

Wandsworth Local Plan Employment and Industry Document

SD/006 Appendix 1 - Full copies of all original Reg 18 version
consultation responses made between 11 December 2015 – 29 January
2016 and Council consultation Letters and Memos




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Mr Rob McNicol
Planning Policy
Housing and Community Services
Town Hall
Wandsworth high Street
London SW18 2PU

18 March 2016

Ref: 637

Dear Mr McNicol,

LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW
38 HAVELOCK TERRACE, LONDON SW8 4AL

We note that the Council is reviewing the policies in the Local Plan that relate to employment land, including areas, sites and buildings that are used as offices, factories, warehouses and workshops, as well as related activities like waste processing.

The consultation document produced by the Council acknowledges that in recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development, due to the high demand for housing and the difference in land values between these uses. As well as providing the housing that the Borough needs, the Council also needs to ensure that the future requirements for industrial sites and employment uses are met.

Thus, your current review seeks to ensure that the Council's approach is up-to-date and based on the latest evidence.

Our interest lies with No.38 Havelock Terrace. The site comprises a single storey workshop/garage building and associated area of open yard, set behind a tall, circa 3m high brick boundary wall (images attached).

The site is currently in Use Class B1(c). The site is located on the corner where Havelock Terrace meets Pagden Street. The site backs onto the Gladstone Court Business Centre and railway viaduct. The site falls within, but on the edge of, a Strategic Industrial Location (SIL).

The immediate surrounding area is characterised by other commercial uses. On the opposite side of Havelock Terrace is a 2 storey warehouse/car workshop building, and abutting the site to the south east is another similar single storey structure. Across from Pagden Street to the north lies a 2 storey workshop building, and adjacent to this is the 3 storey Avro House. The general area comprises a mix of storage, distribution and workshop uses, with ancillary office space. To the immediate south is the

recently converted Henley office building (use class B1a), for which consent has been granted for an additional floor. This site also sits within the SIL/PIL.

As referred to above, the site and its immediate context are allocated in the London Plan (2015) and the Council's Core Strategy as part of the Strategic Industrial Location (SIL) and is defined more precisely within the London Plan as a Preferred Industrial Location (PIL).

The Mayor's Plan states that areas designated within the SIL "*are London's main reservoir of industrial land*", and paragraph 2.79 of the Plan states that, Preferred Industrial Locations are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities.

Policy 2.17 of the London Plan states that where appropriate the SIL should be protected. Development proposals in SILs should be refused unless they fall within the broad industrial type of activities outlined above (and in paragraph 2.79 of the LP).

Supported by the LP, Wandsworth DMPD, Policy DMI1 (SILs) currently states that within SILs the loss of existing B1(c), B2, and B8 floorspace will be resisted and proposals for B1(a) and B1(b) uses in SILs will only be permitted where it is ancillary to the principal use on site.

Since the DMPD was introduced, the planning policy landscape has fundamentally changed. We believe that the current DMPD policy is out of date, particularly in respect of the policy's reference to B1(a) accommodation and the interaction with SILs/PILs. We believe the appropriate uses within SILs/PILs should be widened to include B1(a) and B1(b) uses. We set out our reasoning below:

The Council's Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (*LSIA*), the Wandsworth Employment and Industry Review asks at 3.2.1,

- ***Should we continue to protect these areas for industrial uses?***
- ***Should we allow mixed use development or other uses in any of these areas?***
- ***What other uses do you think are appropriate in these areas?***

The old Wandsworth UDP policies used to refer to all B1 use classes, including B1(a) offices, as being acceptable in these industrial areas. As a result, at that time it is advised by Wandsworth officers that the Borough lost large amounts of its industrial employment land to the redevelopment taking place in the Vauxhall Nine Elms and Battersea Opportunity Areas (VNEB OA).

The Council has since sought to better protect its industrial stock and to strengthen related policies. The resulting DMPD (policy DMI1), which superseded the UDP, removed all references to B1(a) and B1(b) uses and only reference to B1(c) uses as being acceptable was retained. The UDP was superseded by the Core Strategy in October 2010, and the DMPD in February 2012.

Since 2012, significant policy changes have come into effect which threaten employment land, particularly office accommodation.

Most notably, Schedule 2, Part 3, Class O of the General Permitted Development Order, allowed for a temporary period, permitted development rights in respect of a change of use of premises from B1(a) office use to C3 residential. This was subject to Prior Approval being sought in respect of flooding, contamination, highways, and transport issues. The only exception to this provision in Wandsworth was the allocated Nine Elms area. All other parts of the Borough have been affected.

In a statement issued just earlier this week, regulations laid before Parliament last week confirmed that the above rights which were introduced on a temporary basis will now be made permanent. The regulations remove the exemption of certain areas (including Nine Elms) from the permitted development right, with effect from 31 May 2019. Accordingly, unless an Article 4 Direction is brought in and accepted, potentially the entire borough of Wandsworth will be subject to this permitted development provision. It is understood that a new three year temporary permitted development

right for the change of use from light industrial (such as 38 Havelock Terrace) to housing will also be created, up to a maximum floorspace of 500m².

The significant impact of the 'office to resi' permitted development right is well documented.

According to the Wandsworth Council's 'Non-Residential Development Report Position Statement' (at 31st March 2014), it confirms that in the year 2013/14, there were losses of approximately 22,235m² of B1a floorspace by way of prior approval/certificate of lawful use, with further potential loss of 3,998m².

'Office to Residential Conversion – establishing the impacts of the prior approval regime' (September 2015), a report produced by CBRE (based on DCLG data and in conjunction with the British Council for Offices), confirms that in the period between April and December 2014, Wandsworth Council received 65 notifications for change of use. 31% were passed without prior approval being required (the highest of any London Borough in that period). 57% were granted. Only 12% were refused.

The same report suggests potential losses of up to 355,215m² of office floorspace within the borough if all PD schemes approved in that time were implemented.

The Impact of Permitted Development Rights for Office to Residential Conversions, a London Councils briefing (August 2015), confirms that Greater London has been particularly affected by the introduction of permitted development rights. The impact of the permitted development rights on London's economy has been multifaceted. Some of the key consequences include:

- Loss of key office accommodation: figures submitted by London boroughs indicate that approval has been granted for at least 100,000 sq m of wholly occupied office floorspace between May 2013 and April 2015, and 834,000 sq m total office floorspace.
- Loss of occupied space: the existing permitted development rights make no distinction between occupied and vacant office accommodation, and allow for no consideration of the impact of the loss of key office space.
- Increase in office rents: some boroughs have reported that permitted development rights have had an impact on land values for scarce office stock, threatening the viability of office redevelopment and refurbishment even in areas where there is clear demand.
- Reducing viability of local office markets: a critical mass of office accommodation is being lost, reducing the viability of economic centres.

The following information is based on data supplied to the Greater London Authority by the London boroughs up to May 2015. It is not a comprehensive record of conversions undertaken by permitted development rights, but gives a clear picture of the amount of office accommodation in London which has been approved for conversion under the rules.

- At least 2,639 office to residential prior approval applications have been received by London boroughs between May 2013 and April 2015.
- Approval has been granted for at least 16,600 new dwellings through office-to residential permitted development rights since May 2013.
- Prior approval has been granted for at least 322 fully occupied office spaces across London – around 39 per cent of those approvals granted for which occupancy information is available.
- Office floor space information is available for 1,232 prior approvals. The floor space lost through these schemes totals 834,000 sq m, or around 675 sq m per scheme

Office markets across the UK, but particularly in London, are under pressure arising from demand growth (employment growth) – this is driving take-up upwards, which is in turn reducing availability.

Development activity to keep up with this demand is increasing, but the balance remains in favour of landlords, with availability falling for most types of space. Office vacancy rates are therefore low, and falling. As a result, office rents have now reached record levels in central London and the ripple effect is being felt far beyond the Central core. The imbalance of supply and demand in the office stock will be exacerbated by the long-term increase in office-to-residential conversions.

In light of the above, we consider that SILs/PILs may present local authorities with the best opportunity to protect employment sites, by becoming exemption sites (by way of Article 4), and including offices if made an acceptable use in such areas.

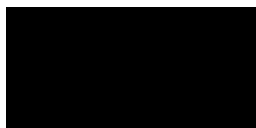
These locations are characteristic of employment uses and much less attractive to residential uses. The buildings are not usually easily adapted for conversion to residential use. Moreover, it would be anticipated that these PILs/SILs would be the most obvious parts of the Borough to seek a successful Article 4, thereby assisting the local authority in controlling their losses to alternative uses.

Moreover, whilst the extended rights will largely be subject to the same considerations for prior approval as the existing temporary rights, there is the addition of a noise assessment test for qualifying proposals. This is designed to allow local planning authorities to consider mitigation to counter noise from surrounding commercial uses. This may further assist in the control of sites in PILS and SILs which will predominantly be B2 and B8 uses, not usually compatible with residential uses due to the nature of their activities.

For the above reasons, we consider that the Council should continue to protect these areas for industrial uses, however, we would encourage officers to return to the provisions of the former Wandsworth UDP to would allow a greater mix of employment uses, including B1(a) and B1(b) uses.

We trust the above is of assistance. Should you have any questions or require any further information in the meantime, please do not hesitate to contact us.

Yours Sincerely,

A solid black rectangular box used to redact the signature of Mandip Sahota.

Mandip Sahota

Site Photographs



01 - View East on Battersea Park



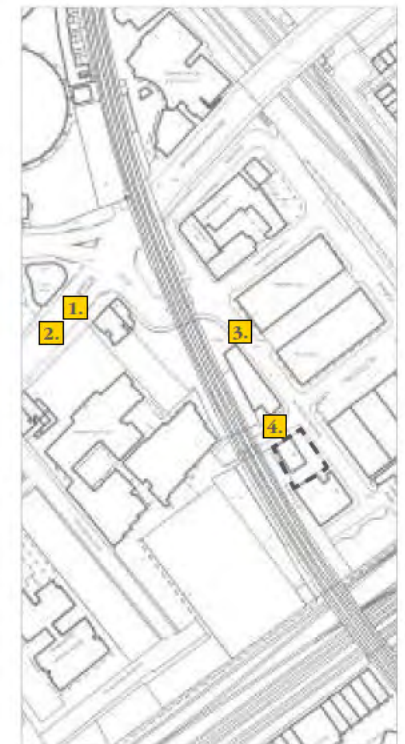
02 - View West on Battersea Park



03 - View South on Havelock Terrace



04 - View West towards Newton Prep School



Site Photographs



01 - View of 38 Havelock Terrace



02 - View West towards Newton Prep School



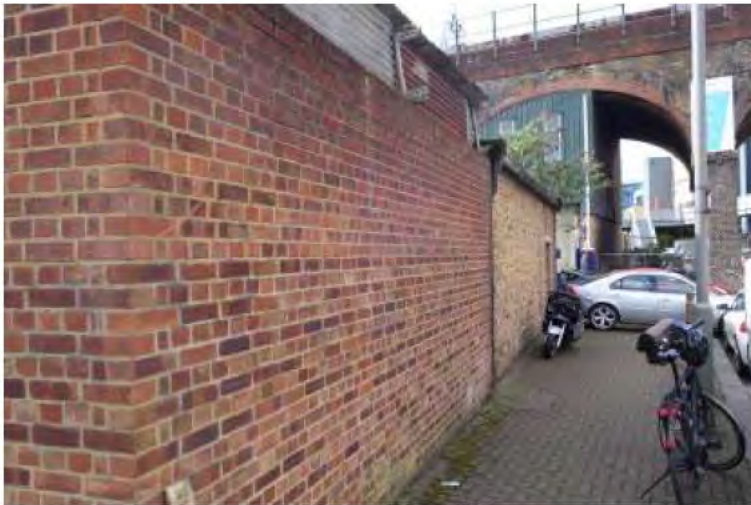
03 - Newton Prep School - Sports ground



03 - Newton Prep School sports ground



Site Photographs



01 - View of 38 Havelock Terrace, North boundary



02 - View of MOT Services opposite the site



03 - West facing rear wall of the subject site



03 - View North from within the Network Rail access road (Site to right)



Site Photographs



01 - Battersea Exchange - Block 06



02 - Battersea Exchange Block 06



03 - Battersea Exchange - Block 07



Employment and Industry Review

My comments apply to the overall approach and hence are in one email rather than section by section.

The review should be carried out as part of a holistic approach, considering how existing protected employment land functions in a much wider context. In particular, thought should be given to movement through such areas, their environmental quality and how they are connected to their surroundings.

The review should not be seen as a *release* of employment land, rather a means of providing upgraded floorspace for a variety of employment generating uses with greater job densities.

Any residential use at appropriate density should be seen as a means of delivering new forms of employment and other wider environmental benefits.

Assessments should also be carried out of built form, both visually and in terms of potential life span, noting that many SMEs function in clusters of cheap accommodation. Retention, refurbishment and extension should therefore be a starting point in a study. Strategies should be put in place to avoid displacement of valued local businesses.

Employment uses should be viewed in very broad way, including other non-residential uses such as education, health care and sports facilities that can contribute to social infrastructure and placemaking.

If the review leads to a change in the designation of protected employment land, discussions leading to the submission of planning applications should be accompanied by masterplans explaining improvements to permeability and connections to a wider area. Ideally, non-residential use should not be speculative, with floorspace designed to suit identified occupiers, yet in a way that is adaptable. Fit out costs should be factored into viability reports and applications should be accompanied by delivery strategies.

The Employment and Industry Review should test the resilience of the Summerstown SIL and reimagine its form and extent, taking account of the likely development of a new stadium for AFC Wimbledon and the short term use of Weir Road for construction during Crossrail 2. A study should look at pedestrian and cycle movement through the area, an environmental upgrade and access to and across the R Wandle.



Comment

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Consultee	(969001)
Company / Organisation	Callington estates Ltd
Address	C/O Simply Planning Ltd 25 Manchester Square London W1Y 3PU
Event Name	Wandsworth Local Plan: employment and industry review (Dec 2015)
Comment by	Callington estates Ltd ()
Comment ID	LPEI12
Response Date	29/01/16 18:44
Consultation Point	3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA) (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comment

Any review of employment land and premises within the Borough and therein the protection to be afforded to such sites should logically review the role, function and detailed boundaries of the defined SILs and LSIA's to ensure those boundaries remain up-to-date and relevant. Land and premises should only be allocated within such designations where they form part of a unified, homogenous area having particular regard to adjacent land uses, access and servicing. Where sites are at the edge or fringe of currently designated employment areas and do not relate well to them, for example, when regard is had to adjacent land uses, the potential for those sites to be removed from the designated area should be considered. The contribution such sites could make to delivering other uses, and notably housing, should be assessed. In summary the Council should take the opportunity of this employment land review to give careful consideration to the precise boundaries of the defined SILs and LSIA's and use the opportunity to revise those boundaries where appropriate. A review of all SIL and LSIA boundaries and the appropriateness of retaining land and sites within them should be the preferred approach to the release of SIL and LSIA sites rather than seeking to identify individual SILs or LSIA's to be released. This suggested approach would mean that only sites that truly warrant such designation

will be allocated and, in addition, may lead to a more dispersed release of former employment land to other uses across the whole Borough, which is to be preferred.

31 May 2016



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Dear Rob

POINT PLEASANT WORKS, PUTNEY BRIDGE ROAD, SW18 1TU REPRESENTATIONS FOR THE EMPLOYMENT AND INDUSTRY REVIEW

Further recent discussions with my colleague, Tom Faulkner, in connection with the above site, I write on behalf of my client, Charterhouse Property Group (Charterhouse) to provide representations to the Employment and Industry Review in relation to the release of the site.

1. Site and Surrounding Area

The site measures approximately 0.08 hectares and is broadly rectangular in shape. It is currently occupied by a single storey building with associated hardstanding which is used as an equipment and tool hire business (Sui Generis).

The site is bound by a railway line to the north, by a four storey office building to the south, the junction of Putney Bridge Road and Point Pleasant to the west and an electrical sub station to the east. On the western side of Putney Bridge Road, opposite the site, is a three storey public house and beyond lies period residential housing ranging between two and three storeys in height. To the north, beyond the railway line, the area comprises large new build residential developments, ranging from 4 storeys to 21 storeys in height.

The site is located approximately 300m north of Wandsworth High Street, which has a wide and thriving selection of local amenities, including commercial floorspace, shops, community uses, and cafes / restaurants and bars, and Wandsworth Town Centre is defined as a Major Centre in the London Plan. In addition, Wandsworth Park is 120m from the site, which also provides access to the Thames Path.

The site is not located in a conservation area, but is located adjacent to Wandsworth Town Conservation Area. In addition, the site is not located within an Archaeological Priority Area.

The site has a PTAL rating of 4, indicating a moderate to good level of access to public transport. The site is in close proximity to Wandsworth Town National Rail Station (750 metres), East Putney London Underground Station (850 metres), and the bus stops along Putney bridge Road (which provide services to Central London and Vauxhall in the east, Hammersmith and Putney in the west and Earlsfield and Tooting in the south).



2. Planning History

In terms of planning history, the site was the subject of a planning application, approved in July 2000, for: *Use for the hire of tools and construction equipment* (LPA Ref: 2000/1298 C). There are no other relevant planning applications recorded on the Council's website.

3. Planning Policy Framework

The emerging redevelopment proposals have taken account of the national, regional, and local planning policy framework. The statutory development plan comprises:

- London Plan (2015);
- Core Strategy (2016); and
- Development Management Policies Document (DMPD) (2016).
- Site Specific Allocations Document (2016).

4. Locally Significant Industrial Area (LSIA) Designation

The site is currently identified as within the Central Wandsworth Locally Significant Industrial Area (LSIA) and therefore covered by Policy DMI 1 of Wandsworth's Development Management Policies Document. This states:

"Within the SILs and LSIA's, 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."

