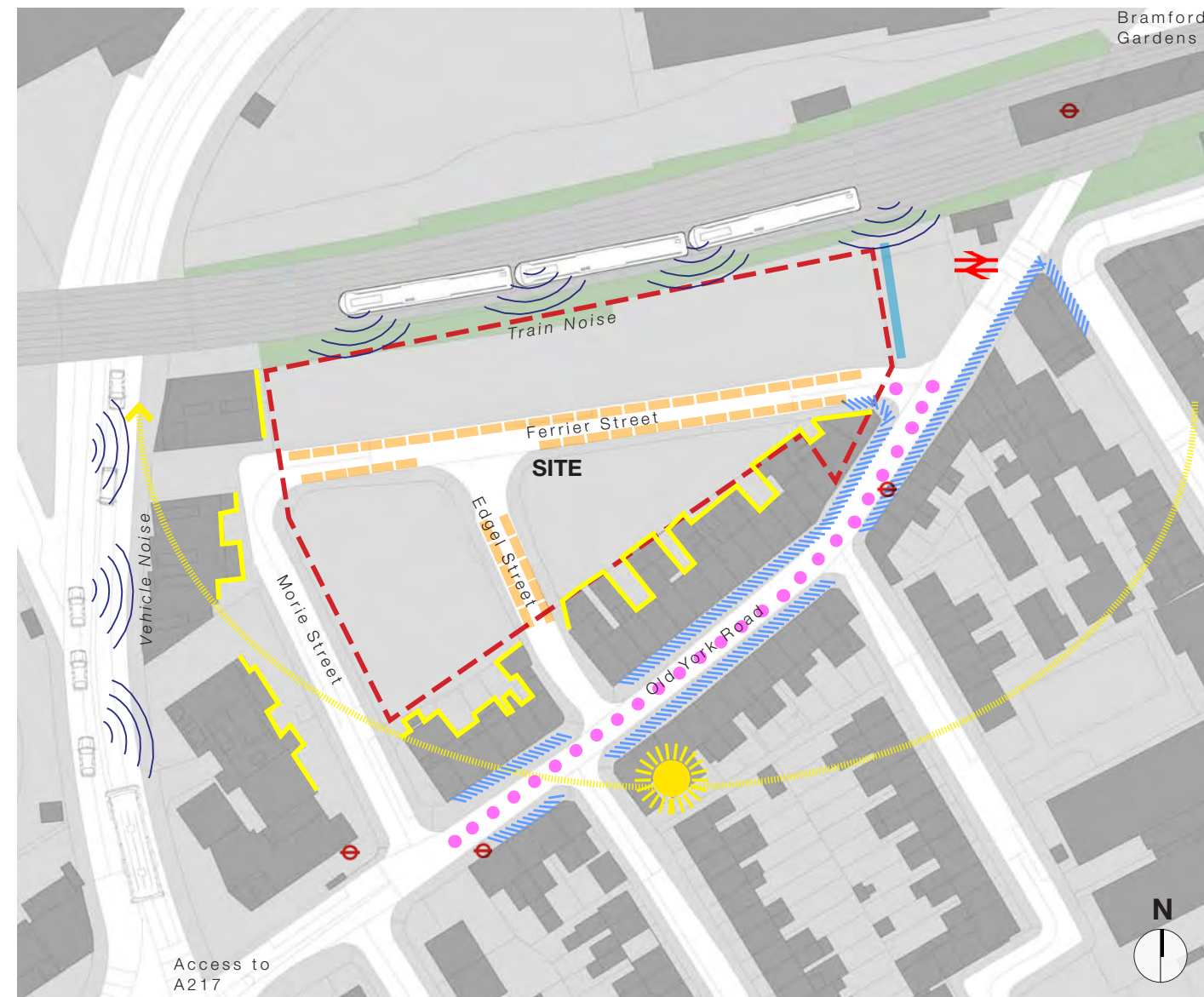
Transport

The area is served by the bus network, there are several bus stops along Old York Street. Wandsworth Town Rail Station is 50m east of the site. It also has great connections to the

surrounding area via Clapham Junction station which is 1 mile away. Large amount of car parking on street.

Barriers

Adjacent to the station forecourt is a large wall (blue line).



Site Plan

- Site Boundary
- ⊕ Bus Stop
- ≡ Train Station
- Rights of light & daylight requirements to be confirmed
- Active street frontage
- Pedestrianised retail precinct - 20mph
- Noise impact

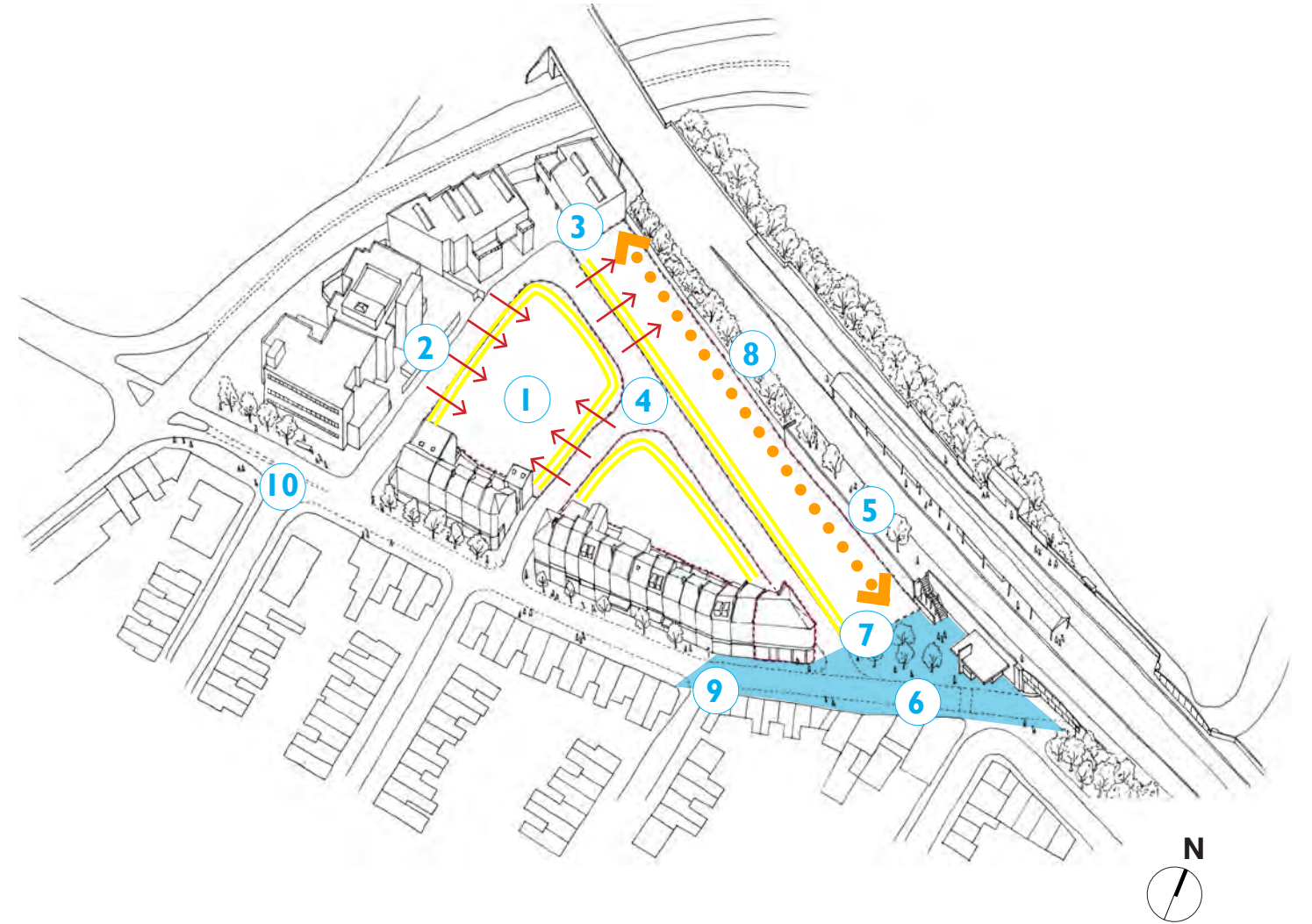
Site Opportunities

The redevelopment of the site offers a number of opportunities which can address the current issues. These include:

1. Provide improved business accommodation with better front doors
2. Provide dedicated servicing areas for new commercial spaces
3. Better located parking & servicing activities.
4. Encourage commercial vehicles to avoid new forecourt

plaza

5. Take advantage of relationship with station to improve density of development
6. Open up station forecourt
7. New facade to station forecourt opening up the street.
8. Provide a buffer along railway line
9. Ferrier Street becomes a proper street with new landscaping and a lot more delightful. Create improved pedestrian routes through site
10. Achieve better relationship with the use of Old York Road