From recent discussions with you, we understand that the council is currently undertaking an Employment and Industry Review to determine whether any of the existing LSIA allocations could be amended to alternative uses. It is considered the Point Pleasant Works site should be removed from the Central Wandsworth LSIA for the following reasons:

Isolated Position

The site is located in the north western corner of the LSIA, on the periphery of the designated area. It is separated from the main industrial area by Sudlow Road, a residential street comprising period terraced housing. It is not considered to be part of the core industrial area, rather a transition site, between areas of general industrial uses and residential uses. The site is therefore considered to be isolated from the majority of the LSIA.

Existing Use

The site is currently occupied by an equipment and tool hire business (Sui Generis) and therefore it does not function in line with the majority of the other uses within the LSIA (Use Classes B1c, B2 and B8). There is also a larger tool hire business located on Ferrier Street to the east of the site. The site immediately south of the Point Pleasant Works site, also located within the LSIA, comprises an office building (Use Class B1a), which again does not function in line with the majority of the other uses within the LSIA.



Mixed Use Surroundings

Residential uses (Use Class C3) are located in close proximity, comprising a gated development at the junction of Oakhill Road and Putney Bridge Road and period residential terraced housing along Oakhill Road. The site sits adjacent to an office block (Use Class B1a) and opposite a public house (Use Class A4) located on the western side of Putney Bridge Road. The site's setting is characterised by mixed 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.

5. The Proposed Development

In light of the above, Charterhouse considers that a mixed use development on the site, comprising ground floor commercial uses and residential accommodation above would be more appropriate given the location and function of the site. In addition, Charterhouse considers that an office building (Use Class B1a) on the site would also be appropriate. Charterhouse has prepared two schemes on these bases which have been submitted to the council for pre-application advice with a view to bring forward a detailed planning application later this year for the redevelopment of the site.

Please feel free to contact me or my colleague, Diana Thomson (0203 320 8250 or dthomson@savills.com), of these offices in the first instance if you have any queries or would like to discuss.

Yours sincerely

Kieran Wheeler
Director

Enc. As above

Cc. C.Old, Charterhouse

Clapham Junction Action Group51 Mossbury Road,
London SW11 2PA

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

7th January 2016**Consultation on new Local Plan document covering employment premises and industrial land**

Dear Sir,

The Council is producing a new Local Plan document covering employment premises and industrial land. You are inviting us to make representations on the Council's proposed areas of review.

We have spent a tremendous amount of (unpaid!) work on previous consultations.

We have produced hundreds of pages of analysis and comments. The main ones have been recently confirmed by the inspector in charge of reviewing the local plan (which final report was even not received when you submitted your email on 10 December regarding this consultation on a new local plan!).

However our comments are brushed aside and dismissed (when not mocked) by Wandsworth Council. The Council is only implementing some of our recommendation when forced by either the government or organisations such as TfL.

For many years in the past we have been saying that Wandsworth Planning policies were ineffective. The Council has always denied it and went up to calling us Nimbies because we dare highlight the facts. And yes, they are not our own fantasy, but those allegations were actually confirmed by the government inspector during the Local Plan examination: "*the documents as a whole are ineffective*" he wrote at the end of July. We were right. **Is the Council going to apologise?**

In the same way, we complained many times that so-called consultations were only box-ticking exercises for the Council. In December 2014 we wrote to the Council:

*"As usual, we noticed (and regret) that most of the comments made by the residents, groups and societies have been rejected or ignored in your responses to the 2013 consultation on planning policy; **it questions, once more, the purpose of the full process, other than ticking the right box at the right time.***

*We have little hope that any more consideration will be given regarding concerns of the local residents. And we believe that the same feeling is shared by all the other Societies in Wandsworth. In itself, not addressing that issue is showing the **poor consideration given by Wandsworth council to the consultation process, which is only therefore fulfilling its statutory duties.***"

Recent debates within the Council chamber have once again proven us correct. When the Council decided to run its own poll on its website and was eventually displeased by the result, they decided it was irrelevant regarding the entire population of the borough. Cllr Govindia, leader of Wandsworth Council, made this cynical remark:

"62% of the 1,366 respondents to the Council's survey expressed this view – not 62% of residents. That equates to 847 people. As a percentage of the Borough's population of around 310,000, that is 0.27%".

Following Mr Govindia reasoning, only 21 representations were received regarding the examination of the Council's planning documents. This is 0.0068% of the borough's population. Let's be honest. We will never reach 160,000 representations of residents (*including new born babies objections according to Mr Govindia's calculation!*). What's the point of consultation?

Once again it is a very clear example of the level of consideration that Wandsworth Council is giving to consultation and democracy.

You are proposing now some areas for review. In respect of the process of consultation, we will address your point:

1. Overall Approach: **Wrong**
2. Strategic Issues: **What are you protecting really?**
3. Offices: **Are you really focusing on town centres? Putney would be delighted to hear!**
4. Specific Policies: **When have you seriously tried to protect offices? Where is you Action 4 Direction?**

During previous consultations, you have already received our comments on employment zones. You have dismissed our criticisms on your attitude to protect

offices in view of recent legislation changes. Conversions from industrial sites to retail, then to residential have been the norm and you have done nothing to restrict it.

Therefore why should we spend time on this new consultation? Especially on industrial land, when the Council failed to protect and even encouraged its disappearance? **Is Wandsworth Council going to listen in 2016?**

Yours faithfully,

Cyril Richert

Clapham Junction Action Group

<http://cjag.org>

Wandsworth Local Plan: employment and industry review (Dec 2015)

Mrs Helen Evans
Covent House
New Covent Garden Market
London
SW8 5NX

helen.evans@cgma.co.uk

Consultee ID	Name	Organisation	Title	Number	Comment
968717	Mrs Helen Evans		Overall Approach	3.1	Yes
968717	Mrs Helen Evans		Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	There needs to be a balance between the use of land to provide housing and the loss of industrial land that provides jobs. The increase of permitted development right applications to convert office space into residential can reduce local jobs and increase commercial rents to the detriment of small businesses.
968717	Mrs Helen Evans		Mixed Use Former industrial Employment Areas	3.2.2	Mixed development helps create and sustain communities and reduces the need to commute out of an area to work, so reducing transport congestion.
968717	Mrs Helen		Offices	3.2.3	Yes

Consultee ID	Name	Organisation	Title	Number	Comment
	Evans				
968717	Mrs Helen Evans		Specific Policies	3.4	Business rates for start ups / incubators could be reviewed

creating a better place



Planning Policy
Housing and Community Services
Wandsworth Council
London
SW18 2PU

Our ref: SL/2006/100015/CS-08/IS1

Your ref: Email

Date: 29 January 2016

planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

Wandsworth Local Plan: employment and industry review – preparation stage

Thank you for consulting the Environment Agency on the above. We agree with the approach to produce a single Employment and Industry Local Plan document. The consultation document recognises that in recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development, due to the high demand for housing and the difference in land values between these uses. The ongoing regeneration schemes in the borough will increase demand for industrial and logistics space.

There is need to continue to protect Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA). DTZ in the 2010 Employment Land and Premises Study concluded that all SILs and LSIA are either of sufficient quality or in enough demand to be protected for industrial employment uses. However, the Environment Agency does not comment on comparative assessment of land, its availability or suitability for a particular form of development, or the sustainability justifications of development and other material planning considerations as these are beyond the scope of the Environment Agency role, save where a particular land use is prohibited within Flood zone 2 or 3, or is the subject of the application of the Exception Test.

We agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach although we have no idea how other strategies will impact on the plan. The borough has recently reviewed the local plans including the core strategy and Development Management Policies Document (DMPD). We have had Lombard Road/York Road riverside focal point and Roehampton Supplementary Planning Documents (SPDs) consultations recently. There is need to align employment and industry review with the recently adopted documents and other emerging plans.

The Vauxhall Nine Elms Battersea is a designated "opportunity area" in the London Plan. It includes 182 hectares of land on the South Bank between Battersea Park and Lambeth Bridge. Already a planning framework for the area has been prepared and approved. A series of major regeneration schemes are planned for the area including the new US Embassy complex and the redevelopments of Battersea Power Station and New Covent Garden Market. The preparation of the planning framework involved major landowners and developers in the area, the London boroughs of Wandsworth and Lambeth, the Greater London Authority and Transport for London. Therefore there is need for close working relations with all parties involved and cross-boundary working should form part of work under the Duty to Co-operate.

Environment Agency, Ergon House, Horseferry Road, London, SW1P 2AL

03708 506 506

kslplanning@environment-agency.gov.uk

www.gov.uk/environment-agency



When reviewing the site allocations for employment and industry land, the council should consider how other objectives could be achieved too. For example sites would help deliver improvements to watercourses and biodiversity and therefore contribute to delivering a better environment. Opportunities to look for an integrated approach to future development should be criteria for site allocations or changes. So improving biodiversity along with flood risk and urban run off may provide multiple benefits for the local community.

We would wish to see the document take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan. It should also reflect the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.

It's essential the review of site allocations help to deliver resilience to a changing climate. New and existing infrastructure across the borough such as bridges, roads, railways and electricity sub stations should be carefully designed, located and maintained to remain safe and operational during a major flood event or drought.

Our detailed comments are attached below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

Charles Muriithi MRTPI
Planning Specialist

Direct dial 0203 263 8077

Direct e-mail charles.muriithi@environment-agency.gov.uk

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Thames Estuary 2100 (TE2100) Plan

We would wish to see the employment and industry land review incorporating Thames Estuary 2100 (TE2100) Plan requirements to address our main environmental concerns. This should include managing tidal flood risk in accordance with the measures set out in the TE2100 plan taking into account the ability to implement future improvements to flood defences.

The employment and industry land review should reflect the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements. Development and regeneration in Wandsworth should be located and designed to be resilient to flood risk, climate change and reduce reliance on traditional flood defences. Location and design should be informed by the latest evidence on flood risk and climate change.

Wandsworth to Deptford policy unit

The flood risk management policy set out in the TE2100 Plan for Wandsworth is as follows: The *Wandsworth to Deptford* policy unit: Policy P5, to *take further action to reduce flood risk beyond that required to keep pace with climate change*. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls.

The Wandsworth to Deptford policy unit extends from Wandsworth to Nine Elms and includes residential areas (mainly high rise flats) with riverside paths, commercial and industrial premises with no public riverside access, and Battersea Park. The tidal defences extend along the lower reach of the River Wandle in Wandsworth.

The ground level in much of the policy unit is low (at between 0 and 2m AOD) whereas the level on the Thames frontage is generally higher (typically 4m AOD). Thus there would be great difficulty evacuating floodwater should flooding occur. In some areas the defence line is integrated into buildings with a riverside walkway that is liable to occasional flooding. Actions involving cross-boundary working between local councils should therefore consider the following:

- A consistent approach to improving the flood defences at the boundary between the London Borough of Wandsworth and the London Borough of Richmond. This should include collaboration on flood management and other improvements to the Beverley Brook.
- A consistent approach to improving the flood defences and the riverside at the boundary between the London Borough of Wandsworth and the London Borough of Lambeth at Nine Elms.

Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 10 metres. More space may be required especially if wider requirements are to be achieved.

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There is scope in Wandsworth for local flood defence realignments to achieve landscape, public amenity and environmental enhancements, for example at new development sites. Where realignments of the existing defences are envisaged, land will be required including an allowance for future defence rising.

Strategic Flood Risk Assessment

The borough has 8 kilometres of Thames riverside stretching from Putney in the west downstream to Nine Elms in the east. This area has experienced considerable redevelopment. The Strategic Flood Risk Assessment (SFRA) reveals that a significant number of potential development sites on the Thames riverside fall within Flood Zones 2 and 3a.

We seek the following outcomes relating to flood risk management:

- Policies and site allocations ensure no inappropriate development is located in areas at high risk of flooding
- Ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere
- Local Plans contribute to reducing flood risk for existing communities
- Council identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risks
- Partnership working to secure financial contributions to flood defence schemes from planning charges where appropriate
- Managing tidal flood risk in accordance with the measures set out in the TE2100 plan. Developments should take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan.

Surface Water Management

The Surface Water Management Plan has identified thirteen Critical Drainage Areas (CDAs) within or crossing the administrative boundary of the London Borough of Wandsworth. The borough is the 'lead' in terms of managing flood risk within eleven of these CDAs, and within the remaining two as the 'supporting' borough. It will be necessary to work in partnership with other boroughs to manage flood risk within several of the CDAs. The greatest number of receptors is at risk from surface water flooding along the route of the 'lost' Falcon Brook, which runs north to south through the east of the borough - Clapham Junction CDA. Significant ponding of surface water (>0.5m) is modelled to impact Tooting Bec, Summerstown and South Balham.

There are recorded surface water flooding problems in the Falcon Road (Clapham Junction area), South Balham and Lavender Hill areas. The Clapham Junction and Tooting Bec CDAs are impacted from upstream surface water flows from the London Borough of Lambeth, and it will therefore be important that the flood risk is managed at a catchment scale by both Councils.

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There are a number of opportunities for measures to be implemented across the borough to tackle surface water flood risk. Ongoing maintenance of the drainage network and small scale improvements are already undertaken as part of the operations of the borough. In addition, opportunities to raise community awareness of the risks and responsibilities for residents should be sought, and London Borough of Wandsworth may wish to consider the implementation of a Communication Plan to assist with this.

Pluvial modelling undertaken as part of the SWMP has identified that flooding within the London Borough of Wandsworth is heavily influenced by existing and historic river valleys, and impacts a number of regionally important infrastructure assets. To address local flood risk in the London Borough of Wandsworth it is recommended that, in the short to medium-term, Wandsworth Borough Council:

- Undertake a Drainage Capacity Study in the Falcon Road / Clapham Junction area in conjunction with Thames Water to determine local drainage capacity, connections and identify flood mitigation options through detailed modelling;
- Confirm the resilience of infrastructure to surface water flooding through engaging with energy operators, TfL and Network Rail regarding the surface water flood risk to the Electricity Substation on Copper Mill Lane, red routes and York Road / Trinity Road Pumping Station, and key railway infrastructure (railway cuttings and stations) identified to flood throughout the Borough respectively, and confirming the drainage assumptions used within the SWMP pluvial modelling;
- Identify the scope for undertaking local drainage investigations in North Tooting Graveney Summerstown and agree a timetable for undertaking these (dependent on funding availability). Build on the findings of the Drainage Capacity Study proposed for Clapham Junction); and
- Investigate the feasibility for flood storage opportunities and flood mitigation measures in Garratt Park and Wimbledon Stadium Business Park area and Tooting Bec Common in conjunction with Environment Agency and Network Rail respectively.

Waste Management

The ongoing regeneration in the borough will see substantial new residential and mixed-use development, and this will give rise to significant quantities of waste, during construction and occupation. Waste reduction and recycling needs to be fully considered and implemented in the design phase, the construction phase as well as the operational phase. The Vauxhall Nine Elms Battersea (VNEB) Opportunity Area Planning Framework (OAPF) contains three safeguarded wharves:

- Cringle Dock – an operational waste site (Western Riverside Waste Authority). Specialist infrastructure enables waste transfer activities to take place in a covered dock.
- Kirtling Wharf – an operational aggregates wharf (Cemex) which has planning permission to increase throughput of the wharf.

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- Middle Wharf – currently non-operational but considered to be capable of being made viable for waterborne freight handling purposes and may be required for construction of the Thames Tunnel. Following completion of the tunnel it should be brought back into operational wharf use and be able to contribute to the shortfall in wharf capacity in West London.

In line with the London Plan, the safeguarded wharves will continue to be safeguarded for waterborne freight handling uses in the long term, subject to frequent review. Use of the wharves for transportation of construction and demolition materials will play a key role in reducing the number of road freight vehicle movements in the area during the construction period and such opportunities should be maximised.

Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste and resource management can also support economic growth and the creation of new jobs.

Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Improved waste management can also contribute to reducing greenhouse gas emissions, including through the use of waste materials to generate renewable energy.

Waste is a strategic matter under Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011) and is referred to as one of the strategic infrastructure priorities in the NPPF (paragraph 156). This means that waste will often be subject to the Duty to Cooperate. Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.

The outcomes we want to see:

- Businesses and other organisations reduce the impacts of their activities on air, land and water, using resources efficiently and minimising waste disposal and manage their waste responsibly.
- The right waste and resource management infrastructure is in place.

The Environment Agency has three main roles in waste and industry regulation:

- We are the main organisation responsible for the regulation and permitting of complex industrial processes and waste management activity in England, through the application of statutory regimes (such as the Environmental Permitting Regulations).
- We are responsible for tackling serious illegal waste activity.
- We are an advisor to Government and local councils on waste and waste infrastructure planning. We provide data and information on waste, waste management and environmental pressures and limits to help them with their work and decisions.

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Groundwater and Contaminated Land

Redevelopment of some sites may present constraints due to land contamination arising from previous use. National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

The contaminated land regime in Part 2A of the Environmental Protection Act 1990 tackles the historical legacy of land contamination but does not take into account possible future uses which would need a specific grant of planning permission. To ensure a site is suitable for its new use and to prevent unacceptable risk from pollution, the implications of contamination for new development would be considered by the council to the extent that it is not addressed by other regimes.

Information on the most common industrial activities and the risk of contamination is in Volume 2, Annex 3 of '*Guidance for the Safe Development of Housing on Land Affected by Contamination*', published by the Environment Agency, NHBC and CIEH. More information is also available from industry profiles published by the Environment Agency.

Contaminated Land Advice

If potentially contaminating activities have previously been conducted at this site, such as chemical or fuel storage, or other industrial processes, an assessment of risks to controlled waters from the land should be carried out and submitted to the Bromley council.

This work should follow the framework in the 'Model Procedures for the Management of Land Contamination' (CLR11), Defra / EA 2004. Risks to controlled waters should be evaluated in accordance with the 'Environment Agency guidance on requirements for land contamination reports'. These documents can be downloaded from our website at <http://www.environment-agency.gov.uk/subjects/landquality/113813/887579/1101611/?lang=e>

Climate Change

The flood risk climate change allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. This is due to be published in autumn 2015 and will replace previous climate change allowance. The main change to the allowances will be for peak river flow. Allowances will be provided for each river basin district, similar to those in 'Adapting to climate change: Guidance for flood risk management authorities'. We will update 'Adapting to climate change: Guidance for flood risk management authorities' so the allowances are consistent. Land use planning decisions should be based on the latest and most accurate climate change data and evidence.