Design Opportunities

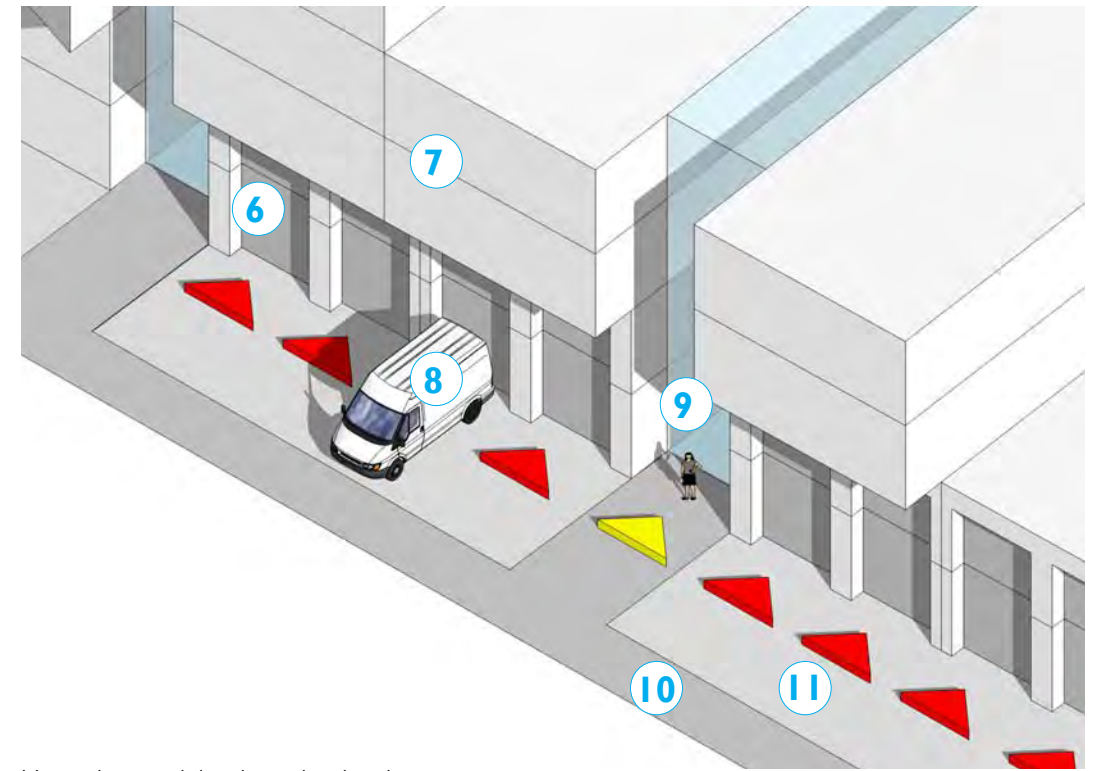
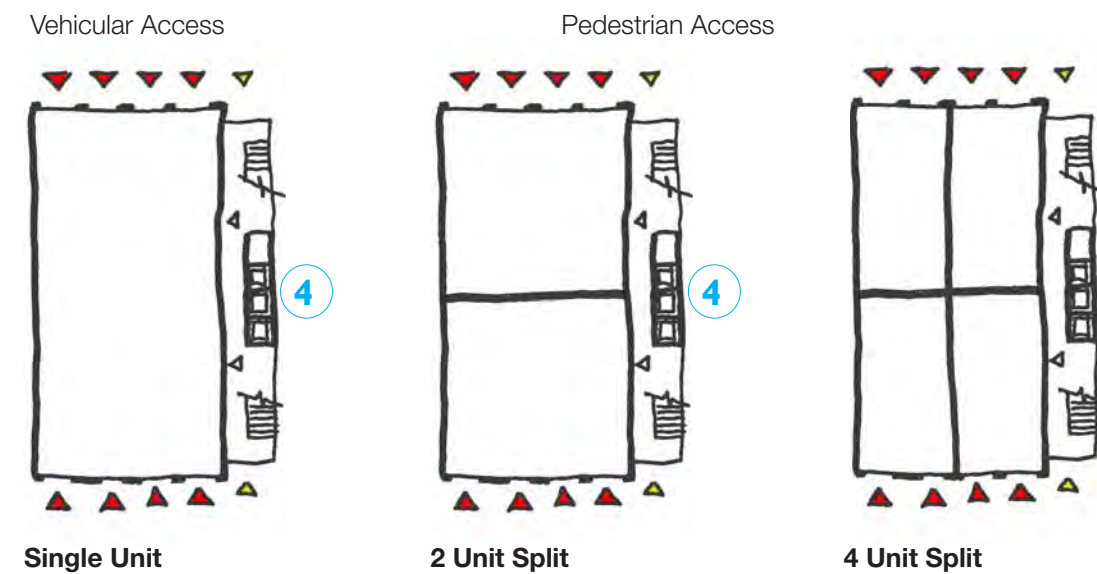
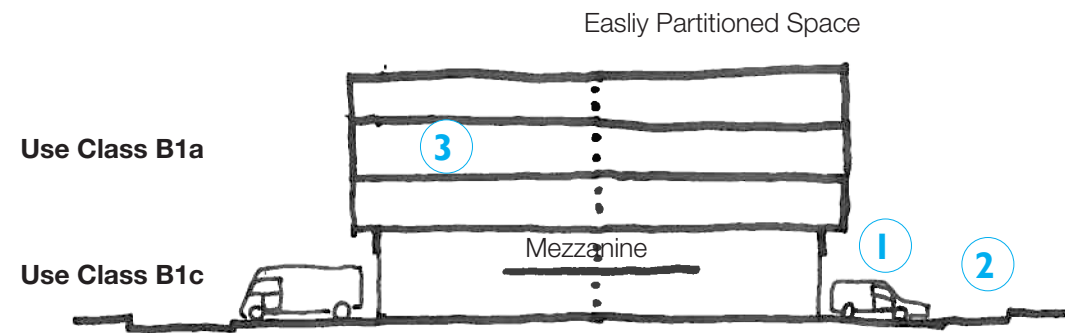
B-Class Use Typology

The proposed brief is to match the existing quantum of commercial accommodation on site, which consists of mainly single-storey sheds and replace it with denser and more appropriate flexible space.

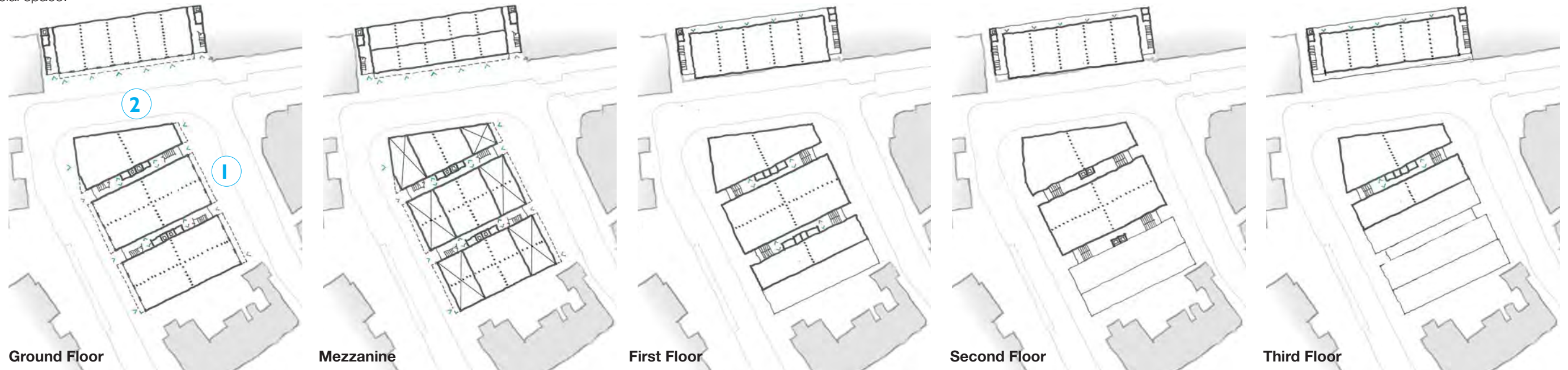
The space should be:

- Affordable commercial space
- Optimum flexibility
- Easily partitioned space to create units from 4,000sqft to 16,000sqft
- Provide off-street servicing
- Higher quality office and commercial accommodation
- Adaptable units to limit costly tenant modifications.
- Develop a high quality design approach reflective of the area which is also contemporary in design
- Provide proper front doors to units to enable tenants to undertake customer facing business.

1. Ground floor B1 space with good vehicular access and on-site servicing.
2. Opportunity to create a commercial loop around Ferrier St, Moire St and Edgel St and vehicle loading area.
3. Upper floors contain additional commercial which can be connected to ground floor unit with ease.
4. Modules are separated by simple cores that can be demised or shared.
5. Module repeats and creates viable and valuable commercial space.






- How the servicing is maintained
6. Translucent shop-fronts along street frontage
 7. Commercial spaces above
 8. Vehicle access points
 9. Pedestrian entrances to shared core and commercial units.
 10. 4m deep access zone
 11. 2m deep pavement

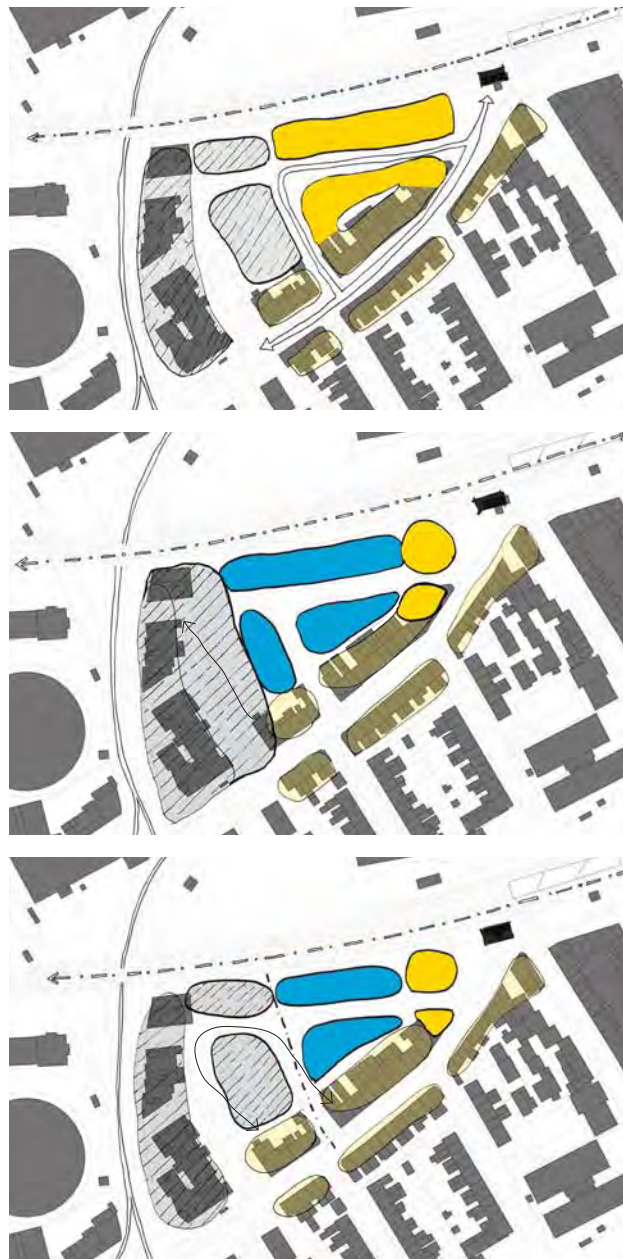


Design Proposals

Masterplan Ideas

1. New employment space with distribution potential at ground floor.
2. New employment space lining railway edge.
3. New mixed use with an employment focus lining the railway (through-aspect south facing).
4. New mixed use with an employment focus lining Ferrier Street
5. New Mixed use with employment retained at lower level.
6. Retained retail in existing building.
7. Square relined with retail uses to create better place

-  Employment
-  Mixed Use with an Employment Focus
-  Mixed Use with Employment Retained



Masterplan Iterations

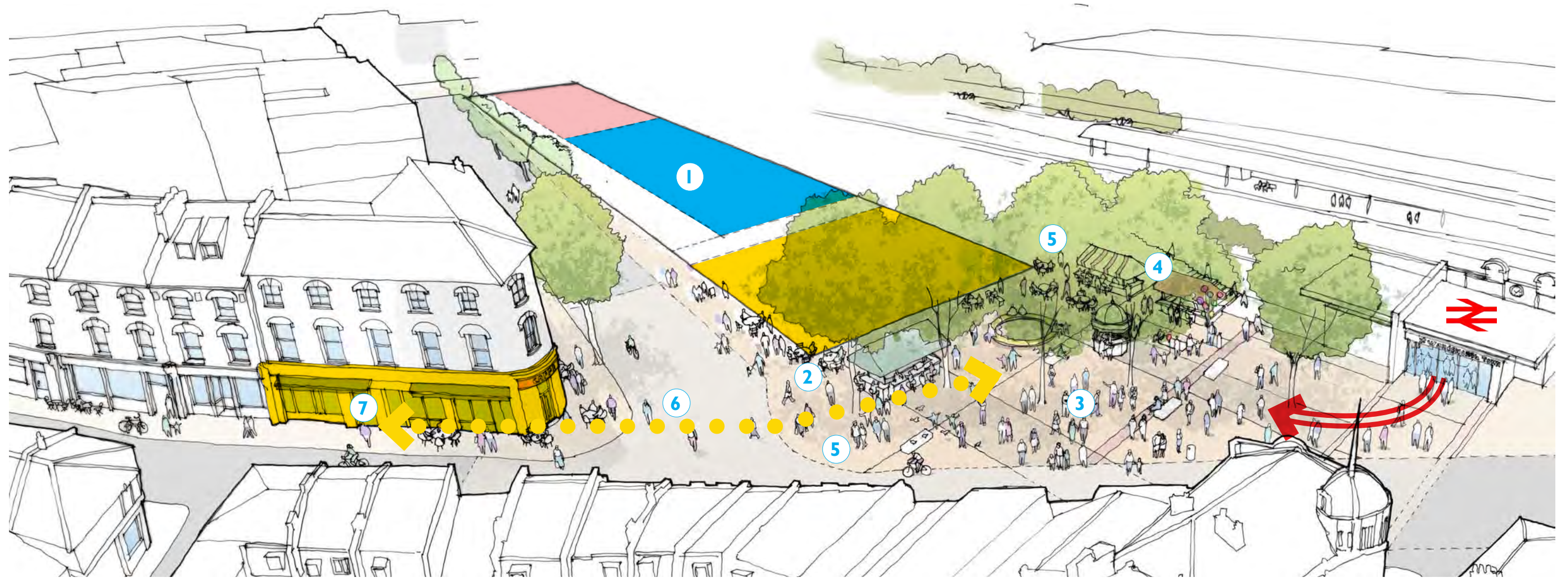
Ferrier Street Industrial Estate



ALLFORD HALL MONAGHAN MORRIS

Design Proposals

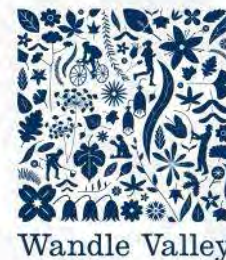
Making the plan and section



- Employment
- Mixed Use with an Employment Focus
- Mixed Use with Employment Retained

1. Site along the viaduct cleared.
2. Wall adjacent site and station forecourt removed.
3. Opening up of the station forecourt.
4. New retail stalls added to station forecourt.
5. Landscaping enhanced and made more inviting.
6. Improved pedestrian access across Ferrier Street.
7. Retained retail unit wrapped around Ferrier St elevation.
8. Old York Road retail frontage 'extended' to the station.
9. Entrance from station more dynamic and better owned.