<https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-allowances>

For other most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets

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from Natural England, Forestry Commission and English Heritage.
<http://www.geostore.com/environment-agency/>

Charles Muriithi MRTPI
Planning Specialist

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BY EMAIL

Dear Sirs,

REPRESENTATIONS: WANDSWORTH LOCAL PLAN EMPLOYMENT AND INDUSTRY REVIEW

I write on behalf of Generator Developments LLP to provide representations on the 'Employment and Industry Review' which is currently being conducted by the London Borough of Wandsworth. For the purposes of clarity these representations follow the format of the consultation document, with a specific focus on the review of Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA).

3.1 Overall Approach

The intention of producing a single Employment and Industry Local Plan Document is supported in principle, subject to the Document being sufficiently cognisant of other core priorities for the borough, in particular housing need. Sufficient flex needs to be built into the Local Plan Document to enable a timely response to changing circumstances across the borough. Any policy change should not result in a 'one size fits all' approach.

3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)

Paragraph 22 of the National Planning Policy Framework states that planning policies should avoid the long term protection of a site being allocated for employment where there is no reasonable prospect of it being used for that purposes – where this is the case, planning applications for alternative uses should be treated on their merits having regards to market signals and the relative need for different uses to support sustainable local communities.

Accordingly a balance must to be struck between appropriate safeguarding for heavier industrial uses (usually located within the SILS), and the encouragement of modern, flexible floorspace which is compatible with neighbouring residential uses (usually located within the LSIA's). Such an approach can help meet other objectives of the Local Plan - in particular the provision of much needed housing and affordable housing - whilst also fulfilling the needs of local business communities.

Recognition of the role that SILs and LSIA's play towards employment generation should remain, however emerging policy should seek to build-in appropriate flexibility to ensure the provision of a mix of uses, as appropriate.

Bendon Valley Locally Significant Industrial Area

In the context of the Employment and Industry Review it is considered that the Bendon Valley Locally Significant Industrial Area (BVLSIA) should be prioritised for release for appropriate mixed use development.

The BVLSIA is occupied by a series of low rise, low density office and light industrial units which are located within close proximity to existing residential development. Whilst it is acknowledged that parts of the BVLSIA benefit from on-going occupation for business purposes it is considered that the nature of the LSIA and the interaction with surrounding land uses make it wholly appropriate for release to secure mixed use development without compromising the range and quality of employment land available in the borough.

Of particular note is the area to the north of Lydden Road which abuts a terrace of residential properties to the north. This site is currently occupied by a large flat roofed building divided into nine mixed use (office and light industrial) units fronting onto Lydden Road. Covered parking bays and a flat roof garage block are located along the northern boundary. The office and industrial units, whilst occupied, are land hungry in their layout and the buildings themselves no longer provide fit-for-purpose employment floorspace. Consequently the site has low employee density, meaning the area is underperforming in terms of direct employment generation. This is a lost opportunity in the context of the area's good transport links, with both Earlsfield mainline station and Southfields tube station within walking distance.

The release of this land from the LSIA designation would enable the provision of modern, flexible employment floorspace as part of a mixed use development, supporting the needs of the local business community whilst contributing to housing supply within this area of the borough. It would also represent the better utilisation of a sustainable, brownfield area as supported by the NPPF. For this reason we consider the BVLSIA, and more specifically the area to the north of Lydden Road, should be released for mixed use development.

I trust the enclosed is sufficient for your current purposes and I look forward to receiving confirmation of receipt. In the meantime please do not hesitate to call me if you wish to discuss any point in more detail.

Yours faithfully

Anna Snow
Director

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

John Stone

Head of Forward Planning and Transportation
Wandsworth Council
Planning and Development Division
Housing and Community Services Department
The Town Hall
Wandsworth High Street
London SW18 2PU

Our ref: LDF32/LDD08/CG01
Date: 28 January 2016

Dear John

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: Wandsworth Council Local Plan: employment and industry review
Preparation Stage**

Thank you for your correspondence of 10 December 2015 notifying the Mayor of London of Wandsworth's proposed review of its Local Plan employment and industry policies. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. In this instance the Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London, which I endorse, will be sent separately.

Strategic Industrial Location and Locally Significant Industrial Areas

The Mayor welcomes the active management of industrial land and premises to ensure there is sufficient stock to meet the future needs of different types of industrial and related uses in different parts of London, in line with London Plan policies 2.17 and 4.4 and the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Wandsworth should ensure that any land to be released is surplus to local and strategic industrial need and that its release will be managed in ways which maintain economic performance of the wider industrial area.

Wandsworth's Employment Land Study should inform the quantum of industrial land that is required and identify the most appropriate locations and site characteristics needed for a variety of industrial uses. London Plan policy 4.4B sets out some of the matters that should be identified to inform a revised local policy on employment / industrial demand and supply. The study should consider the strategic role that industrial sites in Wandsworth play, including in supporting the strategic functions of the Central Activity Zone.

If required, Wandsworth should investigate the potential to re-invigorate existing industrial areas before they are considered for loss to alternative uses. However, where the loss of land in industrial use can be justified, the Borough could look at potential mixed use schemes for residential and emerging employment sectors that require specific design features but may also be more compatible with residential use than traditional industrial uses. In line with London Plan policy 4.4,

where the loss of industrial land can be justified, priority should be given to the loss of sites near good public transport provision to support housing and more intensive employment uses.

The Borough should be satisfied that the remaining industrial land will meet the growing and changing demands of a variety of industrial and related uses to meet local and strategic need over the lifetime of the Plan and that the size of the areas support their servicing and act as a buffer to other more sensitive land uses.

Mixed Use Former Industrial Employment Areas

It is unclear whether the use of 'former' here refers to industrial land that has already been released as part of recent Local Plan review or if its use assumes that this review will result in the release of industrial land. Any loss of industrial land should be supported by evidence, and only released where it has been demonstrated that it is surplus to local and strategic needs. Where the loss of industrial land can be justified, the preferred alternative land use should be informed by the Borough's Employment Study. Where appropriate, alternative employment uses could be complemented with residential development. As stated above, in line with London Plan policy 4.4, where the loss of industrial land can be justified, priority should be given to the loss of sites near good public transport provision to support housing and more intensive employment uses.

Offices

As per industrial uses, the need and provision of office space should be informed by the Borough's Employment Study.

Waste

Wandsworth's waste policy should be in line with the London Plan and the National Planning Policy Guidance on waste. The Borough will need to satisfy itself that it has safeguarded sufficient land to meet its waste apportionment and that the sites or areas have the potential to be used as waste sites, for example by assessing whether neighbouring land uses would could preclude a waste use due to potential disturbance from noise, vehicular movements etc

As part of the potential review of the London Plan it is likely GLA officers will be carrying out the following studies which may help augment Wandsworth's employment evidence. The technical evidence and likely completion date are listed below:

- Industry land supply (February 2016)
- Employment projections (July 2016 - updated annually)
- Industrial Demand (February 2017)
- London Office Review (February 2017)

The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that the comments provided at the current stage will inform the development of Wandsworth's policies. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss.

Yours sincerely



Stewart Murray
Assistant Director – Planning

cc Richard Tracey, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL

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By email: planningpolicy@wandsworth.gov.uk

Dear Sir/Madam,

Wandsworth Local Plan: employment and industry partial review

Thank you for the opportunity to comment on the partial review of the Local Plan policies relating to employment and industry.

As the government's adviser on the historic environment we have considered this in light of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Accordingly, the comments in this response are put forward to ensure consistency with the NPPF and the National Planning Policy Guidance and related advice in the Good Practice Advice Notes.

As a general point the historic environment implications of any change in policy, including changes to site allocations, should be fully integrated into the process, including through Strategic Environmental Appraisal. In order to facilitate this, we recommend that an appropriate level of analysis is carried out to establish the significance of the borough's industrial heritage and employment legacy.

At our recent meeting we discussed how a characterisation study of Wandsworth's historic environment would be an invaluable evidence base from which to understand the significance of the borough's built and archaeological heritage as a whole. A borough-wide approach would be the most effective in providing a comprehensive overview; however, it is possible to conduct more localised characterisation exercises too, tailored to the areas under examination. The recent outline study of Old Oak Common former industrial area is one example¹. The assessment would then inform the parameters for the sites included in the Area Spatial Strategies referred to in the consultation document.

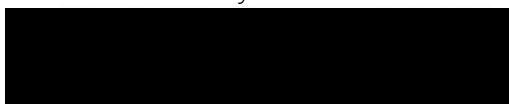
¹ This is an outline assessment and can be found on Historic England's website at: <http://research.historicengland.org.uk/Report.aspx?i=15319&ru=/Results.aspx?p=352>

In addition to broad characterisation there may be identifiable individual heritage assets that require further assessment at this stage. Historic England is currently conducting research into the significance of gas holders nationally, and we would be pleased to discuss with you the likely heritage interest of industrial heritage in the areas under consideration. As part of any assessment of heritage significance you should contact the Greater London Archaeological Advisory Service (GLAAS) to establish the above and below ground significance of undesignated heritage assets within the sites under review.

Finally, it is worth noting the potential for heritage assets within former industrial land to be the catalyst for heritage-led regeneration as identified in the London Plan, policy 7.9. Evaluating the sensitivities and opportunities of heritage assets to inform and guide master planning parameters can pay dividends in terms of creating distinctive, attractive environments. Examples of successful schemes in which heritage has been the key to unlocking positive change can be found on our website ².

We would be pleased to discuss these comments with you.

Yours faithfully



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Direct Dial: 020 7973 3771

² Examples of heritage-led regeneration are available at: <http://historicengland.org.uk/advice/heritage-at-risk/industrial-heritage/our-industrial-heritage/re-using-industrial-sites/>

Williams, Rhian

From: David & Miriam Howitt [REDACTED]
Sent: 15 December 2015 11:49
To: PlanningPolicy
Subject: Wandsworth Local Plan :employment and industry review

There is a great need for inexpensive small premises for start-up businesses. These can be within a dedicated building where a number can share facilities, or in opportunistic individual locations. For instance, as I cycle up Danebury Avenue on the Alton Estate West, I notice potential garage-sized premises beneath the two blocks of flats below the shops. Several bays already provide stores for the tenants, but it is only the landscaping between the blocks and the road that prevent more bays being opened up for this purpose. Re-designing the ramps would offer access to small workshops, offices, studios or shops (a shoemaker, IT consultant, dressmaker, accountant, domestic cleaning or child-minding agency, graphic designer, for instance) accessible to the general public.

Regards
Miriam Howitt (Architect)

27/01/2016

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Dear Sir/Madam

Re: Wandsworth Local Plan: Employment and Industry Review (preparation stage)

Boyer are instructed by Ipsus Development Ltd to respond to your recently published consultation on the Local Plan: Employment and Industry Review (preparation stage).

Our client has an interest in land and premises at 38-54 Lydden Road (SW18 4LR), which is currently within the Bendon Valley Locally Significant Industrial Area (LSIA).

This consultation response letter responds to the questions posed and also identifies the specific characteristics of our clients site and the wider LSIA which mean that it would be appropriate to consider de-designation or re-designation to 'mixed use' in the upcoming Employment and Industry Local Plan Review.

Therefore, in addition to the responses to the consultation questions this letter also includes information relating to our client's site and the wider Bendon Valley LSIA which we request is given detailed consideration as part of the Employment Land Review evidence base document, which we understand is due to commence in the spring.

3.1 Overall Approach

Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?

Yes it is agreed that producing a single Employment and Industry Local Plan document is the most appropriate approach in this instance.

The economy of London is changing rapidly and so are the space requirements of businesses. There is a



RTPI



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 who require flexible modern premises in good strategic locations.

The planning framework has also changed considerably since the last Wandsworth Employment Land Review 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.

The Wandsworth Employment Land Review was published in 2010 and the work to support this document will have been carried out prior to this, as such the 2010 Review will not fully reflect the changes described above and is therefore most likely out of date.

Given that a full review of the Local Plan is likely to take some time and that these policies were not included as part of the last review, it is agreed that this is the most appropriate approach in this instance.

3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)

Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?

The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so, which areas and why?

As mentioned above, the economy of London is changing and consequently so are the employment floorspace requirements of many business occupiers.

Despite overall job growth predicted in London, the latest GLA employment projections¹ for London show a large decline in the sectors traditionally associated with industrial floorspace. By 2036:

- manufacturing is predicted to decline by 50%;
- wholesale by 27%;
- transportation and storage by 9%; and
- primary and utilities by 13%.

Sectors which are expected to grow over the same period are those mostly requiring office type floorspace. For example:

- the professional, real estate, scientific and technical services sector is expected to grow by 35%;
- accommodation and food service activities by 34%;

¹ GLA Employment Projections <http://data.london.gov.uk/dataset/gla-employment-projections>

- information and communication by 34%; and
- administrative and support service activities by 28%.

This is likely to lead to a significant decrease in the need for industrial premises in London by 2036 and coupled with the increasing importance of service and technology based employment across London and the need for housing, it is important that the balance between retaining industrial sites and providing for alternative land uses is carefully considered.

Wandsworth is dominated by small and medium sized enterprises (less than 250 employees) at over 99% of all businesses in the borough² and with the vast majority of these being 'micro businesses' (less than 10 employees). The majority of these SMEs are in sectors typically requiring office floorspace rather than industrial with the most prevalent SME sectors being the professional, scientific and technical sector, information and communication sector, business administration and support services sector and the arts, entertainment, recreation and other services sector.

Whilst naturally these projections would need to be considered in more detail against other published projections and market signals, it is likely that the release of some industrial sites for other uses will be a conclusion of the Employment Land Review.

In light of the above, it would be logical to review the LSIA's in the first instance as they are smaller, are of less strategic importance to London and are often located within or adjacent to what are primarily residential areas. Therefore they should generally be considered for release prior to any release in the Strategic Industrial Locations (SILs).

The Bendon Valley LSIA is small (approximately 4.8 ha) relative to other similarly designated sites and is bounded by residential use to the north, east and south and by the River Wandle to the west. As shown in the photographs of the site in Appendix A, parts of the site are not currently being utilised to their full potential and some of the buildings are aging, in poor condition and deteriorating.

Further details relating to our client's site and the wider Bendon Valley LSIA can be found in Appendix A of this letter, however in summary:

- Number 38-54 Lydden Road is a single storey building with a flat roof built in the early 1960s. Although currently occupied some leases are nearing expiry and the premises, whilst in reasonable condition considering its age, are nearing the end of its useable life and will be requiring redevelopment in the medium to long term.
- It is located towards the north-western boundary of the LSIA and as such is immediately adjacent to residential properties. Therefore any redevelopment would be limited to that which is suitable in a residential area due to potential issues such as noise and traffic movements.
- Some of the current occupiers of 38-54 Lydden Road are owner occupiers who have operated from these premises for 10 years or more and have expressed intentions to retire within the next few years. Poorer condition premises will tend to depress the level of rents that can be achieved and this in turn impacts upon level of investment that can be made and the viability of the premises in the longer term.
- Despite being fully occupied, we have estimated that the site is currently operating at a density of around 85sqm per employee which is extremely low compared to the average densities set out in the Home and Communities Agency (HCA) Employment Densities Guide. The HCA Guide states that the

² NOMIS UK Business Counts (Enterprises) 2015

average density for new B1c floorspace is around 47 sqm per job, therefore even if the site were redeveloped with the same amount of modern B1c floorspace at around 47sqm per job it could achieve a considerable increase in the number of jobs provided on the site.

- The wider Bendon Valley LSIA already contains a mix of uses including employment, residential and leisure and is therefore not operating as its intended industrial allocation would suggest. The LSIA is in a poor strategic location for industry as it is located in a primarily residential area and the roads in the area are often heavily congested. The roads within and immediately adjacent to the LSIA are small and congested due to on-street parking issues, leading to issues with deliveries and the general maneuvering of large vehicles.
- Parts of the LSIA are vacant and in poor condition (such as the former Mecca Bingo Hall and car park) and are therefore not actively contributing towards the economy of the area and are having a negative visual impact on the surrounding residential properties. Other parts of the site, such as the Riverside and Earlsfield Business Centres, which offer flexible office/studio space, are performing better and achieving greater employment densities (although some vacant space is advertised). However, if these business centre sites are excluded, the remainder of the LSIA has a very low employment density.

Based on the above, it is clear that Bendon Valley is not performing as a high quality industrial location and is having a negative amenity and visual impact in this largely residential area. Despite its industrial designation, it currently contains a mix of uses which include residential and leisure and therefore is more aligned to the 'Mixed Use Former Industrial Employment Areas' (MUFIEAs) allocation in the Local Plan.

The MUFIEA allocation allows for a residential component on site where net employment floorspace equivalent to at least existing employment space is provided, in particular space for small and medium sized enterprises. We have made representations on this policy under 3.2.2 below.

In the absence of an up to date evidence base, it is difficult to comment on whether complete de-designation of the area or re-designation to a MUFIEA type allocation would be most appropriate. To establish this, the Employment Land Review evidence document will determine how much industrial floorspace is needed in Wandsworth overall. What is clear however at this stage even without the floorspace need information is that the Bendon Valley LSIA is not fit for or operating as its allocated purpose.

If the report concludes that there is sufficient floorspace available in other strategic locations in Wandsworth to meet the needs of those sectors which are expected to be maintained and/or grow, it would be appropriate to de-designate all or parts of the Bendon Valley LSIA to allow for much needed residential development. However, if the report concludes that some employment floorspace is still required, given the existing mixed use nature of this site and its neighbouring residential use, it would be appropriate to allocate the site for mixed use including residential.