Wandle Valley Regional Park Trust
The Old Bookshop
Morden Hall Park
London
SM4 5JD



FAO: Rob Nicoll
Policy and Design Team
Planning and Transport
Environment & Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

7th November 2016

Dear Rob,

RE: Initial response from Wandle Valley Regional Park Trust on Employment and Industrial Land Review

I am writing to you as agreed in a recent phone exchange with a holding response for the consultation process on Employment and Industrial Land Review, in lieu of a meeting.

The Wandle Valley Regional Park and Trust was set up in 2012/2013 to provide the leadership and coordination for the delivery of the regional park in the Wandle Valley. An area described in our memorandum and articles of association as being 1.6km either side of the Wandle River and to cover the boundary covered in the All London Green Grid Area Framework 8 document which is SPG for the London Plan.

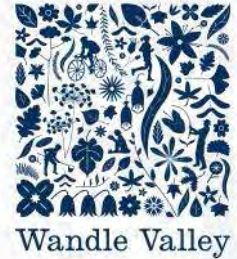
The London Plan, the ALGG and the four boroughs which incorporate the Wandle Valley, Wandsworth, Merton, Sutton and Croydon, have accepted this area designation through their individual Local Plans and through the endorsement of the Trust by the

[REDACTED] our boroughs on our Board as Trustees and Directors. With regards [REDACTED] of Trustee and Director is Cllr Sarah McDermott and Cllrs

The work of the Trust is underpinned by the 2008 Vision document and the ALLGG. This work and focus is now being refreshed by the development a new Strategy for the Trust, which is currently in its last stages of consultation.



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Planning considerations

Of prime importance to the Wandle Valley Regional Park Trust is the areas immediately adjacent to the River Wandle, and the access routes to the river.

We will seek, always, to preserve, develop, enhance and improve access to the river, the Wandle Trail and access/ connectivity routes from existing green spaces and new public realm. With a particular emphasis on preserving public rights of way along the Wandle Trail, new river side developments and the opening up hitherto inaccessible areas of river frontage. We would expect that any development of these sites or re designation would take these former principles into account.

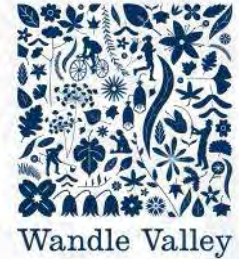
This has special resonance in the Delta area of the Wandle Valley where there is opportunity to create new public open space developing the Wandle Trail and connecting it to the Thames Riverside Walk. We also see the opportunity of enhancing the public realm in this area to maximize the connectivity for pedestrians and cyclists along the Wandle Trail to the river and the Thames Path or routes to Wandsworth Town train station.

We are mindful in the areas highlighted in the plan below from the review document, as areas that are adjacent to the river and its hinterland and are sites that could be developed or re designated. Whilst seeking to always achieve the overriding principles outlined above, we would also seek to maximize opportunities that can support the development of the Wandle Trail and address the 'Missing Links', from the Delta to King Georges Park and from King Georges Park to Trewint Street.

Specific emphasis must be placed on the development sites adjacent to Trewint Street and the Haslemere development in Merton. We have a good relationship with First Base developers who have supported the development of new access to the river and the [REDACTED] space as well as creating a mixed development with the [REDACTED] up enterprises. In contrast to the current planning applications for the development sites on Penwith Street which do not appear to maximize the opportunities here to address the relationship with the river and how this cluster of potential development could use the existing feasibility study into addressing the missing Wandle Trail link.



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Mixed development

The Wandle Valley is home to some 20% of London's manufacturing base and this directly relates to its postindustrial heritage from its Victorian heyday.

Whilst we recognize growth in London and the need for residential properties, we also recognize the need for mixed development to create more balanced developments and communities and would support the retention or redevelopment of some of the smaller clusters of small scale industrial alongside residential and commercial.

We see that this mix of development offers the Trust and the Regional Park opportunities to develop micro sites and pocket spaces for public realm enhancements. See projects and programs below.

Strategic Programs and Projects

As mentioned above the Trust is in the process of developing its strategy and securing funding to develop a delivery plan for the Regional Park. We are however currently engaged in the delivery of a series of strategic projects which have an influence on your review sites.

Wandle Trail and Gateways.

We have a developed brand for the Wandle Valley and have been installing this in our Gateway projects in the regional park.

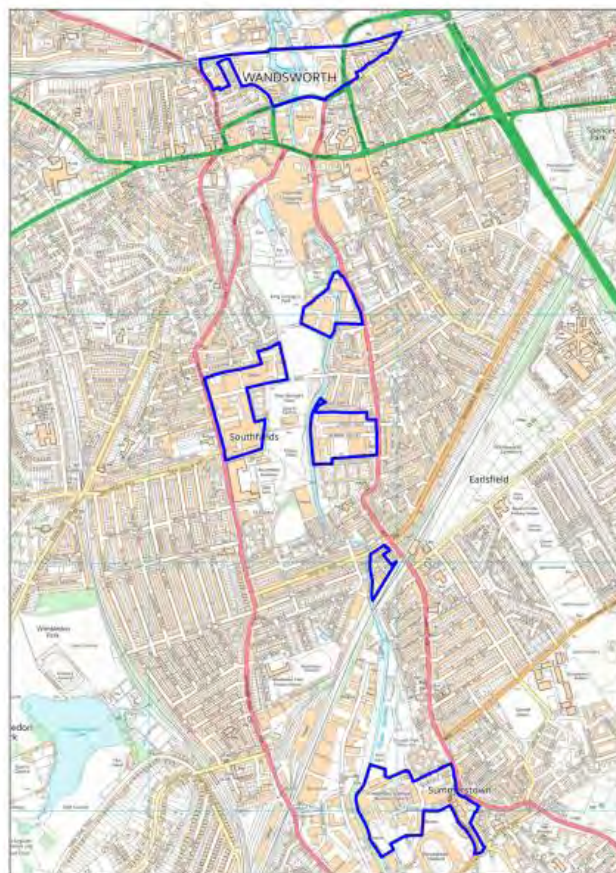
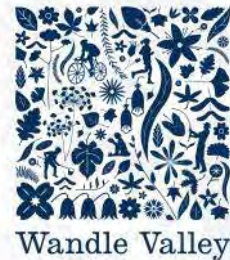
We have a developed scheme in Wandsworth with secured capital funding for Gateway improvements at Trewint Street and plan to implement in January 2107. This forms part of a larger Wandle Valley program.

[REDACTED] program as a means to enhance and develop more pedestrian and [REDACTED] the river, to improve health and wellbeing and act to mitigate against [REDACTED] flooding hinterland of the river through the use of SUDS, swales and permeable surfaces.

This will be of particular relevance in the sites in the Delta area and Summerstown as development here will also be impacted by the development to the former greyhound stadium and is already prone to flooding and traffic congestion.



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London
SM4 5JD



I trust that we will have the opportunity to further discuss this and other potential for the Trusts involvement in the consultation of this land review, and I look forward to hearing from you.

Kind regards



Sue Morgan



Registered Address: 4th Floor Tuition House, 27/37 St George's Road, Wimbledon, London, SW19 4EU

Charity Number: 1152818 Company Number: 08146794 VAT:167614294

WANDSWORTH LOCAL PLAN

EMPLOYMENT AND INDUSTRY REVIEW – POLICY OPTIONS DOCUMENT (OCTOBER 2016)

REPRESENTATIONS ON BEHALF OF THE WESTERN RIVERSIDE WASTE AUTHORITY

Introduction

1. These representations are submitted on behalf of the Western Waste Riverside Authority (WRWA) to the consultation by the London Borough of Wandsworth (LBW) to the Employment and Industry Review – Policy Options Document (October 2016).
2. We introduce the WRWA and provide important background before setting out the WRWA's response to each relevant question.
3. The role of the WRWA, the changes to existing facilities and future operations provide the evidence base and justification to these representations.

WRWA and background information

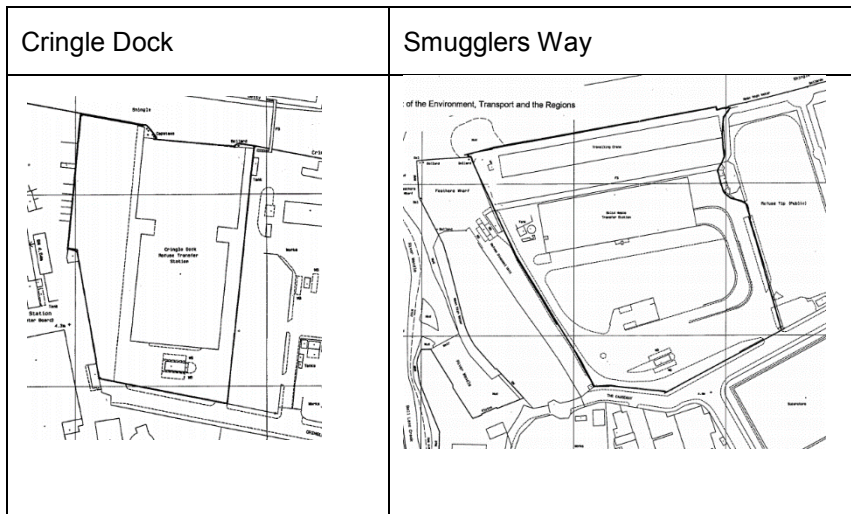
4. The WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. WRWA is responsible for managing the waste collected in the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea.
5. WRWA and its constituent councils are responsible for the collection, recycling, composting and treatment of some 391,000 tonnes per annum of household and commercial waste generated within their boundaries. The provision of this service involves a number of different activities that make up the provision of a waste management service.
6. The Authority has pursued a progressive and innovative approach to waste management that is waste minimisation and recycling-led, whilst utilising the River Thames for bulk transportation. Working in cooperation with each other and the private and not-for-profit sectors, the Authority and its constituent councils have focussed on the needs of residents to provide a sustainable waste management service that should set a precedent for future waste management developments in London.
7. In May 2002 WRWA entered into a long-term contract, known as the Waste Management Services Agreement (WMSA), with Cory Environmental Limited (hereafter referred to as Cory). This contract is helping WRWA to realise its aim of maximising reuse and recycling and providing a greener future for management of its waste. The waste management services provided by WRWA and Cory involve waste and recyclable material being delivered to the Authority's two transfer stations, at Smugglers Way in Wandsworth and Cringle Dock in Battersea, for either reuse, recycling or treatment. These are the two main facilities within LBW.
8. Western Riverside Transfer Station at Smugglers Way can handle over 6,500 tonnes of waste and recyclables per week. WRWA's second transfer station, Cringle Dock, is located next to Battersea Power Station and can handle over 6,000 tonnes of waste and recyclables every week. Whereas Smugglers Way uses state-of-the art technology in waste containerisation and operates efficiently and to the highest environmental standards, Cringle Dock is a dated facility which is why its redevelopment has been pursued by the WRWA and we explain more of this later. Cory takes advantage of spare capacity at the transfer stations for the receipt of local trade and commercial waste. WRWA also currently provides an integral Household Waste and Recycling Centre at the Smugglers Way site.