3.2.2 Mixed Use Former industrial Employment Areas

Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas

As outlined in our response to 3.2.1, we believe that Bendon Valley should be either de-designated entirely or at least re-designated to a MUFIEA type allocation due to its existing mix of employment, residential and leisure uses and its very close proximity residential areas.

The current MUFIEA policies allow for a residential component where:

- Net employment floorspace equivalent to at least existing employment space is provided. In particular space catering for small and medium sized enterprises will be sought.
- New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment area.
- Existing surrounding uses will not have an adverse impact on the amenity of new residential space.

Whilst we agree with this approach in general, the requirement to provide net employment floorspace equivalent to at least existing employment space 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 London³ 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 sought in MUFIEAs which would allow the replacement of the equivalent number of jobs rather than the equivalent employment floorspace.

3.2.3 Offices

Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?

As outline above, 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 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.

3.2.4 Waste

It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and sites in the Employment and Industry Local Plan document.

Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities?

No comments on waste at this stage.

³ LOPR Update 2014 <https://www.london.gov.uk/what-we-do/planning/london-plan/london-office-policy-reviews>

3.3 Spatial Approaches

The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.

Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?

No comments on spatial approaches at this stage.

3.4 Specific Policies

Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?

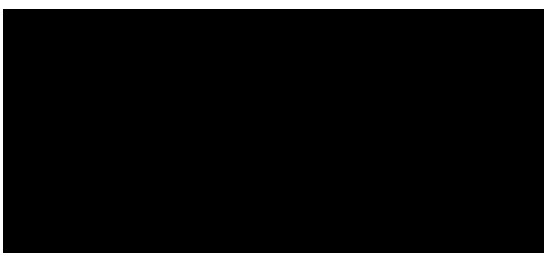
Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?

Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?

No comments on specific policies, other than those already discussed above in our response to 3.2.2 in relation to the replacement of employment floorspace in MUFIEAs and the re-designation of the Bendon Valley LSIA in our response to 3.2.1.

We request that all of the comments above and in the attached appendix are considered as part of the Employment Land Review process and request the opportunity to be involved in the work of the consultants once appointed. We understand from discussions with your officers that there will be further opportunity to submit information to the consultants as part of the Employment Land Review process and request to be notified when this opportunity arises.

Yours sincerely



Helen Courtney
Senior Planner

Tel: 0203 268 2446

Email: helencourtney@boyerplanning.co.uk

APPENDIX A: 38 – 54 LYDDEN ROAD SUPPORTING DOCUMENT

Introduction to the Site

1.1 Our client's site is 38 – 54 Lydden Road, Wandsworth, SW18 4LR. It is a single building currently split into 5 units containing 6 businesses as set out in Table 1 below. The site is within the Bendon Valley Locally Significant Industrial Area (LSIA) in the adopted Wandsworth Local Plan. However, as demonstrated below the condition of our client's site and the wider LSIA is deteriorating and are in need of investment and possible redevelopment in the mid to long term.

Table 1 – Current Occupiers at 38 – 54 Lydden Road

Address	Occupier	Type of Business	Type of premises	Floorspace (sqm)	Use Class	Estimated Employees
38-42 Lydden Road	D & M Coachworks	Maintenance And Repair Of Motor Vehicles	Vehicle Repair Workshop and Premises	649	SG	4
44 Lydden Road	B A F Graphics Ltd (main unit over the road)	Printers	Workshop and Premises	212	B8	0*
46-50	Juno Glass Ltd	Glaziers	Workshop and Premises	646	B1c	9
52 Lydden Road	London Spray Finishes Ltd and Osbond & Tutt	Spray finishes and French polishing	Workshop and Premises	248	B1c	5
54 Lydden Road	Lethbridge Lines	Joinery and Carpentry	Workshop and Premises	362	B1c	7
Total				2,118		25

* This unit is used as ancillary storage to the main BAF building located across the road at 25-27 Lydden Road

- 1.2 The units are mostly in light industrial (B1c) use and are all occupied by small businesses of less than 10 employees. One unit (number 44) appears to be linked to a company based across the road (BAF Graphics). Units 38-42 are currently in Sui Generis use as a vehicle repair workshop (B & M Coach Repairs).
- 1.3 The building has 2,100 sqm floorspace¹ and currently provides around 25 jobs. Despite the fact that the building is currently fully occupied, this only results in a job density of 85 sqm per job. The Homes and Communities Agency (HCA) Employment Densities Guide states that the average density for B1c use is around 47 sqm per job, which is considerably higher than the density of 38-54 Lydden Road. A density of 85 is lower than the expected density of large scale and high bay warehousing (B8) which is around 80 sqm per job.

¹ Source: VOA

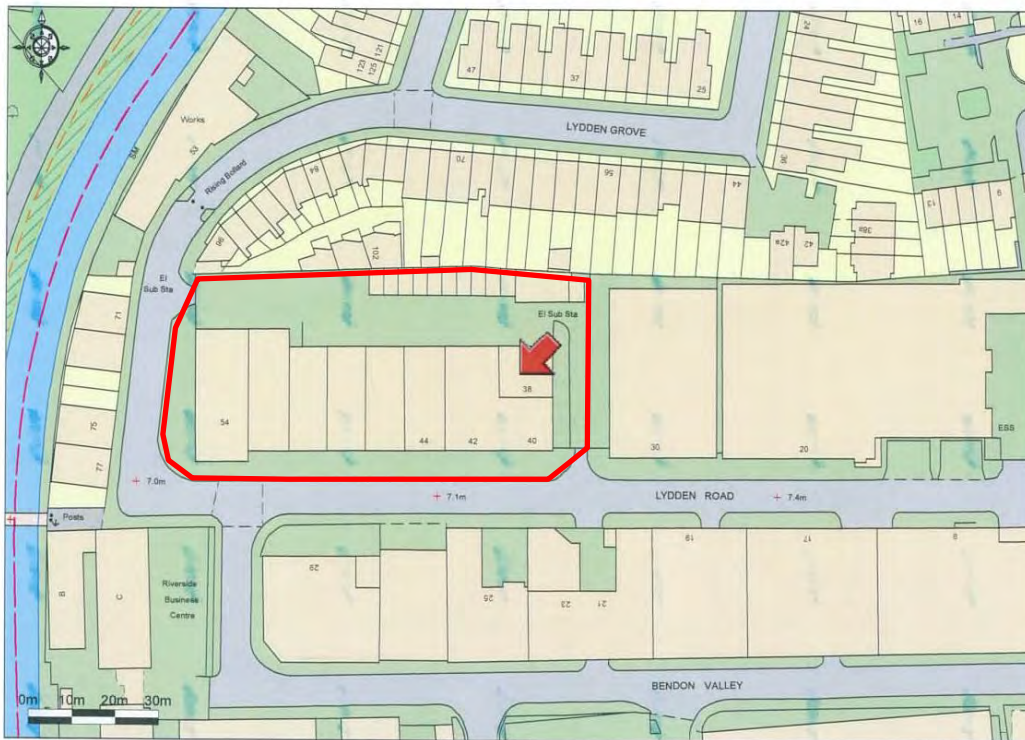


Figure 1 – Location of 38- 54 Lydden Road

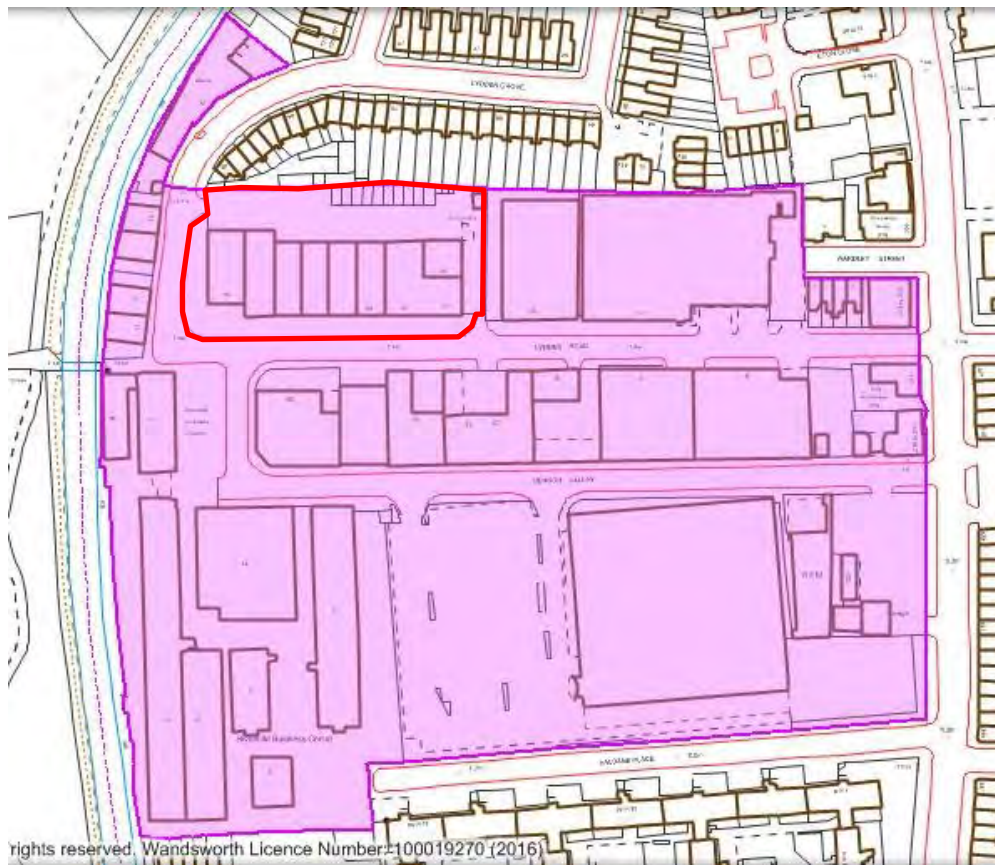


Figure 2 – 38-54 Lydden Road and wider Bendon Valley LSIA (in purple)²

² Source: Wandsworth Interactive Local Plan Map

- 1.4 The building was built in the early 1960s and is therefore now over 50 years old. It is a single storey brick building with a flat roof and although appears to be in reasonable condition considering its age, many buildings of this age and type are likely to experience issues such as leaking roofs and poor energy efficiency. It is likely that the building will need to be redeveloped in the mid to long term. See photographs below of the condition of the building.
- 1.5 Many of the current occupiers have owned these premises for a number of years however; it is questionable whether buildings of this age and condition would meet the needs of modern businesses if the current occupiers were to leave. Some of the business owners have stated that they are reaching retirement and have expressed intentions to vacate the site within the next 5-7 years. Other sites are currently leased and the intentions of the occupiers are not currently known.
- 1.6 As shown in Figure 1, the site is immediately adjacent to residential properties to the north. This creates potential amenity issues relating to noise and traffic movements and is likely to restrict any future industrial redevelopment to those which are acceptable within a residential area.

Photographs of 38-54 Lydden Road



Unit 54 Lydden Road



Unit 52 Lydden Road



Units 46 to 50 Lydden Road



Unit 44 Lydden Road



Units 38-42 Lydden Road



Yard/parking area (from Lydden Road entrance) with the adjoining residential in the background



Yard/parking area (from Lydden Grove entrance) with adjoining residential in the background



38-54 Lydden Road all buildings

Wider Bendon Valley LSIA Site

- 1.7 As described above, 38-54 Lydden Road is within the Bendon Valley LSIA. Bendon Valley is a small industrial area of around 4.8ha in size and is located off Garratt Lane. It is bounded to the north, south and east by residential areas and by the River Wandle to the west.
- 1.8 Despite its industrial allocation, the LSIA contains a mix of uses including employment, residential and leisure. Part of the LSIA to the north-west contains residential properties (Wardley Road) and there are some former offices to the west of the site that have been converted to residential use under the changes to permitted development rights (Class O formerly Class J)³. There is also a pub (the Jolly Gardner) within the LSIA boundary. The LSIA site also includes a now vacant Mecca Bingo Hall which we understand is subject to a planning application for its conversion into an indoor trampoline centre (D2 Use Class)⁴.

³ Application Refs 2014/614 and 2015/4412

⁴ Application Ref 2015/7403

- 1.9 Whilst we have not yet conducted a full survey of the wider LSIA site, we have broadly estimated that there is a density of around 72 sqm per employee⁵. However, the majority of these jobs are within the Riverside and Earlsfield Business Centres and if these were excluded from the figures, the rest of the site would have a much lower density.
- 1.10 There are several parts of the LSIA which are vacant and/or derelict including the former Safestore and Europcar sites (which are currently being demolished), the former Mecca Bingo Hall (and surrounding car park) and unit 17 Bendon Valley which is being advertised to let. There are also some units within the Riverside and Earlsfield Business Centres currently being advertised to let.
- 1.11 Parts of the area are poorly kept and fly tipping, general littering and graffiti were all observed during our visit to the site (see photographs below). There were also issues with on-street parking observed in some parts of the site which were causing issues for delivery vehicles attempting to turn.

Photographs of the wider LSIA site



Former Europcar and Safestore site (currently being demolished)



Former Mecca Bingo Hall



Car park of former Mecca Bingo Hall



Vacant warehouse to let

⁵ Based on desktop research alone and therefore should be seen as a rough estimate due to reliability of employee data



Riverside Business Centre



Newer Building on Bendon Valley (Mr Resistor)



Units on Lydden Grove



Yard on Lydden Grove



Residential properties immediately adjacent to the LSIA on Lydden Grove



Vacant Unit on Bendon Valley



Earlsfield Business Centre



Crew Clothing Head Office Building



Rear of residential properties within the LSIA



Rear of Safestore/Mecca Bingo Site



Residential properties to the south of the LSIA (Haldane Place)



Residential and retail properties to the west of the LSIA (Garratt Lane)

From: Planning Policy <PlanningPolicy@richmond.gov.uk>
Sent: 28 January 2016 13:02
To: PlanningPolicy
Subject: RE: Wandsworth Local Plan: employment and industry review – preparation stage

Thank you for consulting the Council on the proposed Employment & Industry Land Review.

As discussed in our recent Duty to Cooperate meeting on 15 January 2016, both Councils share common concerns regarding the loss of employment floorspace and industrial land. This is also one of the key drivers for Richmond's Local Plan Review to strengthen the economic focus and protect employment land, particularly in the light of significant loss of offices to residential through prior approvals across the borough.

There are benefits that both neighbouring boroughs are taking a similar approach, and the London Borough of Richmond upon Thames supports the review by Wandsworth Council.

The detailed approach is more appropriate for each borough to consider, however we look forward to continuing to engage as the evidence base and detailed policy approaches are prepared.

Kind regards,

Andrea Kitzberger-Smith
Planning Policy Manager



Planning Policy Housing & Community Services
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

06 January 2016

Dear Sir / Madam

Wandsworth Council: Local Plan: Employment and Industry Review
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

Laura Kelly
Town Planner, National Grid

laura.kelly@nationalgrid.com

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

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Laura Kelly, National Grid

From: Behnke, Piotr (NE) <Piotr.Behnke@naturalengland.org.uk>
Sent: 28 January 2016 15:30
To: PlanningPolicy
Subject: Natural England Response - Employment and Industry review – preparation stage
Attachments: NE Feedback Form - 2015.pdf

FAO: Martin Howell,

Dear Mr Howell,

Thank you for your correspondence in respect of the Wandsworth Local Plan: employment and industry review, this is much appreciated. Having taken a look at this consultation in particular it is clear that Natural England would have no comments to make in relation to this particular topic area as it doesn't fall within our remit.

I trust that this is sufficient for your purposes, and thank you again for keeping Natural England advised as to the progress of the Wandsworth Local Plan.

Regards,

Piotr Behnke
Adviser
Sustainable Development and Regulation
Thames Valley Team

Natural England,
Area 3A Nobel House,
17 Smith Square,
London
SW1P 3JR
Tel: 0300 060 1963

www.gov.uk/natural-england

If you have just sent me a land use consultation, please resend to consultations@naturalengland.org.uk or, for any other land use query, please contact our Land Use Planning Enquiry line (0300 060 3900) in the first instance.

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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DP3575

28 October 2015



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

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
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Dear Sir,

WANDSWORTH EMPLOYMENT AND INDUSTRY REVIEW – PREPARATION STAGE

SUBMISSION OF REPRESENTATION TO EMERGING EMPLOYMENT AND INDUSTRY REVIEW LOCAL PLAN

On behalf of our client, Office Estates Limited, we wish to make the following representations to the recently published 'Wandsworth Local Plan: employment industry review – preparation stage' document.

Representation

We have the following comments concerning the Council's approach to the preparation of the Employment and Industry Review Local Plan document:

1) Overall Approach / Reasons for the Review:

We consider that the overall approach, to produce a single Employment and Industry Review Local Plan document, represents a reasonable and logical way to assess the local economic and employment needs of the Borough.

The reasons for the review are supported: it is agreed that the Council has 'a responsibility to plan for the business need for land and premises in the area', and the forthcoming review of employment land within the Borough will provide a solid basis for the Council to review its existing employment- policies within its Local Plan.

2) Strategic Issues: Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA)

We welcome the Council's intended review of its approach concerning Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA). We consider that a more flexible approach to development proposals within these areas would be reasonable, where

28 January 2016

Page 2

the underlying objective of planning policy is to protect and encourage employment growth and economic activity.

It is considered that where it can be demonstrated that a mix of uses, including residential, can co-exist on such sites, in such a way that modern design can overcome the traditional view that the non-industrial uses would lead to the curtailing of business activities, then other such uses should be encouraged. Other uses can help deliver other benefits of the Development Plan, such as the creation of sustainable, mixed and balanced neighbourhoods within the Borough.

With regards to the type of criteria which should be considered when prioritising potential SIL and LSIA sites for release, it is considered that any such sites within Opportunity Areas should specifically be prioritised. In doing so, their release can help deliver the aspirations for these areas which seek to support high density housing, mixed-use commercial intensification and transport improvements

3) Strategic Issues: Offices

We consider that various sites outside of town centres and focal points of activity are also capable of delivering high quality, sustainable office developments within the Borough, where they benefit from good transport links. As such, we would support more flexibility within the emerging Employment and Industry Review Local Plan document concerning this issue.

We look forward to receiving confirmation of receipt of our comments, and to being involved with future consultations as the review and preparation of the document progresses.

Should you wish to discuss further, do not hesitate to contact either Tim Holtham or Colin Sinclair at the above office.

Yours faithfully,



DP9 Ltd

**GERALDEVE**

Planning Policy
Housing & 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

22 January 2016

Our ref: NEH/KWEW/AKG/J7696

Your ref:

Dear Sir/ Madam

**61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY.
Site Representation under the Employment Land Study**

We are representing our client, Panorama Antennas Limited, in the promotion of their land at 61-63 Frogmore, London, SW18 1HF ('The Site'), for its release from solely employment land use in order to allow for mixed use development, whilst retaining a significant level of employment provision.

We are aware that, as part of a new Employment Land Study, the London Borough of Wandsworth (LBW) are currently inviting representations of this nature borough-wide to identify land currently used as employment premises or industrial land which would be suitable for residential or mixed-use redevelopment.

Our client seeks to secure the release of their land under the new Employment Land Study. They wish to reconfigure their employment land through rationalising their operations, thereby allowing for space to develop residential units, creating a mixed-use site. Harrison Architects + Designers Ltd have already undertaken feasibility analysis to identify scheme options comprising both employment and housing and, in due course, we envisage holding formal pre-application discussions. In the meantime, if Policy Officers would like to meet so that we can present the initial ideas and concepts we would be pleased to do so.

Our Position

Gerald Eve has been instructed to engage with the policy process, and promote the site for mixed-use redevelopment, releasing it from its current employment designation. Panorama Antennas Limited are underusing the land and seeking to rationalise their operations which will free up space for supplementary uses, including residential.

Planning policy at all levels provides a positive framework for the release of surplus employment land in favour of mixed-use / residential development, as summarised below.

National Planning Policy Position

Paragraph 22 of the National Planning Policy Framework (NPPF, 2012) suggests that employment land allocations be regularly reviewed by local planning authorities. Where there is little prospect for

employment use, applications for the alternative use of that land or buildings should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities. Also, according to NPPF Paragraph 158, local planning authorities should ensure their assessment of, and strategies for, housing and employment uses are integrated, again taking full account of relevant market signals.

Relevant market signals at The Site suggest that releasing this employment land site for mixed-use (residential and employment) development would respond to the housing-land supply requirements in LBW whilst also allowing for our client to efficiently rationalise their operations and increase the overall productivity of their land.

Local Planning Policy Position

Paragraph 4.42 of the Wandsworth Local Development Framework Core Strategy (2010) demonstrates LBW's proactive attitude to the identification, both of potentially suitable employment land, and also land within the borough which is no longer 'meeting contemporary needs'. This reflects NPPF Paragraph 22 which states that 'planning policies should avoid the long term protection of sites allocated for employment where there is no reasonable prospect of a site being used for that purpose.'

Our client's redevelopment ambitions for The Site are in-keeping with this policy then, as they wish to reconfigure their employment land as a consequence of underutilisation, thereby creating space for residential accommodation. This will make the land more productive in both land use requirements and contribute towards LBW's housing delivery.

Core Strategy Policy PL6 'Meeting the needs of the Local Economy' states that mixed use redevelopment of employment sites will be acceptable where: 'new uses are compatible with the neighbouring uses and will not harm the viability of the surrounding employment area' and 'existing surrounding uses will not have an adverse impact on the amenity of new residential space'. The Site presents an opportunity in both cases. The proposed residential element on The Site will allow for the retention of employment land use as it will be reconfigured to be more fit-for-purpose for our client's operations. Moreover, given the proliferation of residential development in the immediately surrounding area, the amenity of any residential units proposed at The Site would reflect the changing character and amenity of this area.

Considerations Regarding the Surrounding Area

In direct response to the recently published LBW document (December 2015), we consider that with regards to point 3.2.1 'Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)' our site should be considered for release.

The Site is within an LSIA surrounded by large-scale residential redevelopments. We believe that this is an area of the LBW where significant opportunities for housing have been identified, demonstrated by the volume of permitted residential and mixed-use developments. These include redevelopment of the:

- RAM Brewery Site in Wandsworth Town,
- Shell oil terminal on the west side of the River Wandle, along the Thames,
- Osiers Road and Eastfields Avenue,
- Gas Holder Site.

In addition, LBW have previously accepted the Wentworth House site for release within the LSIA. This further demonstrates that new development, beyond solely employment use, in this area is deemed appropriate by LBW.

Moreover, at the rear of the property (10 Dormay Street) it is considered sensitive design would improve the existing utilitarian, light industrial brick frontage. Given The Site's neighbouring location to heritage assets, redevelopment would therefore present an opportunity to enhance the character and appearance of Dormay Street, Grade II listed Wentworth House and the surrounding area.

On this basis, The Site is located within an appropriate area where mixed-use (including both employment and residential) should be encouraged and has been deemed acceptable in the recent past by LBW.

Concluding Remarks

Our client's proposal of mixed-use redevelopment (residential and employment) at The Site is in-keeping with national and local policy, whilst also reflecting the climate of development in the immediate surrounding area.

This site is suitable for release from solely employment use to provide fit-for-purpose, rationalised employment space and deliver housing to assist with meeting delivery targets.

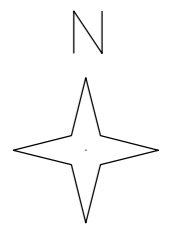
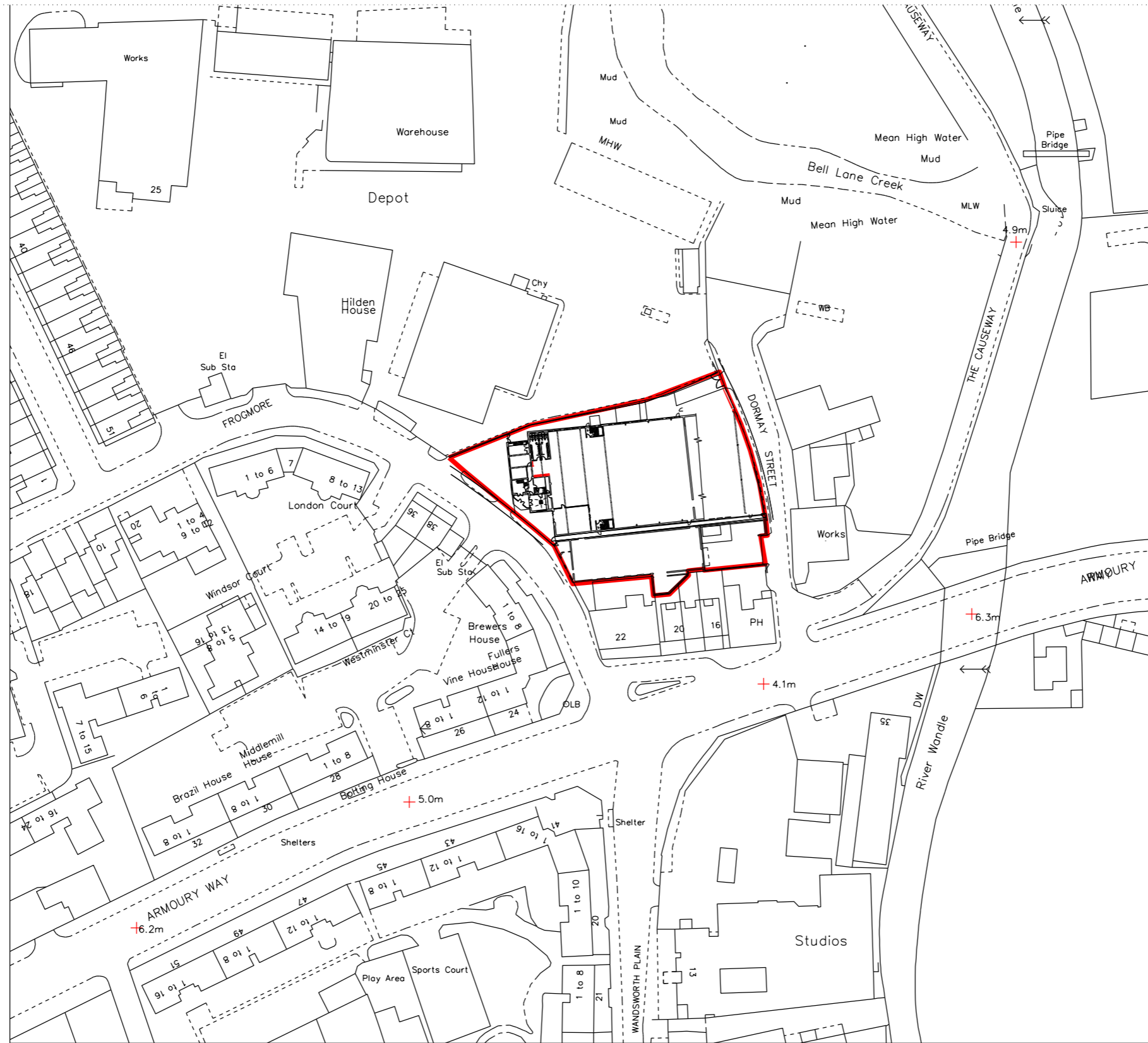
We trust that these representations will be taken into account by the Council at this early consultation stage and we would be grateful to be kept informed of matters as the employment land review progresses. As mentioned at the outset, we would be pleased to meet with members of the Planning Policy team to discuss and present the initial concepts and designs for a mixed-use redevelopment at The Site.

If you have any queries please contact Kevin Watson (0207 333 6388) or Anna Gargan (0207 518 7240) of this office.

Yours faithfully


Gerald Eve LLP

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



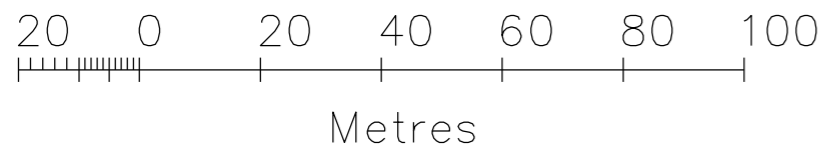
Notes:
1. For Planning Purposes only

Revision:

**HARRISON ARCHITECTS
+ DESIGNERS LTD**

Project **Panorama Antennas
(61-63 Frogmore, London, SW18 1HF)**

Drawing title **Site Location Plan**



17 Chester Close Lower Common South
London SW13 0JE
T 0208 780 1021
E aharrison@harrisonarchitects.uk.com

Scale 1:1250 @ A3 Drwg. No. 165 PL001

Date 8.01.2016 Rev.

Status For information For tender For construction

All dimensions to be confirmed on site.
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Wandsworth Local Plan: employment and industry review (Dec 2015)

Mr Alan Pates
 68A Kelmscott Road
 London
 SW11 6PT



Consultee ID	Name	Title	Number	Comment
960899	Mr Alan Pates	Overall Approach	3.1	Yes
960899	Mr Alan Pates	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	I think it is very important to protect land used for employment from residential development. Employment land within the Borough is being gobbled up by housing developers. It is very important to maintain employment to provide a mixed economy. Local employment is vital to keep local shops and services in business and also to reduce the need to commute longer distances for work. Once the local employment goes and the shops and services with it the character of areas is changed for ever. We need to keep the daytime activity on the streets of the Borough to keep it vibrant.
960899	Mr	Mixed Use Former industrial Employment	3.2.2	It is very important to keep mixed use in areas to keep life on the streets during the day, to support local shops and services etc. There seems to be a tendency for

Consultee ID	Name	Title	Number	Comment
	Alan Pates	Areas		developers only to provide expensive office space in order to meet their commitments, which when unsurprisingly when they can't let it, they can convert into residential space. We also badly need business start up kinds of spaces, spaces where someone could start a small manufacturing process, workshops for small enterprises such as fashion designers etc, railway arch kind of space.
960899	Mr Alan Pates	Offices	3.2.3	Yes.
960899	Mr Alan Pates	Waste	3.2.4	Appropriate

From: Owen, Lucy <lucy.owen@pla.co.uk>
Sent: 07 January 2016 12:19
To: PlanningPolicy
Subject: Wandsworth Local Plan: Employment and Industry Review - Preparation Stage

Thank you for consulting the PLA about the Wandsworth Local Plan Employment and Industry Review. As you are aware from the PLA's representations on the recent Local Plan Review, the protection of the Borough's safeguarded wharves, in line with the requirements of the NPPF and policy 7.26 of the London Plan is imperative to prevent their loss to housing. This was the very reason why safeguarding was implemented in London and I have set out below for your information the background on wharf safeguarding:

Background on Wharf Safeguarding

During the early 1990's, the PLA became aware that a disproportionate number of operational wharves in London were being redeveloped for alternative, higher value uses. Research undertaken by the PLA indicated that between 1987 and 1994, over 20 operational wharves had been redeveloped with a resultant and permanent loss in cargo handling capacity.

The PLA and the London Planning Advisory Committee (LPAC) were instructed by Government to prepare a list of wharves for protection. This work was presented to the River Thames Working Group and ultimately resulted in the publication, in February 1997, of Regional Planning Guidance Note 3B/9B (Strategic Planning Guidance for the River Thames). This Guidance refers to the need for wharf protection on the River Thames in London at Paragraph 3.52, which states that:-

"Many sites for freight transport and other river-related uses are under development pressure or have been lost within recent years: they are a diminishing and finite resource."

The strategic policy context underpinning the principle of safeguarding riparian wharves in London was provided at paragraph 3.53, which states that:-

"The Secretary of State therefore considers it is important in the broader strategic interest that some sites which are currently, or could potentially be, used for the transshipment of freight, including waste and aggregates, and for river related activities, should be retained and safeguarded against development that could preclude their future use for these purposes."

To accompany RPG3B/9B the Secretary of State for the Environment identified 32 wharves suitable for cargo handling that should be safeguarded. Directions were served to Local Planning Authorities under Section 12 (7A) of the Town and Country Planning Act 1990 (which required authorities to have regard to the maintenance of specified wharves in formulating their development plans) and under the Town and Country Planning (General Development Procedure) Order 1995 (SI 1995/419) concerning the handling of any planning applications received for these sites.

On assumption of his planning powers in July 2000 through the Town and Country Planning (Mayor of London) Order 2000, (SI 2000/1493) (now replaced by the Town and Country Planning (Mayor of London) Order 2008), the Mayor was required to be consulted on planning applications affecting any part of a safeguarded wharf. The Mayor was also given power to direct local planning authorities to refuse planning applications affecting any part of a safeguarded wharf. New directions, reflecting these statutory changes, were served on relevant local planning authorities.

The Directions play an important role in protecting lesser value uses – enabling the wharves to be retained for the purpose for which they are protected: waterborne cargo handling uses. Once a wharf is lost, it is lost forever.

The Mayor of London indicated in Towards the London Plan, published in 2001, that the status of both the extant and other wharves proposed for safeguarding would be reviewed periodically.

The London Plan Implementation Report: Safeguarded Wharves on the River Thames was published in January 2005, and submitted to the First Secretary of State for his consideration. The report recommended that of the 28 wharves safeguarded at the time, 25 wharves, should retain their status. A further 25 wharves, principally located downstream of the Thames Barrier were also recommended for safeguarding.

It was confirmed, in June 2005, that the First Secretary of State concurred with the Mayor of London's recommendations contained within the Implementation Report, and accordingly issued new directions where appropriate so as to formally safeguard a total of 50 wharves.

In accordance with commitments made within the published (2011) London Plan the Mayor, together with his project partners, commenced a review of all the safeguarded wharves within London and to consider whether it is appropriate to safeguard facilities on the canal network. A consultation document was subsequently produced in October 2011 entitled Safeguarded Wharves Review 2011/2012. As a result of consultee comments and to provide clarification and updates in terms of national policy, a second more limited consultation was undertaken in 2012. The resultant document, Safeguarded Wharves Review Final Recommendation – March 2013 is now with the Secretary of State for approval. Nine safeguarded wharves are recommended for release and one additional wharf is proposed for safeguarding.

London Plan policy 7.26 protects safeguarded wharves for waterborne freight handling uses only; supports proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves currently not handling freight by water and; requires developments adjacent or opposite safeguarded wharves to be designed to minimise the potential for conflicts of use and disturbance.

Proposed Review

There is no in principle objection to the production of a single Employment and Industry Local Plan document but the scope of the document must be clear and the protection required through the London Plan must be given to the Borough's safeguarded wharves. At the moment it would appear that Core Strategy Policy PL9 (which safeguards 5 wharves for transshipment of freight) is not included in the review however it is noted that the policy approach to waste sites will be reviewed. As you will be aware two of the Borough's waste sites are located on safeguarded wharves (Cringle Dock and Smugglers Way) and therefore the review will need to ensure that any policy approach to waste sites reflects policy 7.26 of the London Plan and the London Plan's waste policies.