9. WRWA receives co-mingled and separated recyclables at its transfer stations and a Materials Recycling Facility (MRF) was constructed at Smugglers Way in 2010/11, so that most of the separation and baling process is now carried out on site and the baled materials are then transported on to their various market outlets elsewhere in the UK or abroad. Green Waste collected kerbside by the constituent councils and at WRWA's Household Waste and Recycling Centres is bulked at the transfer stations for onward transportation to a number of centralised composting facilities within, or just outside, the London area. All of the waste that cannot be reused or recycled is compacted into containers before being loaded onto barges for their onward river journey.
10. Historically, this was to Cory's landfill site located on the Thames Estuary at Mucking, Essex, but since the completion of the Riverside Resource Recovery Limited's (RRRL) Energy from Waste Facility at Belvedere, in the London Borough of Bexley, the waste has been used for energy recovery and the Authority is now sending "zero waste" direct to landfill and is generating enough electricity to power over 100,000 homes. This Facility will, for decades to come, ensure a secure and environmentally sound treatment method for that portion of waste which cannot be reused or recycled.
11. Cringle Dock and Smugglers Way are one a number of Safeguarded Wharves located on the River Thames allocated for the handling of cargo by barge. Cringle Dock is one of London's key waste infrastructure sites and now transfers around 260,000 tonnes a year, or 5,000 tonnes each week, of 'black bag' waste – an amount equivalent to one quarter of that produced in the whole of Wales – which demonstrates Cringle Dock's importance as a strategic public asset.
12. Cringle Dock has operated as a waste transfer station since 1972 and is protected by planning policies contained in the London Plan 2011 and Wandsworth Council's Core Strategy. These policies require that any development adjacent to a safeguarded wharf must minimise the potential for conflicts of use and disturbance.
13. Recent planning decisions have released industrial sites, such as Battersea Power Station in the Vauxhall Nine Elms Battersea area of London where Cringle Dock is situated, to be redeveloped for mixed residential, commercial, retail and leisure complex uses. The existing waste transfer station at Cringle Dock does not sit comfortably with the new surrounding land uses. The transfer station is over 40 years old and architecturally very much out of keeping with the proposed new developments. Furthermore, the current operational design of the waste transfer station is based around waste storage bunkers; whilst functional, the open air system can, on occasion, emit odour nuisances.
14. Despite its Safeguarded Wharf status, without redevelopment, the arrival of a large number of residents, workers and visitors to the area would undoubtedly have caused issues that could seriously impinge on the operations at Cringle Dock.
15. As a result, since 2012, the Authority had discussed with the owners of Battersea Power Station what could be done to safeguard the long-term operation of Cringle Dock, by improving it operationally and visually and thereby reducing the potential for conflict with its new neighbours and contributing towards the strategic regeneration of the area generally. The outcome of a joint design exercise was a proposal to redevelop Cringle Dock that met future operational waste needs with a design that is both safer and operationally very much more resilient than the current operation. It included the building of residential accommodation facing the Thames with the new Cringle Dock facility below it, which will use modern equipment and processes to continue operations with much greater control over environmental issues.
16. The planning application for the proposed new facility was submitted to LBW in November 2015 and, in February 2016, planning permission was granted.

17. It is anticipated that Cringle Dock will now blend seamlessly into the masterplan for the whole Vauxhall Nine Elms Battersea area whilst continuing to provide a safe and secure waste management solution for the foreseeable future.
18. As part of the changes proposed at Cringle Dock, it is important to understand that WRWA currently operates from the site a bulk waste transfer station (BWTS) which receives and bulks up green waste and recyclables. The facility comprises a combination of open bays and an ageing temporary transfer building. The materials brought to the BWTS are generated by the public delivering bulky waste and recyclables to the Household Waste Recycling Centre at Smugglers Way and by local businesses.
19. However, as a result of the proposed redevelopment of Cringle Dock detailed above, plans for the relocation of the BWTS have now been developed. These proposals involve replacing the Cringle Dock facility with a new modern BTWS at Feathers Wharf, Smugglers Way. This will assist in the logistics of any upgrade or redevelopment of Cringle Dock, by vacating land that could accommodate a temporary waste transfer facility to allow uninterrupted operation of the facility during any works to the existing wharf.
20. Much of the material currently managed at the Cringle Dock BWTS originates from the WRWA Smugglers Way facilities. Moving the facility to Feathers Wharf, Smugglers Way will remove another 2,200 HGV vehicles journeys each year from London's roads. The scheme makes beneficial use of an operational site at Feathers Wharf and provides for effective integration of related operations which have previously been carried out on different sites. The proposed operation will therefore complement the existing waste management functions at the Smugglers Way site, with beneficial utilisation of existing site access and on-site infrastructure (weighbridges, internal roads and traffic control system).
21. In September 2015 a planning application was submitted to LBW to construct a new Bulk Waste Transfer station, to handle up to 25,000 tonnes of recyclable materials, on the southern part of the Feathers Wharf. In February 2016 planning permission was received for an eight year period, commencing on operation.
22. The proposals provide a comprehensive scheme which combines the proposed BTWS with a current temporary permission for plant storage; with each having an independent access and haul road. The whole Feathers Wharf site will be upgraded by providing a new good quality BWTS building together with substantial new landscaping and biodiversity measures as well as a new public riverside walkway.
23. The proposed walkway is an exciting scheme to open up the river easement zone along the River Wandle and the River Thames, as a public walkway. This also involves a significant refurbishment of the existing unused high level walkway which runs along the northern side of the existing Smugglers Way facility. This will connect up the existing riverside walkways to the east and west which will allow the public to walk along the riverside.
24. The waste management contract awarded to Cory runs until 2032 and there is a shortfall between the end of the contract and the end of the temporary planning permission (2024). Although temporary consent was granted, it is likely that the WRWA will continue to have an operational need for this land beyond 2024 as part of its statutory duty to provide waste management services across the four boroughs.

Safeguarded Wharves

25. As noted, both Cringle Dock and Smugglers Way are Protected Wharves. The boundaries of each are identified on the plans below:



26. Safeguarding policy transferred to the Mayor of London from the Secretary of State in 2000. The Mayor reviewed the original 1997 list of wharves in conjunction with the Port of London Authority (PLA) and concluded that Cringle Dock and Smugglers Way should retain their protected status. No changes were made to the boundary of either.
27. The requirement is to refer any proposed planning approval within the defined boundary to the Mayor.
28. The Mayor undertook a review of protected wharves in 2011/2013. In respect of Smugglers Wharf, the recommendation was that:
- “Retain – Site is in active use, with dedicated infrastructure to serve the current user. GLA and PLA consider working with relevant stakeholders, including the waste authority and operator, to explore options for increasing the use of river transport for materials, including recyclates, through this site.”*
29. In respect of Cringle Dock, the recommendation was that:
- “Retain – Site is in active use, within specialist infrastructure, which enables the waste transfer activities to take place in a covered dock. GLA and PLA are working with relevant stakeholders, including the Council and local developers, to ensure that the redevelopment of the wider Battersea/Nine Elms areas provides a suitable road network to service this wharf and does not reduce the viability of the site as a river freight wharf. In February 2013 Thames Water submitted a Decision Consent Order to the Planning Inspectorate which included an application for the neighbouring Kirtling Wharf site as a construction site for the Thames Tideway Tunnel. Navigational access will need to be maintained during the construction period.”*

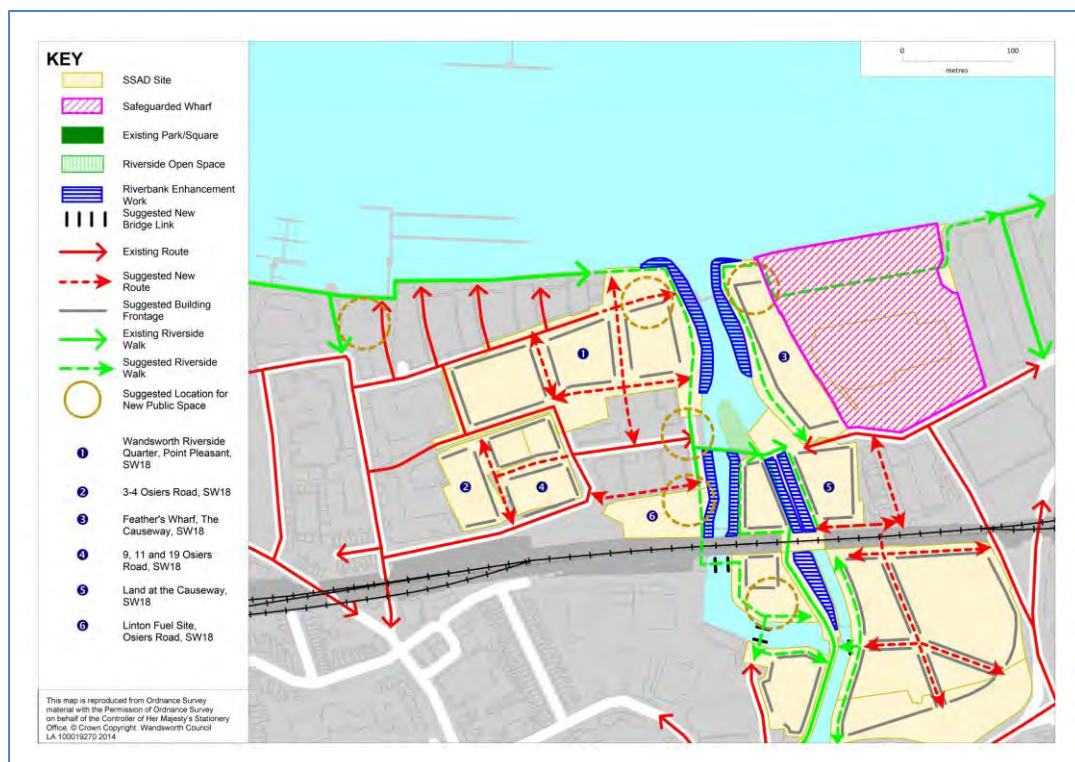
WRWA Waste Management Policy

30. The WRWA's Waste Management Policy objectives are to:
- embrace the concepts of waste prevention;
 - seek to achieve a sustained reduction in the amount of waste arising;
 - minimise the use of landfill;
 - increase, as far as is practicably possible, the amount of waste that is reused, recycled and composted;
 - recover energy from waste that cannot be recycled or composted;
 - maximise the use of sustainable river transport;
 - assist in achieving regional self sufficiency for the London area;
 - minimise disruption to others and involve a "good neighbour" approach to the management of waste facilities; and
 - represent all round Best Value for the local community without excessive cost.
31. In pursuit of these objectives, as noted, Cory's contract runs to 2032.