Regards

Lucy

Lucy Owen

Deputy Director of Planning and Environment

Port of London Authority

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Find out about the Cleaner Thames campaign:

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

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website: www.pla.co.uk

Wandsworth Local Plan: employment and industry review (Dec 2015)

Putney Society
 Mr Mark Poulter
 Deputy Buildings Panel Convenor
 1 Ernshaw Place
 Putney
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 SW15 2BT

Putcom@putneysociety.org.uk

Consultee ID	Name	Organisation	Title	Number	Comment
969030	Mr Mark Poulter	Putney Society	Overall Approach	3.1	Yes. Agree with the need for an overall plan, with an overarching target to maintain employment floor space in all categories. If there is a target, then it should be monitored to ensure that it has been achieved.
969030	Mr Mark Poulter	Putney Society	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	Employment levels are clearly falling. 100% replacement of B Class floor space should be required. The gasholder contains very little employment, so is likely to get listed as 'brownfield' under the H & P Act before this policy review gets finished. No others unless they are on roads unsuited to HGVs
969030	Mr Mark Poulter	Putney Society	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	Yes. Employment levels are clearly falling. 100% replacement of B Class floor space should be required. The gasholder contains very little employment, so is likely to get listed as 'brownfield' under the H & P Act before this policy review gets finished. No others unless they are

Consultee ID	Name	Organisation	Title	Number	Comment
	Poulter				on roads unsuited to HGVs.
969030	Mr Mark Poulter	Putney Society	Mixed Use Former industrial Employment Areas	3.2.2	Yes. All B class uses
969030	Mr Mark Poulter	Putney Society	Offices	3.2.3	Yes. Town centres are where offices should be located and policies should be much tougher on loss of existing. The policy for where to develop new offices is sadly not that relevant.
969030	Mr Mark Poulter	Putney Society	Waste	3.2.4	Yes. We are going to continue to need waste sites. Lots of new homes in addition to more recycling has increased demand for processing, so existing sites and relevant land next to them needs to be safeguarded.
969030	Mr Mark Poulter	Putney Society	Spatial Approaches	3.3	<p>Yes. We should have spacial strategies. Town centre plans are entirely appropriate. The detail SSADs are an excellent idea but it is hugely disappointing that little attention is paid to them when applications are being determined. More attention seems to be paid to justifying why they should not be adhered to rather than why they should.</p> <p>We are unhappy with the comment that such approaches might “overburden development partners”. This suggests that individual developers have a special relationship with the Council that might a.</p>

Consultee ID	Name	Organisation	Title	Number	Comment
					override the interests of existing residents and b. the fundamentals of local neighbourhood planning indicates where and what is judged appropriate for an area and it is not for a commercial developer to determine and force through the largest most inappropriate thing that they can get away with. The use of the phrase shows a deep misunderstanding of what planning policies are for. They are supposed to be a burden, justified by public benefit. 'Sustainable' development is supposed to mean something that makes long term sense, not 'maximum'.
969030	Mr Mark Poulter	Putney Society	Specific Policies	3.4	Part 1. NO. The policies would have been satisfactory if they had been applied but they have not and thus they have failed dismally to protect the existing supply. Demand exceeds supply and there are no redundant premises, just ones that the owners for some reason don't let or do not want to let. Demand for office space in Wandsworth will increase again as a result of the H&P Bill. The Council has also allowed the words "office" and "commercial" to become confused. "Office" space has been allowed to transmute into "commercial" space allowing higher wage professional workspace to be confused with smaller numbers of living wage retail jobs. Developers misrepresent the viability of offices by allowing offices to fall into disrepair and Council allows them to get away with this, all driven by the vastly increased profit developers make from obliterating office space, reducing employment, and being allowed to turn the space into residential.

Consultee ID	Name	Organisation	Title	Number	Comment
					<p>Part 2 Support of small businesses. Yes. Do part 1. Stop allowing the loss of small offices and working premises(compounded by PD). People need other services to live in a well-rounded, fully functioning community not just another chain supermarket or the 23rd coffee shop. Erico House on the URR, Lenta offices oversubscribed. There is an oversupply of shops in some areas, but these convert easily to small offices. Shortage of space = high rents which is bad for ANY type of business.</p>



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

Martin Howell
Planning Policy
Housing and Community Services
Town Hall
Wandsworth High Street
London SW18 2PU

Sent by email: planningpolicy@wandsworth.gov.uk

My reference: Wandsworth LP: Employment and industry review
Please ask for: Chris Turner

15 January 2016

Dear Mr Howell

Wandsworth Local Plan: Employment and Industry Review

Thank you for giving the Royal Borough of Kensington and Chelsea the opportunity to respond to the London Borough of Wandsworth's Local Plan: Employment and Industry Review.

You will no doubt be aware that Wandsworth has been working closely with Kensington and Chelsea, Hammersmith and Fulham, Lambeth and the Old Oak Park Royal Development Corporation, as Waste Planning Authorities, to produce a joint evidence base and an "Engagement Statement", regarding the authorities' waste apportionments. Currently all of Kensington and Chelsea's municipal waste goes to the Western Riverside Waste Authority's facilities in the London Borough of Wandsworth for transfer and treatment. It is essential that the existing waste management facilities are not prejudiced by the release of existing employment or industrial land to other uses. This could be through the release of the actual sites themselves or by the development of adjoining sites in ways which may prove incompatible with the neighbouring waste use.

The sites of particular importance to Kensington and Chelsea Council are the Western Riverside Transfer Station near Wandsworth Bridge and the Cringle Dock Transfer Station next to the Battersea Power Station site.

These comments are made in light of the statutory Duty to Cooperate which places a legal duty on Councils to engage "constructively, actively and on an on-going basis" in "maximising the effectiveness" of Local Plans relating to "strategic matters" which may impact on at least two planning areas including in connection with infrastructure which is strategic¹. The Duty applies to

¹ S331 Planning and Compulsory Purchase Act 2004; NPPF paragraphs 156; 178-181; NPPG Duty to Cooperate

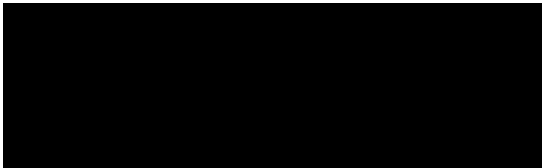
activities relating to the preparation of 'Local Plan' documents and supporting activities, so far as relating to a strategic matter. It is considered that the Wandsworth Local Plan: Employment and Industry Review must be prepared in accordance with the Duty for these reasons. Within London, the National Planning Practice Guidance (NPPG) on the Duty to Cooperate considers that the extent of any cooperation required will depend on the extent to which strategic issues have been addressed in the London Plan².

In light of this, the Council would welcome the continued engagement and dialogue.

Aside from this we have no further comments on the review at this stage. We look forward to being consulted further as the review progresses.

I trust you will find these comments useful. If you have any queries regarding the Council's response, please do not hesitate to contact my colleague, Chris Turner.

Yours sincerely,



Jonathan Wade

Head of Forward Planning
Planning & Borough Development

² Paragraph 007

27th January 2016

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Dear Sir/Madam

RE: REPRESENTATIONS – WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – PREPARATION STAGE (DEC 2015)

We write in response to your consultation exercise on the Wandsworth Local Plan: Employment and Industry Review – Preparation Stage Document. We submit this response on behalf of our client 'Safestore Ltd' who owns three sites located within the London Borough of Wandsworth.

Background

Safestore Ltd owns and occupies three sites within the borough; these sites are located at Ingate Place and 19 Lombard Road in Battersea and 1 Bendon Valley on Garratt Lane.

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).

Employment uses are the established land use allocations for these three sites. However, like many employment sites within the borough these sites are not currently optimising their full potential to improve 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.

Strategic Policy Position

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.

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.

Format and Principle of Review

Overall, our client supports the principle of undertaking a borough wide employment and industry review.

We support the proposal to carry out a partial review of these aspects of the Local Plan documents for the borough. We also welcome that the fact that the Council proposes to consider the potential for sites and areas currently allocated for industrial use to be reclassified to allow other uses to come forward within these areas through the production of Area Spatial Strategies.

It is stated in the consultation document that the Council has a responsibility to plan for the business needs for land and premises in the area and commitment to creating an improved environment and framework to grow the borough's business base and encourage more private sector investment and we fully support and welcome this approach.

The Review and Current Context

As a leading storage company Safestore Ltd undertake regular reviews of their asset portfolio to determine where and how to channel investment to best optimise the potential of their sites. Our client recognises that Wandsworth is a valuable location for their business and that investment is required in all three of their sites. However greater incentive is required to encourage this investment to come forward.

Safestore Ltd are committed to delivering investment in a manner that would enable them to continue to operate their core business within the borough of Wandsworth but that also presents opportunities to enhance the role each site can play in meeting the Council's strategic objectives.

In considering the future of their sites, Safestore are clear that each approach needs to be developed in line with operational requirements, existing use mixes and wider economic drivers. They hope that the Employment and Industry Review and its supporting evidence are undertaken in a similar vein – developing a detailed understanding of activity within sites today and then considering how this leads to future opportunities for development and regeneration.

We would therefore encourage the forthcoming evidence base to comprehensively assess how the floorspace within employment locations is currently being utilised, to identify current and future trends impacting employment sites and also the potential for such sites to deliver other priority uses. New policy recommendations should be based on these factors, in line with the key principles of the NPPF.

By way of an example, whilst the Ingate Place site is currently designated as SIL, the businesses and activities undertaken within it demonstrate that it is not currently operating as a typical SIL site. Although there is a large proportion of storage (B8 use class) floorspace within one building, the site also accommodates a substantial business centre that provides office (B1a use class) and workshop spaces for a range of high value professional service, technology and craft based businesses.

There is clearly a risk that the previous designation is simply 'rolled forward' irrespective of how the site is used today and how the context has changed, including the substantial regeneration of the Nine Elms Opportunity Area immediately to the east. Not only would this contravene guidance provided by the NPPF but would also underplay the economic value of Ingate Place and undermine future economic potential.

Approaching future site allocations based on their use rather than their designation may also allow the Council to make the case for new approaches to growth on employment sites to be adopted that better reflect local circumstances and opportunities. This could include taking a flexible approach to the delivery of mixed use development in sites that offer the most appropriate context and conditions where this allows their employment role to be enhanced. This would, in turn, not only help the Council achieve its economic aims but also address the London Plan housing targets for the borough.

The NPPF states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This should also be reflected in the evidence base which the imminent employment land review seeks to produce, to ensure adequate changes to planning policy can be amended where necessary.

A lack of flexibility would be less attractive for landowners investing in employment sites where work to improve and repair buildings are required. This could continue to result in buildings falling into an untenable state where they no longer support jobs. The overall quality of employment accommodation could decline as a result. Therefore an open minded approach to the employment land review should be undertaken to ensure that the future redevelopment of these employment sites is viable and their potential optimised to help the Council deliver the objectives of its development plan.

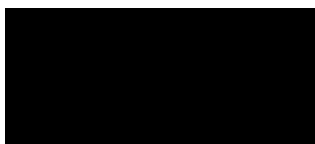
Summary

There is a clear emphasis at all levels of planning policy and governance to enable the delivery of economic development and new homes on highly accessible brownfield sites. It is therefore essential that the Employment Land Review provides a clear and succinct evidence base to support the partial review of the employment land policies within the Local Plan documents, giving landowners and developers the confidence to invest and facilitate high quality development in these locations. To do so we believe it is critical that the evidence base is developed in 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.

We are keen to positively engage with the Council during employment land review, contributing to the forthcoming Local Plan review. Safestore Ltd as a significant landowner of employment land in the Borough is keen to engage with the Council and take part in all necessary discussion to assist with the review. We would welcome the opportunity to meet to discuss our client's sites and look forward to working with the London Borough of Wandsworth and its appointed consultants in this regard.

If you have any queries or require any further information please do not hesitate to contact Adam Conchie (020 7911 2659) or Iain Buzza (020 7911 2054) at these offices.

Yours sincerely



GVA Grimley Ltd
On behalf of Safestore Ltd



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Planning Policy
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27 January 2016

Dear Sir/Madam,

Employment and Industry Review (preparation 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 Employment and Industry Review preparation stage 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.

National Policy Direction

Paragraph 17 of the National Planning Policy Framework (NPPF) states that 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. It continues that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth.

It is important to note that the Government is currently consulting on changes to the NPPF. The consultation document continues the Government's priority to make as much use of brownfield land in driving up housing supply.

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 and 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. Schroders welcomes the opportunity to respond to the Employment and Industrial Land Review in the context of its future aspirations for the Battersea Studios site and the surrounding area.



Battersea Studios and the surrounding area

Battersea Studios is located on the western edge of the Queenstown Road Strategic Industrial Area (SIL) in an area that is designated as an Industrial Business Park (IBP). To the west of the site is a logistics and distribution site which is also located within the IBP. To the south is a rail depot, the frontage of which on Silverthorne Road is within the IBP. To the north of the site is an access road leading from Silverthorne Road to the heart of the industrial zone and beyond this a warehouse. The remaining frontage to Silverthorne Road leading up to Queenstown Road, including part of the cement site, is also located within the IBP.

Paragraph 5.6 of the Development Management Policies Document (February 2012) states that the IBP is identified in the Local Plan for firms that need better quality surroundings, generally require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in Preferred Industrial Locations (PILs). The Park Town Conservation Area Appraisal notes that the Stewart's Road Study was prepared to look at how to make better use of the industrial area; improve accessibility to the area and the appearance of the public realm. Of particular importance is the treatment of the frontage to Silverthorne Road as a transition between the residential and industrial areas.

In this context, Schrodgers has been considering the opportunities presented for the IBP to act as a transition or buffer zone between the Park Town residential area and the heavier industrial uses in the SIL.

Wandsworth Local Plan: Employment and Industry Review

The preparation stage consultation document paragraph 3.2 'Strategic Issues – Strategic Industrial Locations and Locally Significant Industrial Areas' asks the questions "should we allow mixed use development or other uses in any of these areas and what other uses do you think are appropriate in these areas?".

While it is understood that the Council currently protects and promotes light industrial, general industry and storage and distribution within SILs, through Policy DMI1 'Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIAs)', Schrodgers considers that this consultation process represents an opportunity to consider how to promote a greater variety of uses within IBP locations and in particular on the site.

Schrodgers suggests that the Council should review the mix of uses that are appropriate to be located in the IBP, which could include housing. It also believes that there is an opportunity to masterplan the IBP to explore how it could achieve significant new mixed use development.

Schrodgers also considers that the consultation presents an opportunity to 'realign' the boundary of the IBP to create a more regular shaped zone. This could be achieved by bringing the eastern boundary back to a consistent line behind Battersea Studios.

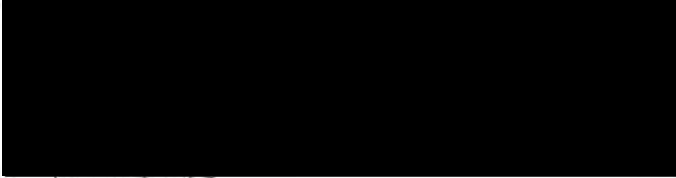
Summary

Schrodgers considers that the IBP, including Battersea Studios, presents an excellent opportunity to introduce a mix of uses, including housing, to the area which would complement and enhance the area's existing and future employment potential, and the contribution that the IBP makes in creating a transition between residential and heavier industrial areas.



On behalf of Schroders we welcome the opportunity to meet to discuss these representations with your team and to contribute to the Employment Land Study being prepared by the Council. If you have any questions please contact me or my colleague Vicky Cartwright (020 7303 4172).

Yours sincerely



Jeremy Castle
For Deloitte LLP



Comment

Consultee	Mr Anthony Seale (957836)
Email Address	[REDACTED]
Address	29 Mossbury Road London SW11 2PA
Event Name	Wandsworth Local Plan: employment and industry review (Dec 2015)
Comment by	Mr Anthony Seale
Comment ID	LPE11
Response Date	11/12/15 09:25
Consultation Point	3.1 Overall Approach (View)
Status	Submitted
Submission Type	Web
Version	0.1

Comment

Inclusion of large scale commercial land use

We need also to consider protection of larger commercial premises, such as large supermarkets (e.g. Clapham Junction ASDA and LIDL). These spaces provide hugely important services to the community but are also under threat from the disparity between commercial and residential land prices. This is particularly acute for commercial land with a larger footprint. Larger footprint stores provide particular benefits to the community in that they can cope with higher numbers of customers, provide a wider range of services, provide lower cost produce and are more family friendly. Dependence only on smaller, higher cost less family friendly supermarkets is likely to limit the area's ability to support families and those on lower incomes.

In future, there may also be demand for larger commercial premises for other commerce uses. It would be very difficult for larger commercial premises to reopen once land is split into many residential titles. Not protecting such land uses will lead to the homogenisation of areas as residential use and, by reducing the importance of focal points, decrease community cohesion.

The scope of this plan should therefore be extended to protect large scale commercial premises.

28th January 2016

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

Dear Sir/Madam

Re: Wandsworth Local Plan: Employment and Industry Review (preparation stage)

Boyer are instructed by St William Homes to respond to your recently published consultation on the Local Plan: Employment and Industry Review (preparation stage).

Our client has an interest in land and premises within the Central Wandsworth Locally Significant Industrial Area (LSIA).

This consultation response letter responds to the questions posed and also identifies the specific characteristics of our clients site and the wider LSIA which mean that it would be appropriate to consider de-designation or re-designation to 'mixed use' in the upcoming Employment and Industry Local Plan Review.

3.1 Overall Approach

Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?

Yes, it is agreed that producing a single Employment and Industry Local Plan document is the most appropriate approach in this instance.

The economy of London is changing rapidly and so are the space requirements of businesses. 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 planning framework has also changed considerably since the last Wandsworth Employment Land



Review 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.

The Wandsworth Employment Land Review was published in 2010 and the work to support this document will have been carried out prior to this, as such the 2010 Review will not fully reflect the changes described above and is therefore most likely out of date.

Given that a full review of the Local Plan is likely to take some time and that these policies were not included as part of the last review, it is agreed that this is the most appropriate approach in this instance.

3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)

Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?

The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so, which areas and why?

As mentioned above, the economy of London is changing and consequently so is the employment floorspace requirements of many business occupiers.

Despite overall job growth predicted in London, the latest GLA employment projections for London show a large decline in the sectors traditionally associated with industrial floorspace. By 2036:

- manufacturing is predicted to decline by 50%;
- wholesale by 27%;
- transportation and storage by 9%; and
- primary and utilities by 13%.

Sectors which are expected to grow over the same period are those mostly requiring office type floorspace. For example:

- the professional, real estate, scientific and technical services sector is expected to grow by 35%;
- accommodation and food service activities by 34%;
- information and communication by 34%; and
- administrative and support service activities by 28%.