Response to 8.4.4 Area Spatial Strategies and Site Allocations

32. The WRWA questions whether a public space (see Map 8.8 reproduced below) on Feathers Wharf, immediately adjacent to a waste transfer station and Safeguarded Wharf, is appropriate. A river walk, where people pass through, is a very different environment to a public space which might lead to unreasonable expectations for peace and quiet which are most unlikely to be met on land next to an operational facility.
33. Therefore, for these reasons, the WRWA would respond No and Yes to 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?"

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



Response to 8.9 E19 (Waste and Wharves)

34. The draft notes that 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 suggested by LBW that it is 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 (para 8.97).
35. WRWA notes that part of the justification for this is a reference to the ongoing consultation exercise to the London Plan (A City for All Londoners, October 2016). However the GLA do not reference a review of protected wharves within the consultation document and there is no commitment to this, and therefore it would be a missed opportunity if LBW does not take the opportunity now to review the extent, role and function of waste management facilities within the borough linked to the ongoing wider regeneration of the Vauxhall Nine Elms Battersea and Wandle Delta areas.
36. As we have explained, there have been important changes to facilities and operations at Smugglers Way and Cringle Dock, and with the WRWA's ongoing commitment to waste management across all 4 boroughs, it is appropriate to run the reviews concurrently. It must be the case that the opportunity is taken to review planning policy and allocations in LBW that could impact on the WRWA's ability to perform its statutory duty.
37. In response to the questions set out in the document, the WRWA responds as follows:
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
38. The WRWA proposes that the review should happen now. Whilst Core Strategy Policy PL 10 sets out the need for land to be reserved for the Borough's future waste management needs, the WRWA is concerned that other planning decisions relating to development plan documents and individual planning applications would appear to be undermining Policy PL 10, and therefore the WRWA considers there to be a need for the review to be completed now.
39. As indicated, the WRWA is committed to serving the needs of the borough and has placed a contract for waste management until 2032. Given the pressures for housing development and the implications for future operations, in particular at Smugglers Way, the WRWA considers it essential that there is a review of policy and that it happens in full and now.
Question 64 – should the sites allocated for waste management be retained, as set out in the adopted SSAD?
40. The WRWA proposed that the sites should be retained, but there should be a review of the boundary of the extent of the facilities. It is acknowledged that this is a matter for the GLA to lead on, however given the changes around Cringle Dock and Smugglers Way arising from decisions being made on planning applications and development plan documents, it is right that LBW considers this now.
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
41. In light of the WRWA's response to Questions 63 & 64, the WRWA proposes that the review should take place now.
42. Finally, the WRWA confirms its availability to meet the policy team to discuss further these representations.

CB/CC/P6132
4th November 2016

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sirs,

London Borough of Wandsworth Local Plan – Employment and Industry Review – Policy Options (November 2016)

We write on behalf of our client, Workspace Group PLC, to make representations to the London Borough of Wandsworth's Local Plan 'Employment and Industry Review – Policy Options' with particular reference to the following site:

- Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS

We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.

We had previously submitted a representation for the site in the Employment and Industry Review in December 2015. We now write to address specific questions outlined in the latest employment and industry review.

We wish to highlight that Workspace Group PLC have a number of other business centres in the Borough including Wandsworth Business Village (now known as The Lightbulb) which offers brand new studio for new and growing businesses and Morie Street Business Centre which an office development located just 200m from Wandsworth Town mainline station.

Our client is principally concerned with the future planning policy approach to the provision of new business space (particularly SME - small and medium enterprises - accommodation) and the rejuvenation of existing employment areas. In particular, our client is keen to highlight to the Council that the current SME market for business accommodation is rapidly changing, with SME's requiring smaller, more flexible and diverse business centres which foster a sense of community and install an important live-work balance – gone are the days of sole employment led buildings which comprise of little support uses which employees require (retail, cafes, and local services).

As a result, our client is of the view that a fresh policy approach is now necessary to support the growing Wandsworth SME business sector – which recognises the unique nature and requirements

Architecture Planning Interiors

Old Church Court, Claylands Road, The Oval, London SW8 1NZ

T 020 7556 1500

www.rolfe-judd.co.uk

DD 020 7556 1500

E chrisb@rolfe-judd.co.uk

of the SME market. Our client is therefore keen to work with the Council and input into the Local Plan employment and industrial review.

We would therefore welcome the opportunity to meet with the Council (and the appointed Consultants) to share information on the Workspace site (identified above) and tenant base.

Background to Workspace

Workspace Group is a specialised property based business that provides office, studio and light industrial workspace for predominantly small and medium sized enterprises (SMEs) – usually falling within Class B1. Workspace provides good value, small unit employment accommodation for rent in London and the South East and manages over 5.7 million sq ft of accommodation across 100+ estates in London, with more than 4,000 tenants. As such, Workspace provides a significant contribution to London's economy and has first-hand experience of the changes in property market conditions.

Workspace has increased the range of units on offer and tenant diversity, whilst providing economies of scale in terms of management and marketing. The result is a substantial and diverse portfolio, able to meet the needs of London's dynamic small business community. Workspace's dynamic tenant mix was exemplified by a recent survey (by Cambridge Economic Associates) of the businesses/tenants at Workspace's Kennington Park Business Centre which highlighted the following:

- The typical market sectors of businesses choosing to locate at Workspace centre by business sector was found to be: Business Professional Service (30%); Creative Industries (20%); Community Health & Education (18%); Charity, Voluntary and Professional (12%); Manufacturing (5%); Catering (2%); Government and Public Sector (2%);
- half of businesses were start-ups (7%) or young companies producing and selling their first product or service (43%)
- availability of affordable/low cost space, good transport links, good IT and communications infrastructure and availability of accommodation where key attractions to businesses locating at Workspace business centres;
- proximity to customer and clients and the location in relation to the founder/director home was a significant driver in the location of businesses;
- also 77% of employees of businesses at a Workspace site live within 10 miles of the centre;

The survey also highlighted the important local benefits for communities and businesses arising from a Workspace business centre. Firms in the business centre were trading 22% of their turnover with each other (illustrating the collaborative impact of Workspace's model) with 58% of all business taking place within London. In the case of the Kennington Business Centre, the site was found to generate an estimated 1,350 jobs which directly contributed £50million of GVA to Lambeth's economy each year.

Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan. In order to do this, some of their older premises will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high value economic driver will be necessary to enable redevelopment and ensure the overall viability of regeneration. Small and Medium sized enterprises must be given the chance to thrive in appropriate locations which provide affordable space, good transport links, strong IT infrastructure and a variety of other suitable facilities which support these businesses.

Over the years Workspace Group have developed specific commercial knowledge on how businesses want to operate and the environment they need to flourish; understanding specifically the

changing needs of SMEs and actively adapting and managing their business centres to create an environment for growth and innovation. To drive forward their regeneration programme Workspace Group are working with local planning authorities throughout London to assist with the formulation of new planning policy within Local Development Frameworks, particularly in relation to new policy targeted at the improvement/regeneration of business space.

Workspace – Model for Business Regeneration

Workspace Group's regeneration model is simple. Where the existing premises are no longer environmentally or physically viable, the aim is to replace them with modern business accommodation, offering flexible leases which are targeted specifically to SMEs and do not subject them to long term financial commitments. In some cases, the improvement/renewal of an estate can be achieved via relatively low-key refurbishment/modernisation programmes. However, where the existing building stock is old and physically unsound, it is often necessary to pursue a more comprehensive redevelopment solution. The key to both approaches is the delivery of flexible supporting uses on site which enhance the business community.

Workspace would like to see this model expanded further across its existing stock to support existing tenants and increase the delivery of business accommodation across all sites. Ensuring this, two alternative site base scenarios are required:

Increased Flexibility and Adaptation of Existing Business and Employment Sites:

The modern SME market requires well managed, modern, flexible B1 space, offered with flexible lease arrangements. Space should also be flexible/adaptable, but importantly offer businesses supporting services to build a strong business community. This includes the incorporation of communal areas, supportive retail opportunities (eg. printing services, specialist stationary providers, and convenience shops) and small opportunity for interesting restaurant and cafes uses to allow daytime and evening employee resting spaces. These requirements cannot often be met within the older estates.

Hence, Workspace Group's is focused on providing new floor space which is specifically designed to promote, support and accommodate SMEs, incorporating the following:

- flexible and adaptable – new business space is typically designed on a flexible grid arrangement to enable a variety of unit sizes to be achieved.
- capable of accommodating a range of businesses and uses – often business centres will accommodate a diverse range of businesses and activities.
- providing a range of services/telecom internally within the space – including broadband, telecommunications, data cabling and utility services.
- providing a high profile reception area – a 'front door' is important to all Workspace customers.
- incorporating sustainable design features within new buildings.
- promoting the use of energy efficiency and renewable energy technologies.
- including communal facilities for customer use – in addition to the main reception, new business centres will often provide modern communal meeting rooms, a café, toilet facilities, shower room etc.
- incorporating new waste disposal and recycling facilities – new tenants are encouraged to recycle waste materials and adopt a sustainable working practice;
- providing comprehensive site security – ensuring new business space meets disabled access requirements and adopting a high quality and distinctive architectural approach to all new development;

- providing a range of support uses (including café/restaurants, leisure/gym uses, retail space, healthcare etc.) within new business centres to service the tenant base and their employees, to add to the amenity offer and to create vibrancy and a community feel.

Workspace considers the above approach is necessary to reflect the growing change occurring in SME business space and can be suitably adapted across most existing employment sites. The current Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIA) designation and associate protection for industrial uses only is now out-of-date in light of changing operational habits of SMEs. Workspace have found a growing demand from tenants to include flexibility and supportive services on site to help prosper business communities and encourage a suitable work-live balance.

Regeneration/redevelopment of Sites with Supporting Uses

Given the relatively low open market rents for modern SME space across London, Workspace Group has found that in certain circumstances the replacement/regeneration of the historic business space will only be viable/achievable either through significantly increasing the business accommodation provided at the site or via an integrated mixed-use development (incorporating higher value uses such as residential and local retail - which will effectively act as an enabling development to subsidise the provision of the replacement business space).

It must be recognised that the renewal/regeneration/improvement of older business centres is only likely to be achievable/viable if the above model is incorporated to allow for supporting mixed-uses on existing sites, which allows higher value uses (such as residential, retail etc) to act as an enabler.

This model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio. Indeed, as the Council will be aware, the recently completed redevelopment of the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. The residential and non-B1 components of the scheme cross-subsidised the replacement of the existing (and largely out-moded) business space at the site with a new 'flexibly designed' business centre. The scheme also provided wider improvements to the Hardwicks Quarter).

Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS

Havelock Terrace forms a small part of the Queenstown Road Significant Industrial Area (SIL). The site is completely separated from the bulk of the SIL designation by the railway network 60metres to south of the site. This isolated section of SIL generally comprises light industrial units across the southern third, whilst the office, studio and workshops of our client's Havelock Terrace site occupies the middle third, and the northern third offers offices, commercial units and two public houses. The northern third of the site appears to have been removed from the SIL designation in the 2nd proposed Submission (2014). It would therefore stand to reason that, at the very least; our client's site will need to be granted flexibility in the permitted uses on site in order to negate a conflict of uses with the neighbouring site.

The western boundary of the Stewarts Road Industrial area (which is within the Queenstown Road SIL) is identified on the Nine Elms Spatial Strategy Diagram in the SSAD and on the Proposals Map as an area appropriate for Industrial Business Park uses. The Council commissioned the Stewarts Road Study (URS, 2010), which identified potential strategies for the area to improve access and facilitate its further consolidation and intensification, while mitigating its impact on adjacent residential areas. Improved access is identified both from Battersea Park Road (via Havelock Terrace), Queenstown Road and Wandsworth Road. The same report highlighted the Havelock Terrace area as an area suitable for 'On-going Mixed Industrial-Type Employment Uses'. This description fits with

Workspace's vision for SMEs occupying the site. Therefore it is clear that that Council will find it beneficial to work closely with Workspace in order to facilitate the successful execution of the various objectives.

Below we have answered consultation questions which are pertinent to our client's site.

Question 1

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

We consider the 'Low Growth' scenario should be planned for. The supply and demand exercise already acknowledges that the forecast demand for industrial land is below the existing provision. The study also recommended that 17.5hectares of industrial land may be lost however it acknowledges that the loss needs to be weighed against the wider planning benefits on the sites.

The London Industrial Land Supply & Economy Study 2015 states that the rate of release from 2010 to 2015 is 105ha per annum compared with the SPG-recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. The document considers the current rates to be excessive and a more moderate rate of release would be appropriate instead. However the report acknowledges that Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%. These findings clearly suggest that the employment densities are increasing in the remaining industrial areas.

The study also concluded that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. The study puts forward mechanisms which would allow this flexibility, namely the potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield), and the potential for intensification on existing land. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

Uncertainty surrounding Britain's decision to leave the European Union has also raised uncertainty regarding these growth scenarios and how to address the short, medium and long term impacts of this decision on the industrial market. Our client considers that a reflexive policy approach will be necessary in order to allow for land owners and tenants to adapt accordingly.

Question 2

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

There is still much speculation surrounding the impact of Britain's decision to leave the EU. It is still unclear whether there will be a 'hard' or 'soft Brexit' and what form trade relationships will take with the EU and internationally. AECOM's Employment Land and Premises Study (2016) for Wandsworth states that the vote is likely to have a significant effect on the economic growth trajectory over the short to medium term but it is less clear what effect Brexit will have on the long term. This poses a significant problem for this Employment and Industry review which is required to take a long term view. AECOM's study advises that the Borough should monitor the demand for land and premises against the long term strategic aspirations and respond, not to short term effects and consequences of Brexit, but to the long term strategic position and balance of supply and demand.

Meanwhile the short to medium term impacts may still cause issues for the plan; for example, AECOM note that a fall in sterling has made the UK a more competitive area to manufacture which

could drive demand, but ahead of new trade deals being negotiated international companies could be cautious of investing in the UK, and existing businesses may not look to expand.

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?

The Strategic Objectives outlined in Section 6 fail to acknowledge the importance of intensification on existing industrial sites. Recommendation 5 of the ELPS states the following:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation directly references our client's Havelock Terrace site, the reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. This recommendation is not reflected in the Spatial Vision or Strategic Objectives and should be incorporated. Despite the intensification of employment sites being raised in relation to the plan's SILs, LSIA's, MUFIEAs and Employment Intensification Areas; the theme is not given weight by the Strategic Objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land. For these reasons, we consider that the intensification of employment sites should be one of the tenants of new Plan's Strategic Objectives.

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?

Our client supports the appropriate protection of Wandsworth's Industrial Areas through the use of suitable industrial designations.

In our previous representation we made the point that Policy DMI1 of the DMPD appears counter intuitive as it affords the same blanket protection to both SILs and LSIA's when they are both different designations with different characters and uses. Equally it does not seem logical to safeguard land which falls under each designation even if it is not suitable for that use or in poor state. In line with the London Plan, we are of the opinion that consolidation of both SILs and LSIA's strengthens the designation as a whole. De-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land.

Recommendation 5 of AECOM's ELPS report strongly encourages the intensification of a portion of the Queenstown Road SIL at Havelock Terrace in which our client's site is situated. The ELPS advises that the cluster should include higher density employment uses (e.g. B1a/b) through designation as an Industrial Business Park (IBP). The appropriateness of the IBP designation is discussed in our responses to Questions 48 and 49 but the principle of providing a greater density of development in this area apposite and logical. The ELPS notes that although the area is considered typical of the character found elsewhere in the SIL, it juts out from the core area of the SIL being the only portion located north of the railway lines into Vauxhall/London Waterloo, and thus is to some degree separated from it. Having its own access road, it experiences less of the access and permeability issues encountered in other parts of the SIL. Given this, the ELPS recommends that the Council explore further the possibility of changing the designation of Havelock Terrace.

The Council must continue to acknowledge the need for the Council to work collaboratively with developers and land-owners to produce comprehensive regeneration of both SILs and LSIA's where necessary. Policy 4.10 Part A(c) (New and Emerging Economic Sectors) of the FALP states that Council must work with developers and businesses to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space'.

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?

Havelock Terrace forms a small part of the Queenstown Road Significant Industrial Area (SIL). The site is completely separated from the bulk of the SIL designation by the railway network 60metres to south of the site. This isolated section of SIL generally comprises light industrial units across the southern third, whilst the offices, studios and workshops of our client's Havelock Terrace site occupies the middle third, and the northern third offers offices, commercial units and two public houses. The northern third of the site appears to have been removed from the SIL designation in the 2nd proposed Submission (2014). It would therefore stand to reason that, at the very least; our client's site will need to be granted flexibility in the permitted uses on site in order to negate a conflict of uses with the neighbouring site.

The western boundary of the Stewarts Road Industrial area (which is within the Queenstown Road SIL) is identified on the Nine Elms Spatial Strategy Diagram in the SSAD and on the Proposals Map as an area appropriate for Industrial Business Park uses. The Council commissioned the Stewarts Road Study (URS, 2010), which identified potential strategies for the area to improve access and facilitate its further consolidation and intensification, while mitigating its impact on adjacent residential areas. Improved access is identified both from Battersea Park Road (via Havelock Terrace), Queenstown Road and Wandsworth Road. The same report highlighted the Havelock Terrace area as an area suitable for 'On-going Mixed Industrial-Type Employment Uses'. This description fits with Workspace's vision for SMEs occupying the site. Therefore it is clear that the Council will find it beneficial to work closely with Workspace in order to facilitate the successful execution of the various objectives. Our answer to Question 49 has addressed this in more detail.

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?

No. Our client is supporting the low growth scenario as we consider the predicted provision will meet demand.

The sites put forward for re-designations should not be retained for industrial and distribution uses. These sites have all been recommended for re-designation following the detailed ELPS conducted by AECOM.

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?

Wandsworth have failed to emphasise the importance of intensifying their industrial uses across all designations. SILs, LSIA and MUFIEAs despite the recommendations of the ELPS report and the London Industrial Land Supply & Economy Study 2015. Recommendation 5 of the ELPS states:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation only references our client's Havelock Terrace site, the reasoning behind it is to encourage higher densities in accessible locations to achieve strategic objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land.

The London Industrial Land Supply & Economy Study 2015 goes on to suggest that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. Key mechanisms allowing this include potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield). Going forward, London appears to be heading towards a situation in which most of its activities located in industrial areas will be associated with servicing the rest of London's economy and population. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

The rate of release for 2010 to 2015 is 105ha per annum compared with the SPG recommended rate of release of 36.6ha per annum. The Council must carefully consider what the impact of this continued decline in industrial land will have the form of its industrial areas. Once combined with the uncertainty fuelled by Brexit, the Council finds itself in a difficult position going forward. We consider that increased flexibility and promotion of higher density developments within the existing designated industrial is prudent for Wandsworth.

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?

We consider that the Local Plan could continue to outline high level of design requirements expected from developments however rent level, leasing and management may fall outside of the planning requirement. These should avoid being overly prescriptive by allowing for flexibility in order to attract and accommodate a wide range of employment opportunities.

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?

The consideration and demonstration of employment and residential uses complementing each other is already a key test within any mixed-use planning application. The relationship between residential and employment uses needs to ensure they work in harmony both physically and operationally.

Question 41

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

We do not agree that affordable creative workspace should be addressed in a prescriptive manner, for large scale developments or otherwise. We consider the requirement for 'affordable workspace' may actually restrict certain developments which already have to meet a wide range of policy requirements, including affordable housing. There is also uncertainty regarding the definition of 'Affordable Workspace' and what it would actually comprise.

Our client considers that their 'Workspace' business plan is already an 'affordable' business offer but it should not become prescriptive within policy as it needs to remain flexible.

Our client, Workspace cater to the modern SME market which requires well managed, modern, flexible B1 space, offered with flexible lease arrangements. The business plan providing rolling leases which can be adapted as the businesses grow. The floorspace are flexible and can be increased in size when needed. The rents are reasonable for starter businesses. Given the relatively low open market rents for modern SME space across London, Workspace Group has found that in certain circumstances the replacement/regeneration of the historic business space will only be viable/achievable either through significantly increasing the business accommodation provided at the site or via an integrated mixed-use development (incorporating higher value uses such as residential and local retail - which will effectively act as an enabling development to subsidise the provision of the replacement business space).

This model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio including the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. Our client already succeeds in meeting the provisions of DMPD Policy DMI4 by providing flexible leasing agreements and realistic rents. Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan, however an overly prescriptive approach from the Local Authority could threaten to disrupt our client's successful model.

Question 42

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

See above answer to Q41

Question 43

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

See above answer to Q41

Question 48

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

Our client would welcome the re-designation of their site in Havelock Terrace from a Preferred Industrial Location (PIL) to an Industrial Business Park (IBP) within the Queenstown Road SIL. An IBP would complement our client's existing business plan of attracting flexible B1 business space for SMEs.

The designation of the western edge of the Queenstown Road SIL as an IBP was recommended in the Stewarts Road Study (URS, 2010) in order to provide a buffer zone between the residential area to the west and the heavier industries in the remainder of the area, in expectation that these heavier industrial uses would be intensified. It appears that the Council are using this justification in the same way for Havelock Terrace and creating a buffer of 'softer' industrial uses. This raises the potential for the site to be assigned a different designation. We have addressed this in more detail for Question 49.

Question 49

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

Havelock Terrace forms a small part of the Queenstown Road Significant Industrial Area (SIL). The site is completely separated from the bulk of the SIL designation by the railway network 60metres to south of the site. This isolated section of SIL generally comprises light industrial units across the southern third, whilst the office, studio and workshops of our client's Havelock Terrace site occupies the middle third, and the northern third offers offices, commercial units and two public houses. The northern third of the site appears to have been removed from the SIL designation in the 2nd proposed Submission (2014). It would therefore stand to reason that, at the very least; our client's site will need to be granted flexibility in the permitted uses on site in order to negate a conflict of uses with the neighbouring site.

Furthermore, the site immediately north of our site has recently come forward with a major application (2016/5422) for:

'Demolition of all existing buildings and construction of 4 buildings ranging from 9 to 18 storeys in height, comprising 174 residential units; office (B1) accommodation; drinking establishment (A4); flexible retail (A1/A2/A3) uses; car and cycle parking, servicing, refuse and associated plant; public realm improvements incidental to the development including the creation of a level threshold fronting Battersea Park Road and a new public route through the centre of the site; hard and soft landscaping works; infrastructure works and other associated works'

Whether it is approved or not, the application clearly demonstrates the residential aspirations for the neighbouring site. At present the site immediately abuts the SIL which could cause conflicts between the two uses. Therefore we argue that a more significant designation change is required to allow our client to adapt to the challenges posed by the neighbouring site.

The designation of the western edge of the Queenstown Road SIL as IBP was recommended in the Stewarts Road Study (URS, 2010) in order to provide a buffer zone between the residential area to the west and the heavier industries in the remainder of the area, in expectation that these heavier industrial uses would be intensified. It appears that the Council are using this justification in the same way for Havelock Terrace and creating a buffer of 'softer' industrial uses. However the ELPS already acknowledges that the site is already isolated from the core of the SIL.

We consider that our client's site should be granted a more flexible designation such as Mixed Use Former Industrial Employment Areas (MUFIEA) or Employment Intensification Area in order to facilitate the successful regeneration of the plot by Workspace. The property could be removed from its existing designation and cause no substantial harm to the integrity of the Queenstown Road SIL as a whole; the site is already on the periphery of the SIL designation and is physically isolated from the rest of the SIL by a series of railway lines. Removing the designation and/or including this site in

the emerging site allocation document would increase the flexibility of the site and still contain the SIL to the areas south of the railway.

Question 51

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

The London Plan requires Industrial Business Parks (IBPs) to have quality surroundings including research and development, light industrial and higher value general industrial units. As such, many of these uses do not conflict with residential uses to the same extent that factories or heavy industrial units would.

From our Client's perspective, it must be recognised that the renewal/regeneration/improvement of older business centres is only likely to be achievable/viable if the above model is incorporated to allow for supporting mixed-uses on existing sites, which allows higher value uses (such as residential, retail etc) to act as an enabler.

The consideration and demonstration of employment and residential uses complementing each other is already a key test within any mixed-use planning application. The relationship between residential and employment uses needs to ensure they work in harmony both physically and operationally.

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?

The London Industrial Land Supply & Economy Study 2015 states that the rate of release from 2010 to 2015 is 105ha per annum compared with the SPG-recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. The document considers the current rates to be excessive and a more moderate rate of release would be appropriate instead. However the report acknowledges that Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%. These findings clearly suggest that the employment densities are increasing in the remaining industrial areas.

The study also concluded that that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. The study puts forward mechanisms which would allow this flexibility, namely the potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield), and the potential for intensification on existing land. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

The business model of our client, Workspace PLC, has already proved to be very successful in regenerating run-down industrial buildings and replacing them with flexible light industrial workspace for predominantly small and medium sized enterprises (SMEs) – usually falling within Class B1. This greatly increases the employment density of the existing site.

The renewal/regeneration/improvement of older sites is only likely to be achievable/viable if the above model is incorporated to allow for supporting mixed-uses on existing sites, which allows higher value uses (such as residential, retail etc) to act as an enabler. The nature of such redevelopment

has positive effects on the overall quality of the site and the public realm.

Question 53

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

It is unrealistic to expect like-for-like reprovision of the existing uses on site when redeveloping SILs. Modern demands for particular types of flexible employment floorspace (suitable for SMEs, etc.), may call for a greater provision of particular uses. In the case of communal SME floorspace, the provision of non-industrial uses is often needed to serve the various tenants, thereby encouraging businesses to locate there and creating a strong business community.

Our client's business model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio. Indeed, as the Council will be aware, the recently completed redevelopment of the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. The residential and non-B1 components of the scheme cross-subsidised the replacement of the existing (and largely out-moded) business space at the site with a new 'flexibly designed' business centre. The scheme also provided wider improvements to the Hardwicks Quarter). We invite officers to visit The Lightbulb to see the success story first hand.

Through increasing the density of development, the reprovision of industrial floorspace is possible but the introduction of non-industrial uses are often required to act as enablers for redevelopment. It is unrealistic for the Council to expect full replacement provision of every use type in each scenario.

Summary

We trust the above response is of assistance and will enable our client's site to be reviewed in light of the responses. We would be more than happy to meet officers on site to discuss the key issues outlined above and our suggestions for the formulation of future policy.

We look forward to hearing your views in relation to the above in due course.

Yours faithfully,

Chris Brown

Chris Brown
Rolfe Judd Planning

CB/CC/P6132
4th November 2016

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sirs,

**London Borough of Wandsworth Local Plan
Employment and Industry Review – Policy Options Consultation Document (November 2016)**

We write on behalf of our client, Workspace Group PLC, to make representations to the London Borough of Wandsworth's Local Plan 'Employment and Industry Review – Policy Options' with particular reference to the following site:

- Riverside Business Centre, Haldane Place, Bendon Valley, London, SW18 4UQ

We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.

We had previously submitted a representation for the site in the Employment and Industry Review in December 2015. Our client is very pleased to see that latest policy options document identifies part of the site (The Former Bingo Hall, Bendon Valley) as an area for intensification and redevelopment. The document asks several questions which contemplate the decision to de-designate the site from an LSIA and which designation would be assigned going forward. On behalf of our client, we will address the relevant questions outlined in the latest employment and industry review.

We wish to highlight that Workspace Group PLC have a number of other business centres in the Borough including Wandsworth Business Village (now known as The Lightbulb) which offers brand new studio for new and growing businesses and Morie Street Business Centre which an office development located just 200m from Wandsworth Town mainline station.

Our client is principally concerned with the future planning policy approach to the provision of new business space (particularly SME - small and medium enterprises - accommodation) and the rejuvenation of existing employment areas. In particular, our client is keen to highlight to the Council that the current SME market for business accommodation is rapidly changing, with SME's requiring smaller, more flexible and diverse business centres which foster a sense of community and install an important live-work balance – gone are the days of sole employment led buildings which comprise of little support uses which employees require (retail, cafes, and local services).

Architecture Planning Interiors

Old Church Court, Claylands Road, The Oval, London SW8 1NZ

T 020 7556 1500

www.rolfe-judd.co.uk

DD 020 7556 1500
E chrisb@rolfe-judd.co.uk

As a result, our client is of the view that a fresh policy approach is now necessary to support the growing Wandsworth SME business sector – which recognises the unique nature and requirements of the SME market. Our client is therefore keen to work with the Council and input into the Local Plan employment and industrial review.

We would therefore welcome the opportunity to meet with the Council (and the appointed Consultants) to share information on the Workspace site (identified above) and tenant base.

Background to Workspace

Workspace Group is a specialised property based business that provides office, studio and light industrial workspace for predominantly small and medium sized enterprises (SMEs) – usually falling within Class B1. Workspace provides good value, small unit employment accommodation for rent in London and the South East and manages over 5.7 million sq ft of accommodation across 100+ estates in London, with more than 4,000 tenants. As such, Workspace provides a significant contribution to London's economy and has first-hand experience of the changes in property market conditions.

Workspace has increased the range of units on offer and tenant diversity, whilst providing economies of scale in terms of management and marketing. The result is a substantial and diverse portfolio, able to meet the needs of London's dynamic small business community. Workspace's dynamic tenant mix was exemplified by a recent survey (by Cambridge Economic Associates) of the businesses/tenants at Workspace's Kennington Park Business Centre which highlighted the following:

- The typical market sectors of businesses choosing to locate at Workspace centre by business sector was found to be: Business Professional Service (30%); Creative Industries (20%); Community Health & Education (18%); Charity, Voluntary and Professional (12%); Manufacturing (5%); Catering (2%); Government and Public Sector (2%);
- half of businesses were start-ups (7%) or young companies producing and selling their first product or service (43%)
- availability of affordable/low cost space, good transport links, good IT and communications infrastructure and availability of accommodation where key attractions to businesses locating at Workspace business centres;
- proximity to customer and clients and the location in relation to the founder/director home was a significant driver in the location of businesses;
- also 77% of employees of businesses at a Workspace site live within 10 miles of the centre;

The survey also highlighted the important local benefits for communities and businesses arising from a Workspace business centre. Firms in the business centre were trading 22% of their turnover with each other (illustrating the collaborative impact of Workspace's model) with 58% of all business taking place within London. In the case of the Kennington Business Centre, the site was found to generate an estimated 1,350 jobs which directly contributed £50million of GVA to Lambeth's economy each year.

Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan. In order to do this, some of their older premises will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high value economic driver will be necessary to enable redevelopment and ensure the overall viability of regeneration. Small and Medium sized enterprises must be given the chance to thrive in appropriate locations which provide affordable space, good transport links, strong IT infrastructure and a variety of other suitable facilities which support these businesses.

Over the years Workspace Group have developed specific commercial knowledge on how businesses want to operate and the environment they need to flourish; understanding specifically the changing needs of SMEs and actively adapting and managing their business centres to create an environment for growth and innovation. To drive forward their regeneration programme Workspace Group are working with local planning authorities throughout London to assist with the formulation of new planning policy within Local Development Frameworks, particularly in relation to new policy targeted at the improvement/regeneration of business space.

Workspace – Model for Business Regeneration

Workspace Group's regeneration model is simple. Where the existing premises are no longer environmentally or physically viable, the aim is to replace them with modern business accommodation, offering flexible leases which are targeted specifically to SMEs and do not subject them to long term financial commitments. In some cases, the improvement/renewal of an estate can be achieved via relatively low-key refurbishment/modernisation programmes. However, where the existing building stock is old and physically unsound, it is often necessary to pursue a more comprehensive redevelopment solution. The key to both approaches is the delivery of flexible supporting uses on site which enhance the business community.

Workspace would like to see this model expanded further across its existing stock to support existing tenants and increase the delivery of business accommodation across all sites. Ensuring this, two alternative site base scenarios are required:

Increased Flexibility and Adaptation of Existing Business and Employment Sites:

The modern SME market requires well managed, modern, flexible B1 space, offered with flexible lease arrangements. Space should also be flexible/adaptable, but importantly offer businesses supporting services to build a strong business community. This includes the incorporation of communal areas, supportive retail opportunities (eg. printing services, specialist stationary providers, and convenience shops) and small opportunity for interesting restaurant and cafes uses to allow daytime and evening employee resting spaces. These requirements cannot often be met within the older estates.

Hence, Workspace Group's is focused on providing new floor space which is specifically designed to promote, support and accommodate SMEs, incorporating the following:

- flexible and adaptable – new business space is typically designed on a flexible grid arrangement to enable a variety of unit sizes to be achieved.
- capable of accommodating a range of businesses and uses – often business centres will accommodate a diverse range of businesses and activities.
- providing a range of services/telecom internally within the space – including broadband, telecommunications, data cabling and utility services.
- providing a high profile reception area – a 'front door' is important to all Workspace customers.
- incorporating sustainable design features within new buildings.
- promoting the use of energy efficiency and renewable energy technologies.
- including communal facilities for customer use – in addition to the main reception, new business centres will often provide modern communal meeting rooms, a café, toilet facilities, shower room etc.
- incorporating new waste disposal and recycling facilities – new tenants are encouraged to recycle waste materials and adopt a sustainable working practice;

- providing comprehensive site security – ensuring new business space meets disabled access requirements and adopting a high quality and distinctive architectural approach to all new development;
- providing a range of support uses (including café/restaurants, leisure/gym uses, retail space, healthcare etc.) within new business centres to service the tenant base and their employees, to add to the amenity offer and to create vibrancy and a community feel.

Workspace considers the above approach is necessary to reflect the growing change occurring in SME business space and can be suitably adapted across most existing employment sites. The current Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIA) designation and associate protection for industrial uses only is now out-of-date in light of changing operational habits of SMEs. Workspace have found a growing demand from tenants to include flexibility and supportive services on site to help prosper business communities and encourage a suitable work-live balance.

Regeneration/redevelopment of Sites with Supporting Uses

Given the relatively low open market rents for modern SME space across London, Workspace Group has found that in certain circumstances the replacement/regeneration of the historic business space will only be viable/achievable either through significantly increasing the business accommodation provided at the site or via an integrated mixed-use development (incorporating higher value uses such as residential and local retail - which will effectively act as an enabling development to subsidise the provision of the replacement business space).

It must be recognised that the renewal/regeneration/improvement of older business centres is only likely to be achievable/viable if the above model is incorporated to allow for supporting mixed-uses on existing sites, which allows higher value uses (such as residential, retail etc) to act as an enabler.

This model is being applied to deliver the regeneration of a number of sites within the Workspace portfolio. Indeed, as the Council will be aware, the recently completed redevelopment of the Wandsworth Business Village (known as The Lightbulb) provides a modern 10,000sq.m Workspace business centre; - in tandem with 209 residential apartments, retail space, and a crèche. The residential and non-B1 components of the scheme cross-subsidised the replacement of the existing (and largely out-moded) business space at the site with a new 'flexibly designed' business centre. The scheme also provided wider improvements to the Hardwicks Quarter).

Riverside Business Centre, Haldane Place, Bendon Valley, London, SW18 4UQ

The site is located within the Bendon Valley LSIA. It is currently occupied by Workspace which lets light industrial and office units (B1c/B1a use), and the former Mecca Bingo building (now in use as a trampolining centre, Class D2) with a large car park to the rear and a Safestore (B8 use) fronting onto Garratt Lane. To the south and east is housing, to the north are industrial units which make up the remaining LSIA designation and to the west is the River Wandle and King George's Park.

The Employment and Industry Review: Policy Options document has identified the former bingo hall and its associated car park as an area within the LSIA which has the potential for new development and intensification. The document does not explicitly assign the area a new employment designation but does ask several questions which will inform the Council's decision. Below we have addressed all questions which are relevant to our client's site.

To support our client's representation in this process, and to demonstrate the aspirations for the former bingo hall and surrounding land, a high level masterplan has been prepared by AHMM Architects (copy enclosed). The masterplan sets out the existing site constraints (which include site

access, aged accommodation and physical barriers) and site opportunities (which include enhances employment accommodation, improved street scene, improved vehicular and pedestrian access, improved relationship with Garrett Lane, mixed use development).

Crucially these plan's also include the Riverside Business Centre to the west of the bingo Hall which has not been recommended for re-designation at this stage. In the questions below we address the reasons why the Council should consider de-designating this area.

Below we have answered consultation questions which are pertinent to our client's site.

Question 1

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

We consider the 'Low Growth' scenario should be planned for. The supply and demand exercise already acknowledges that the forecast demand for industrial land is below the existing provision. The study also recommended that 17.5hectares of industrial land may be lost however acknowledges that the loss needs to be weighed against the wider planning benefits on the sites.

The London Industrial Land Supply & Economy Study 2015 (prepared by AECOM) states that the rate of release from 2010 to 2015 is 105ha per annum compared with the SPG-recommended rate of release of 36.6ha per annum. If these trends continue then the total stock of industrial land in London will decline from around 6,980ha in 2015 by a further 2,300ha to around 4,700ha in 2041, a 33% decline over this period. The document considers the current rates to be excessive and a more moderate rate of release would be appropriate instead. However the report acknowledges that Industrial employment in London in the period 2010 to 2015 is estimated to have increased by around 4%. These findings clearly suggest that the employment densities are increasing in the remaining industrial areas.

The study also concluded that that overall there is a degree of flexibility in the industrial land market and industrial activities to respond to contractions in industrial land supply. The study puts forward mechanisms which would allow this flexibility, namely the potential for some industry to relocate to the wider adjacent South East (or in suitable cases further afield), and the potential for intensification on existing land. Therefore if sufficient industrial land can be provided / protected within and around London continued release of industrial land in London may be possible.

Uncertainty surrounding Britain's decision to leave the European Union has also raised uncertainty regarding these growth scenarios and how to address the short, medium and long term impacts of this decision on the industrial market. Our client considers that a reflexive policy approach will be necessary in order to allow for land owners and tenants to adapt accordingly.

Question 2

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

There is still much speculation surrounding the impact of Britain's decision to leave the EU. It is still unclear whether there will be a 'hard' or 'soft Brexit' and what form trade relationships will take with the EU and internationally. AECOM's Employment Land and Premises Study (2016) for Wandsworth states that the vote is likely to have a significant effect on the economic growth trajectory over the short to medium term but it is less clear what effect Brexit will have on the long term. This poses a significant problem for this Employment and Industry review which is required to take a long term view. AECOM's study advises that the Borough should monitor the demand for land and premises

against the long term strategic aspirations and respond, not to short term effects and consequences of Brexit, but to the long term strategic position and balance of supply and demand.

Meanwhile the short to medium term impacts may still cause issues for the plan; for example, AECOM note that a fall in sterling has made the UK a more competitive area to manufacture which could drive demand, but ahead of new trade deals being negotiated international companies could be cautious of investing in the UK, and existing businesses may not look to expand.

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?

The Strategic Objectives outlined in Section 6 fail to acknowledge the importance of intensification on existing industrial sites. Recommendation 5 of the ELPS states the following:

'R5 To help meet wider strategic objectives and promote higher density development at accessible locations the Council should consider promoting intensification of a portion of the Queenstown Road SIL (Cluster 1) at Havelock Terrace to include higher density employment uses (e.g. B1a/b) through designation as Industrial Business Park'

Although the recommendation only references the Havelock Terrace site, the reasoning behind the designation is to encourage higher densities in accessible locations to achieve strategic objectives. This recommendation is not reflected in the Spatial Vision or Strategic Objectives and should be incorporated. Despite the intensification of employment sites being raised in relation to the plan's SILs, LSIAs, MUFIEAs and Employment Intensification Areas; the theme is not given weight by the Strategic Objectives. The London Industrial Land Supply & Economy Study 2015 also acknowledges that there may be potential for intensification of industrial activities on existing land. For these reasons, we consider that the intensification of employment sites should be one of the tenants of new Plan's Strategic Objectives.

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?

Our client supports the "appropriate" protection of Wandsworth's Industrial Areas through the use of suitable industrial designations.

In our previous representation we made the point that Policy DMI1 of the DMPD appears counter intuitive as it affords the same blanket protection to both SILs and LSIAs when they are both different designations with different characters and uses. Equally it does not seem logical to safeguard land which falls under each designation even if it is not suitable for that use or in poor state. In line with the London Plan, we are of the opinion that consolidation of both SILs and LSIAs strengthens the designation as a whole. De-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land.

Recommendation 4 of AECOM's ELPS report strongly encourages the protection of the existing designated employment land; however the document has also recommended the release and re-designation of several sites within the SIL and LSIA including our client's site, the Former Bingo Hall site in Bendon Valley. Our client is very pleased to see this part of their site has come forward for re-

designation as part of this industrial land review. However, we would also advise that the Council also re-designate the Riverside Business Centre to the west of the bingo hall, which are also in need of renewal. By allowing the former bingo hall and Riverside Business Centre to come forward together, the Council will enable Workspace to develop a comprehensive scheme across the application site which will increase the employment density of the site and fulfil the Council's Strategic objective of providing flexible business space to attract SMEs.

The Council must continue to acknowledge the need for the Council to work collaboratively with developers and land-owners to produce comprehensive regeneration of both SILs and LSIAs where necessary. Policy 4.10 Part A(c) (New and Emerging Economic Sectors) of the FALP states that Council must work with developers and businesses to ensure availability of a range of workspaces, including start-up space, co-working space and 'grow-on' space'.

Question 7

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

Yes. Our client considers that the former Bingo Hall should be prioritised for removal from the Bendon Valley LSIA designation. Recommendation 6 of the ELPS states:

'R6 To help meet wider strategic objectives the Council could consider a change of use away from industrial employment uses at the following SIL/LSIAs industrial/warehousing clusters, through release from these designations by redesignating for a mix of uses including employment:

- *Central Wandsworth LSIA (C3) – Hunts Trucks and adjoining Gasholder only (2.8 ha)*
- *Bendon Valley LSIA (C6) - (0 ha as not currently in employment use)*

The study has made a clear recommendation for the removal of the former bingo hall and should be prioritised for re-designation. The current uses on site are not pertinent to the established role of a LSIA (as defined in Policy DMI1 of the DMPD) as the site is dominated by the Mecca Bingo building and its vast associated car park. The former bingo hall is currently occupied by a trampolining centre (Use Class D2); a use which does not reflect the industrial or business uses protected under the LSIA designation. Moreover, the ELPS suggest that removing the site from the LSIA designation boundary would be such that it would not likely jeopardise the integrity of the remaining LSIA owing to its position at the boundary of the area. As a result, the site currently undermines the LSIA designation and the Council should prioritise this site for re-designation.

Question 8

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

Yes. Our client considers that the Riverside Business Centre to the west of the bingo hall should also be acknowledged as a site with potential for new development and intensification.

If one includes the former bingo hall, the relevant industrial designations (B1c and B8 uses) only account for around 20% of the site meaning that the existing employment density is inefficient and far below its desired level. Paragraph 8.28 of the policy options document recognises that the business centre's industrial buildings are relatively old and outmoded; Workspace is concerned that the existing tenants of these spaces could choose to move on if the accommodation is not brought up to modern standards.

The properties also have issues regarding permeability between neighbouring uses and the majority of buildings on site fail to provide any active frontages at street level. When combined with the lack of supporting uses such as cafés, retail units, etc. this makes for a poor quality pedestrian environment.

As a consequence, Workspace Group PLC believe that there is significant scope to regenerate the entire estate and deliver substantial benefits to the site including a far greater level of employment floorspace, improvements in accessibility to the site and a more sensitive integration into the context of surrounding developments. They consider it to be a transitional site which must ensure that the neighbouring residential, industrial and parkland are all respected which can only be achieved through redevelopment on a large scale rather than piecemeal developments. Workspace is keen to take on a leading role alongside the Council in developing a scheme which would achieve these goals.

Question 9

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

Our client recommends that the Riverside Business Centre (immediately west of the former bingo hall) should also be recommended for re-designation from its LSIA status. Our client's vision for the site is to regenerate the estate and deliver substantial benefits to the site including a far greater level of employment floorspace, improvements in accessibility to the site and a more sensitive integration into the context of surrounding developments.

The former bingo hall and Riverside Business Centre are considered to be a transitional site which must ensure that the neighbouring residential, industrial and parkland are all respected. By these sites coming forward together the Council will enable Workspace to develop a comprehensive scheme across the application site which will increase the employment density of the overall site and fulfil the Council's Strategic objective of providing flexible business space to attract SMEs.

Question 10

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

Based on the recommendations of the AECOM report and the findings of the London Industrial Land Supply & Economy Study 2015, the Council should not continue to protect other LSIA's for industrial type uses in their current form.

It is not logical to safeguard land which is unsuitable for that use or is in a state of disrepair. In line with the London Plan, we are of the opinion that consolidation of the both SIL and LSIA strengthens the designation as a whole. De-designating unsuitable land is vital to ensuring that there are no contradictions between policies and the existing condition of the land. To this end, Recommendation 4 of AECOM's ELPS report strongly encourages the protection of the existing designated employment land, however the document has also recommended the release and re-designation of several sites within the SIL and LSIA including Havelock Terrace and our client's site –the former Bingo Hall site in Bendon Valley. We would also advise that the Council also re-designate the Riverside Business Centre to the west of the bingo hall, which are also in need of renewal. By allowing the former bingo hall and Riverside Business Centre to come forward together, the Council will enable Workspace to develop a comprehensive scheme across the application site which will increase the employment density of the site and fulfil the Council's Strategic objective of providing flexible business space to attract SMEs.

The Council must continue to acknowledge the need for the Council to work collaboratively with developers and land-owners to produce comprehensive regeneration of both SILs and LSIA's where