This is likely to lead to a significant decrease in the need for industrial premises in London by 2036 and coupled with the increasing importance of service and technology based employment across London and

the need for housing, it is important that the balance between retaining industrial sites and providing for alternative land uses is carefully considered.

Whilst naturally these projections would need to be considered in more detail against other published projections and market signals, it is likely that the release of some industrial sites for other uses will be a conclusion of the Employment Land Review.

In light of the above, it is appropriate to review the LSIA's in the first instance as they are smaller, are of less strategic importance to London and are often located within or adjacent to what are primarily residential areas. Therefore, they should generally be considered for release prior to any release in the Strategic Industrial Locations (SILs).

The Central Wandsworth LSIA is immediately adjacent to Wandsworth Town Centre, which has undergone significant redevelopment in recent years and has the potential to deliver new housing through regeneration of the Ram Brewery site in the town centre, and immediately south of the LSIA.

Much of the land contained within the Central Wandsworth LSIA has, historically, been occupied by utilities infrastructure, which generates low levels of employment. It is appropriate to review the necessity of the allocation in this location given the changes to technology and the functioning of such uses. Clearly an evidence base is required; however, given the particular circumstances of this site it seems appropriate that it could be considered a priority for de-designation or re-designation for mixed use to enable other priorities within the Local Plan to be achieved.

3.2.2 Mixed Use Former industrial Employment Areas

Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas

As outlined in our response to 3.2.1, we believe that the Central Wandsworth LSIA should be either de-designated entirely or at least re-designated to a MUFIEA type allocation due to its low employment generating potential and its proximity to the town centre.

The current MUFIEA policies allow for a residential component where:

- Net employment floorspace equivalent to at least existing employment space is provided. In particular space catering for small and medium sized enterprises will be sought.
- New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment area.
- Existing surrounding uses will not have an adverse impact on the amenity of new residential space.

Whilst we agree with this approach in general, the requirement to provide net employment floorspace equivalent to at least existing employment space 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 London¹ 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.

¹ Insert ref to GLA/PBA office densities report

It is therefore considered that a more flexible approach should be sought in MUFIEAs which would allow the replacement of the equivalent number of jobs rather than the equivalent employment floorspace.

3.2.3 Offices

Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?

As outline above, 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 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.

3.2.4 Waste

It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and sites in the Employment and Industry Local Plan document.

Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities?

No comments on waste at this stage.

3.3 Spatial Approaches

The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.

Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?

No comments on spatial approaches at this stage.

3.4 Specific Policies

Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?

Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?

Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?

No comments on specific policies, other than those already discussed above in our response to 3.2.2 in relation to the replacement of employment floorspace in MUFIEAs and the re-designation of the Central Wandsworth LSIA in our response to 3.2.1.

We request that all of the comments above are considered as part of the Employment Land Review process and request the opportunity to be involved in the work of the consultants once appointed. We understand from discussions with your officers that there will be further opportunity to submit information to the consultants as part of the Employment Land Review process and request to be notified when this opportunity arises.

Yours sincerely



Hayley Ellison
Executive Director, Boyer London

Tel: 0203 268 2430

Email: hayleyellison@boyerplanning.co.uk

19 January 2016

Planning Policy Project Manager

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

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Dear Sir/Madam

WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW, PREPERATION STAGE – COMMENTS ON BEHALF OF THAMES WATER

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water in relation to their statutory undertakings.

As you will be aware, Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Our comments on behalf of Thames Water are set out below:

A key sustainability objective for the preparation of the Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: ***“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”***

Paragraph 162 of the NPPF relates to infrastructure and states: ***“Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”***

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that ***“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).***

Policy 5.14 of The London Plan, March 2015, relates to Water Quality and Wastewater Infrastructure and states: ***“LDF preparation***

E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”

Policy 5.15 of The London Plan relates to Water Use and Supplies.

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Thames Water consider that the Local Plan should include specific text covering the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).

Such a policy is required to ensure the infrastructure is provided in time to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness" for Local Plans.

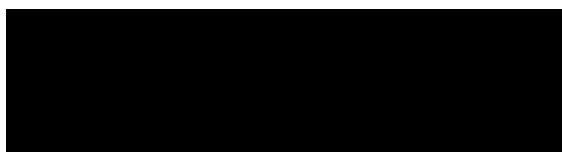
In order that the Local Plan is effective and compliant with national planning policy and guidance, Thames Water consider that text along the following lines should be added to the new Local Plan :

"The Council will seek to ensure that there is adequate surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered."

Such a policy/supporting text is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades. In some circumstances it may be necessary to apply a planning condition on the new development to ensure that the infrastructure upgrades are in place ahead of occupation of the development.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours faithfully



David Wilson BA (Hons), BTP, MRTPI
Associate Director Planning

THE TONSLEY RESIDENTS' ASSOCIATION

Incorporating Neighbourhood Watch

From: James Smith, 82 Tonsley Hill, London SW18 1BD

Martin Howell
Group Planner – Policy and Information
Town Hall
Wandsworth High Street
London SW18 2PU

27th January 2016

Dear Martin Howell,

Thank you for your letter of 10 December 2015 outlining and inviting views on the Council's proposed areas of review.

The proposed approach for a coordinated, single overarching Employment and Industry Local Plan document seems appropriate, provided this is fully mindful across all the areas that form part of the existing Local Plan - i.e. the Core Strategy, Development Management Policies Document and the Site Specific Allocations Document.

Other specific points are as follows.

- Criteria for determining which land should be released: key factors to consider are underuse/non used land, and length of time.
- Waste: it is important to ensure additional protection from neighbouring development that might prejudice waste management activities, something that needs to be picked up at the outset rather than later on or after the neighbouring development is underway.

We look forward to seeing the outcome of this consultation and the follow up full review of the Local Plan documents.

Yours sincerely,

Chairman

CB/CC/P5510
29th January 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 (Dec 2015)
Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW**

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 industrial review' consultation with particular reference to the following site:

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

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 small business units with 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 becoming outmoded and is in need of upgrading to better reflect tenant requirements and modern business needs.

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.

However, 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 little relationship to the neighbouring

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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 at some-point over the next 5-10yrs to either replace or upgrade the existing accommodation. On this basis, TRPIT 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 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.

Proposed Masterplan

To support our client's representation on the employment land review and to explain the aspirations for the site further, a high level masterplan has been 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 enhances 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.

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 residential uses 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.

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 and retail space. 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. As per Wandsworth Business Village, the prime use during the day remains employment and industrial uses however the residential accommodation ensure the area remains active throughout the evening.

Proposed Areas for Review

In addition to the specific comments made for the site, TRPIT wish to make the following representations in relation to the areas of review put forward by the Council.

Overall Approach

We support the Council's decision to produce a new Local Plan document covering employment premises and industrial land. In our opinion, the existing policies of the Core Strategy (2010) and the Development Management Policies Document (DMPD) (2012) are outdated and outmoded for today's employment arena. By upholding their commitment to review and update their policies and the evidence that supports them, the Council are taking positive steps to create an improved environment and framework for the Borough's employment sectors. This process also offers the opportunity for developers and the Council to pragmatically address opportunities to improve the current employment offering of existing sites.

Strategic Issues

Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIAs)

With regard to Policy DMI1 of the DMPD, it appears counter intuitive to afford the same blanket protection to both SILs and LSIAs when they are both different designations with different characters and uses. We would recommend that the two designations be split into two separate policies with their own levels of protections made clear. It is recommended that the SIL designation would be granted the highest level of protection from loss of industrial practices, whilst the LSIA would be granted similar protection but could be afforded similar levels of protection unless a site is no longer suitable and viable for its existing or alternative industrial use in the medium to long term.

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. Other Local Plans have introduced a clause into their LSIA/LSIS policies which would require the applicant to submit proof the property being actively marketed over a period of 18months or more along with a financial viability assessment to convey that the property is not in demand. The policy could promote employment generating uses to replace these unsuitable industrial sites whilst ensuring that the proposed use would not compromise the function of the LSIA or the operating conditions of the remaining uses or potential future use of neighbouring sites. In line

Employment and Industry Review
January 2016

Rolfe Judd
Planning

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.

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

In summary we believe that the existing policy should address the differing aims of the SIL and LSIA designations.

Mixed Use Former Industrial Employment Areas (MUFIEAs)

We generally support the objectives of Policy DMI2. The flexibility afforded by the MUFIEA designation encourages rather than restrains new development and appears to provide a fantastic opportunity to diversify employment uses on site whilst intensifying the uses that currently operate on site. The designation would suit our current vision for the area, 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.


The development of suitable business space for Small and medium-sized enterprises (SMEs) should be more given more prominence within this 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 polices such as Policy PL 6 (Meeting the needs of the local economy).

Therefore encourage the Council to continue utilising this policy in future legislation and to engage with our client in relation to the potential for our clients' site to be designated as a MUFIEA.

Our client would strongly welcome the opportunity to meet with the Council's consultants and officers to provide a guided tour of the Ferrier Street site in order to provide more information on its existing tenants and development. We also hope to open a dialogue with officers 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

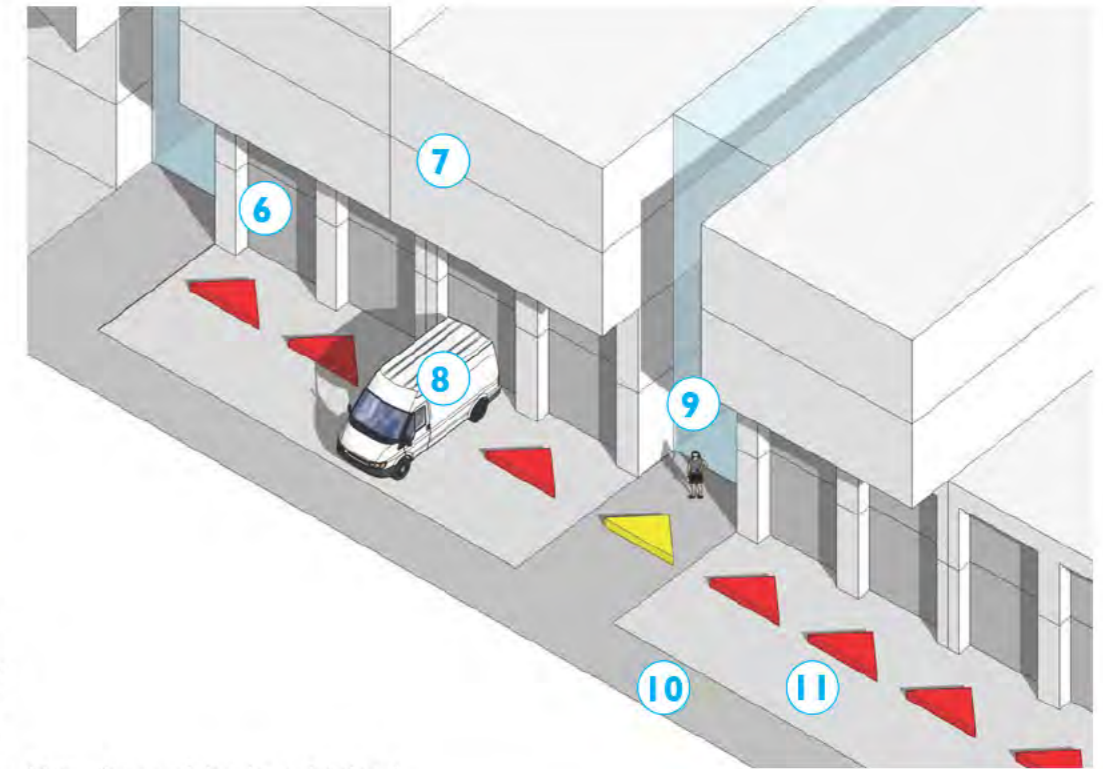
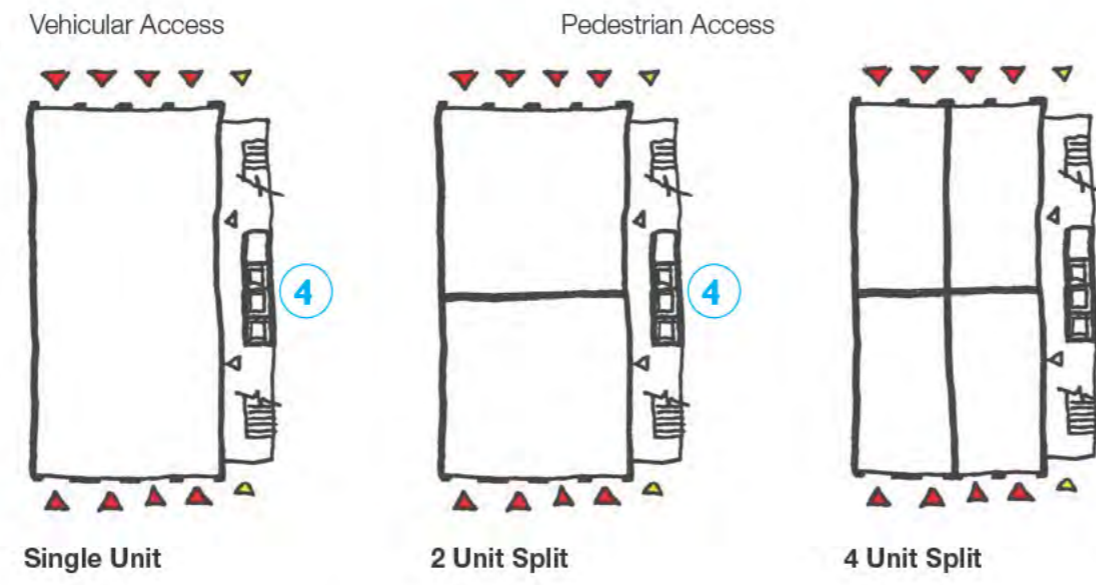
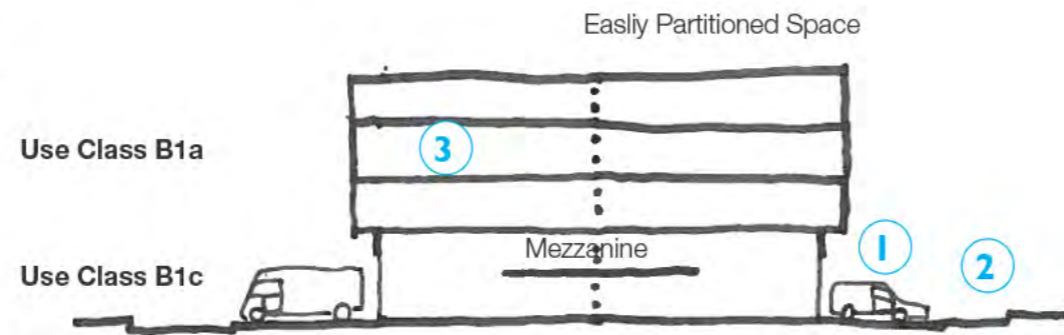
B-Class Use Typology

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.

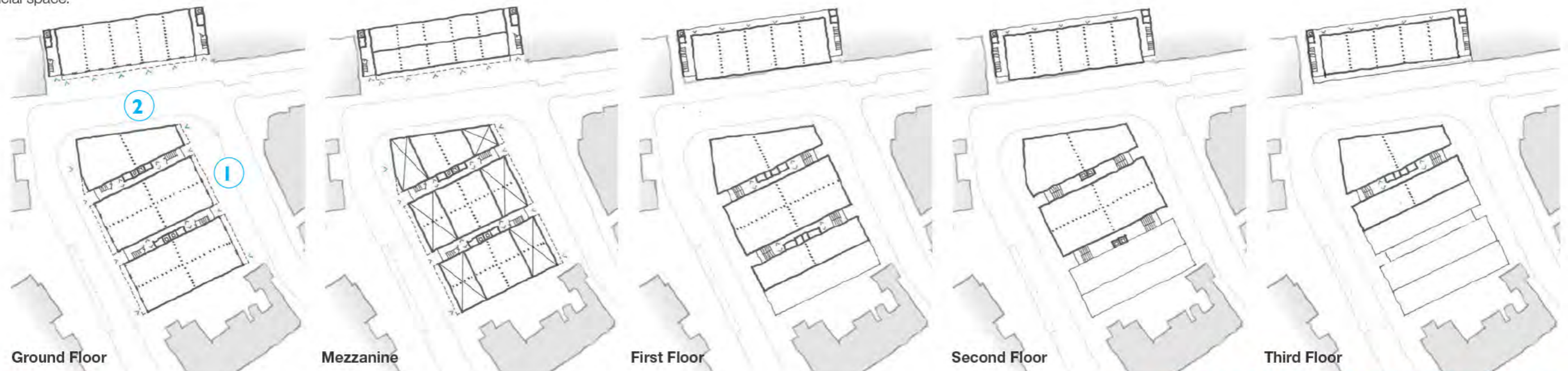
The space should be:

- 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

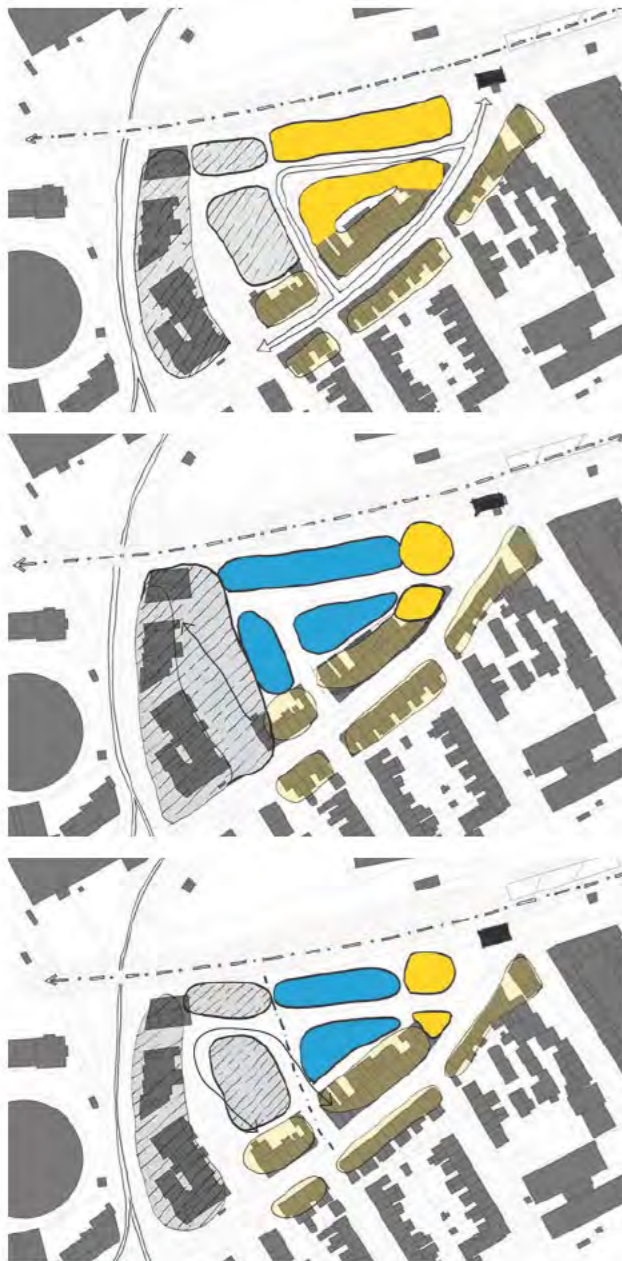


Design Proposals

Masterplan Ideas

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

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



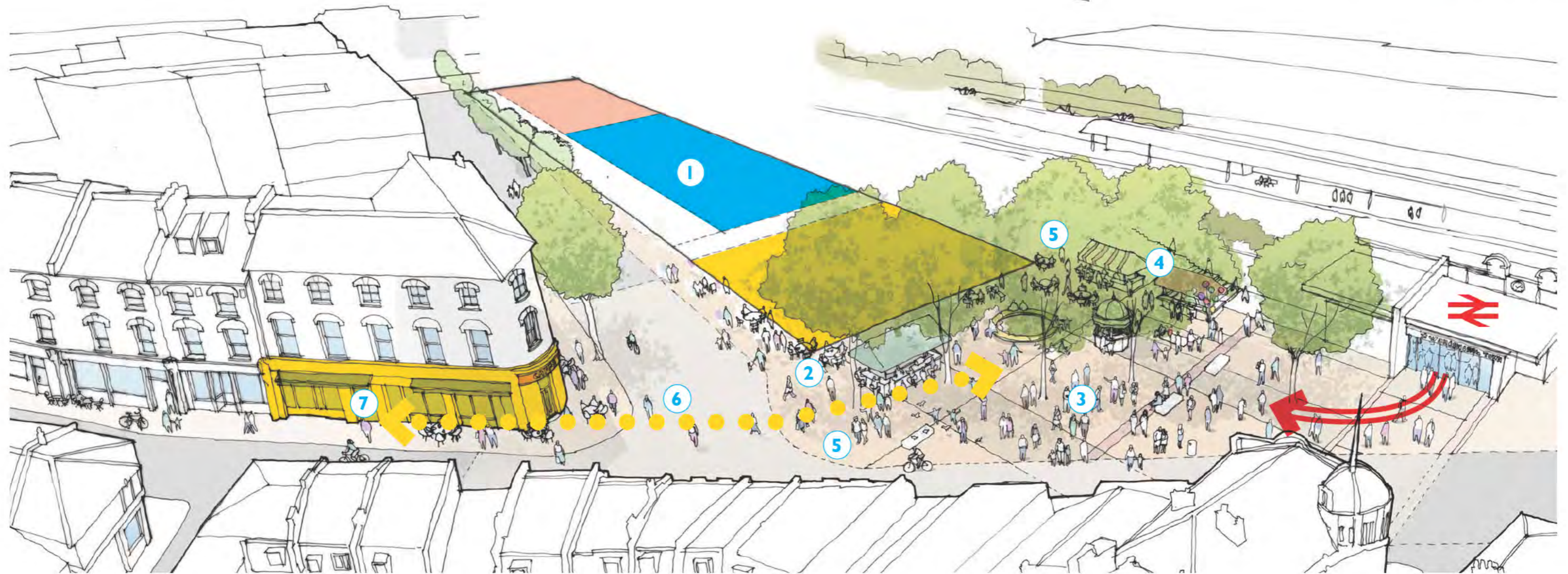
Masterplan Iterations

Ferrier Street Industrial Estate



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.

From: Steve Pinto <steve@wandsworthchamber.org>
Sent: 27 January 2016 22:41
To: PlanningPolicy
Cc: Anne Wright
Subject: Employment Land Review - Wandsworth Chamber of Commerce's Response

Dear Sir

RE: Employment Land Review - Wandsworth Chamber of Commerce's Response

Please accept this response to the Employment Land Review. Acknowledgement of receipt would be appreciated.

Wandsworth Chamber of Commerce is an independent local chamber of commerce, a not for profit limited company. We work as a network of local business people who come together to further business interests in the borough. The key aims of the chamber are to:

- * represent businesses in the London Borough of Wandsworth
- * support their interests and represent their views locally, regionally, nationally and internationally
- * promote, foster and encourage their welfare and development and to do all other things which seem to be incidental or conducive to these objects

Representing over 300 active members and with open communication channels to several thousand businesses in the borough, we would respectfully ask to be a key stakeholder consultee in the process going forward.

Employment and Industrial Land is a scarce and precious resource in Wandsworth and merits a specific policy focus. The amount and type of employment floor space (as well as land) is what determines market conditions and so the wider range of policies set out on p5 need to be considered strategically. There is a need to understand the dynamics of business creation (which will generate the demand for floor space) and much of this future demand will come from home based businesses – so increasing the number of homes is likely to increase local demand for business space. Planning designations do not always fit well with business creation and growth in today's economy so the opportunity should be taken for policies to be updated to reflect modern day needs.

Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA) – there are very few industrial areas left in Wandsworth and the presumption should be to maintain what we do have. This is particularly true for employment uses that do not mix well with residential (including where deliveries/HGV access required). Where land may not be suitable for the type of historical industrial use in the past, consideration should be given to smaller scale employment uses such as workshops, studios, etc. which can provide an opportunity to increase employment densities. LSIA land north of Wandsworth Town Centre may provide opportunities for mixed use development but should include substantial employment uses reflecting proximity to transport links and existing business activities

Mixed Use Former industrial Employment Areas – where these are in proximity to local centres and transport links, there is every reason to suggest that business/employment uses will be viable. In these areas, employment uses that mix well with residential can be appropriate and add diversity and vibrancy to an area. Mixed use has recently been taken to mean overwhelmingly residential and there should be a more balanced view, including office and employment space being provided on upper floors.

Offices – there is a need to halt further erosion of the borough's office provision. It is also important to provide office space in sufficient quantity in well located areas. Town centres are the priority given the need for businesses to access customers and staff and their connectivity will make them competitive locations

Waste – sites reserved for waste management are strategically important. There is an opportunity to integrate such sites more effectively in their surroundings through appropriate investment in business premises that are less sensitive neighbours and can help to ease the transition with nearby residential areas

Spatial Approaches – adopting a detailed spatial approach can provide policy certainty for developers and occupiers. Being clear on what uses are acceptable should enable appropriate development and will only burden those developers seeking to go against policy. Making Wandsworth attractive for innovative and far sighted developers and investors to provide a range of business premises would be a positive step.

Specific Policies – specific policies allied to a vision for growing local SMEs would be welcomed. Such policies should aim to reflect current day trends in the provision of business space which encourage a broad range of uses. New forms of space such as co-working spaces and serviced office space need to be enabled, especially as part of mixed use and town centre developments where many residents will wish to run their own business. Whilst larger industrial floor space is likely to be less viable, there is strong demand for light industrial units and workshops for many businesses who seek (and are willing to pay for) an inner London location. Many of London’s key sectors such as creative businesses, design companies, the food sector, precision engineering and advanced manufacturing create a demand for such space. A common issue is having access to high quality broadband connections and related infrastructure; specific policies can help to ensure that new investment addresses any current local gaps.

Overall – Wandsworth Chamber of commerce is pleased to be able to respond to this consultation in the early stages of developing this important policy area. Employment land and floor space is increasingly being eroded in Wandsworth reflecting the value of residential land and also policies such as Permitted Development Rights. We hear the consequences on a daily basis as members are confronted with increasing rents, difficulties in finding premises or even being faced with the threat of eviction. It is important that the voice of the business community is adequately reflected in further policy development and the Chamber is keen to work with the Council to ensure this happens. Wandsworth has always been seen as a dynamic business location but a lack of suitable land and premises threatens to leave us as a dormitory borough. New planning policies that reflect the needs of London’s dynamic 21st century economy present a real opportunity to neutralise this threat.

Yours sincerely

Steve Pinto

020 3289 7887

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Chief Executive

Wandsworth Chamber of Commerce

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www.citylocal.co.uk/wandsworth

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Wandsworth Society

02 March 2016

**49 Wandsworth Common
West Side
London SW18 2EE**

M. Howell Esq,
Group Planner Policy and Information
Planning Policy
Housing and Community Services
Wandsworth Borough Council
Town Hall
Wandsworth High Street
London SW18 2PU

Dear Mr Howell,

Re: Wandsworth Local Plan: employment and industry review.

We refer to your request for representations on your proposed Local Plan review. We have discussed this with members of the planning group and have the following comments to make:-

1. Overall, we have the strong view that the loss to date and the potential loss of commercial workspace has gone far enough and must be stemmed quickly. We are concerned that the implementation of these new policies, if delayed until 2018, will have allowed a further significant loss in the meantime. We would urge the implementation of any new policy at a very much earlier date.
2. Our concerns for a future policy are:
 - (i) We must avoid at all costs turning Wandsworth into a commuter suburb, only offering limited employment opportunities locally.
 - (ii) We must avoid reducing available commercial or industrial workspace; scarcity will force rents to unaffordable levels for local businesses. Workspace should be more evenly spread throughout the Borough, not just concentrated around Vauxhall, to allow more wide spread employment opportunities.
 - (iii) If we are to "grow the Borough's business base"(your para 1.1) every opportunity must be taken to control and encourage this growth, by maximising available development sites and workspace.

2.

3. The government's policy on Permitted Development Rights leaves little scope for the Local Planning Authority to encourage the supply of office space. The imposition of Article 4 controls may assist in this respect.

4. The amended policies must provide for:

- (i) Protecting existing employment uses vigorously (your para 3.2.1)
- (ii) Allowing mixed uses only where they would be ancillary to and complement employment uses, eg nurseries, surgeries or other local needs.
- (iii) Preserving at all costs office locations in town centres or at focal points.
- (iv) Protecting potential employment sites, which must not be released(your para 3.2.1).

5. Spatial Approaches (your para 3.3) must be maintained, to allow the Council an element of control. This means overall planning rather than a piecemeal approach. This is something the Society has advocated for many years.

6. Investment should be encouraged for all forms of industrial and employment use, thus no areas should be restricted to specific uses.

We trust that our comments will be helpful to the Council and if we can assist further please let us know.

Yours sincerely,

Philip Whyte
Leader planning group and vice chairman
Wandsworth Society

CB/CC/P6132
29th January 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 (Dec 2015)

We write on behalf of our client, Workspace Group PLC, to make representations to the London Borough of Wandsworth's Local Plan employment and industrial review with particular reference to the following sites:

- **Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS**
- **Riverside Business Centre, Haldane Place, Bendon Valley, London, SW18 4UQ**

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 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 sites (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 centres 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). We invite officers to visit The Lightbulb to see the success story first hand.

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), a vacant Mecca Bingo (D1 use) 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 current uses on site are not particular pertinent to the established role of a LSIA; the site is dominated by the Mecca Bingo building (Class D1) and its vast associated car park. The relevant industrial designations (B1c and B8 uses) only account for around 20% of the site meaning that the existing employment density on site is inefficient and far below its desired level. The buildings that are operating as industrial units 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 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.

For these reasons we are of the opinion that in order to facilitate the successful regeneration of the site, it must either be 'de-designated' from an LSIA or the emerging policies must allow greater flexibility for such sites to provide varied employment sites in cases such as this.

We therefore conclude that our clients' site would be appropriate candidates for release from its respective designation as part of a consolidation exercise in partnership with the Council. This subsequent increase in flexibility would allow for a greater scope in the redevelopment of the site. As outlined in previous paragraphs, Workspace would provide modern high quality floorspace specifically designed to cater for SMEs; thereby increasing the employment density and the overall quality of the site. The site lies at the edge of its LSIA designation boundary and would not isolate neighbouring sites or compromise the rest of the designated area.

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.

We are of the opinion that this site could either be granted a more flexible designation such as Mixed Use Former Industrial Employment Areas (MUFIEA) 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 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 site allocation would increase the flexibility of the site and contain the SIL to the areas south of the railway.

Proposed Areas for Review

In addition to the specific comments made for the sites above, the Workspace Group also wishes to make the following representations in relation to the areas of review put forward by the Council.

Overall Approach

We support the Council's decision to produce a new Local Plan document covering employment premises and industrial land. In our opinion, the existing policies of the Core Strategy (2010) and the Development Management Policies Document (DMPD) (2012) are outdated and outmoded for today's employment arena. By upholding their commitment to review and update their policies and the evidence that supports them, the Council are taking positive steps to create an improved environment and framework for the Borough's employment sectors. This process also offers the opportunity for developers and the Council to pragmatically address opportunities to improve the current employment offering of existing sites.

Strategic Issues

Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIAs)

With regard to Policy DMI1 of the DMPD, it appears counter intuitive to afford the same blanket protection to both SILs and LSIAs when they are both different designations with different characters and uses. We would recommend that the two designations be split into two separate policies with their own levels of protections made clear. It is recommended that the SIL designation would be granted the highest level of protection from loss of industrial practices, whilst the LSIA would be granted similar protection but could be afforded similar levels of protection unless a site is no longer suitable and viable for its existing or alternative industrial use in the medium to long term.

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. Other Local Plans have introduced a clause into their LSIA/LSIS policies which would require the applicant to submit proof the property being actively marketed over a period of 18 months or more along with a financial viability assessment to convey that the property is not in demand. The policy could promote employment generating uses to replace these unsuitable industrial sites whilst ensuring that the proposed use would not compromise the function of the LSIA or the operating conditions of the remaining uses or potential future use of neighbouring sites. 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.

London Plan Policy 2.17, Part B(c) of the Further Alteration to the London Plan (FALP) (2015) directly addresses SILs and dictates that development proposals in SILs should be refused unless *'the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors'*. This clear policy directive is not reflected in the Council's current legislation (DMI1) and should be accommodated. Emerging policy must also 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'*.

As addressed above we believe that our site at Havelock Terrace, Battersea should be released from the SIL. The site holds significant potential to cater for the SME market, increasing both the density

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and quality of employment space on offer. Paragraph 2.84 of the London Plan conveys the potential for a strategically co-ordinated process of consolidation, or where it addresses a need for accommodation for SMEs or new emerging industries – a factor which is not currently addressed by Wandsworth's current employment policies.

The Council must 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'. At present this is not addressed in Policy DM11 and should be As previously stated, Workspace are committed to developing high quality space for SMEs which incorporate a mix of other uses such as residential, and community facilities such as crèches and nursery's in order to provide comprehensive and supportive development which designed to benefit local businesses and residents.

In summary we believe that the existing policy should address the differing aims of the SIL and LSIA designations. The policies are too restrictive in their current form and fail to acknowledge the suitability of SME space and the potential for the collaborative regeneration of these areas as recommended in the Further Alterations to the London Plan (2015)

Mixed Use Former Industrial Employment Areas (MUFIEAs)

We support the broad aims of Policy DM12. The flexibility afforded by the MUFIEA designation encourages rather than restrains new development. Our client's model for regeneration (detailed above) thrives in such conditions as the policy encourages the incorporation of multiple uses (including commercial, employment, residential and community facilities) on site in order to generate meaningful development on sites.

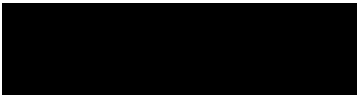
Although there is a brief reference of SMEs in paragraph 5.8 and 5.13 of the policies' explanatory text, this could perhaps be addressed more directly. In paragraph 5.13 makes reference to the demonstrated need for flexible B1 space to be utilised by SMEs. We believe that this policy would greatly beneficial in relation to our two sites above if they were to be re-designated as MUFIEAs.

We would therefore encourage the Council to continue utilising this policy in future legislation and to engage with our client in relation to the potential for both of our clients' sites to be designated as MUFIEAs. We would also encourage that the promotion of SMEs are given more prominence in this policy and other relevant polices such as Policy PL 6 (Meeting the needs of the local economy).

I can confirm that we would be more than happy to meet with you and your colleagues 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

Wandsworth Local Plan: employment and industry review (Dec 2015)

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Mr Anthony Seale				Overall Approach	3.1	<p><u>Inclusion of large scale commercial land use</u></p> <p>We need also to consider protection of larger commercial premises, such as large supermarkets (e.g. Clapham Junction ASDA and LIDL). These spaces provide hugely important services to the community but are also under threat from the disparity between commercial and residential land prices. This is particularly acute for commercial land with a larger footprint. Larger footprint stores provide particular benefits to the community in that they can cope with higher numbers of customers, provide a wider range of services, provide lower cost produce and are more family friendly. Dependence only on smaller, higher cost less family friendly supermarkets is likely to limit the area's ability to support families and those on lower incomes.</p> <p>In future, there may also be demand for larger commercial premises for other commerce uses. It would be very difficult for larger commercial premises to reopen once land is split into many residential titles. Not protecting such land uses will lead to the homogenisation of areas as residential use and, by reducing the importance of focal points, decrease community cohesion.</p> <p>The scope of this plan should therefore be extended to protect large scale commercial premises.</p>
Mr Alan Pates				Overall Approach	3.1	Yes
Mrs Helen Evans				Overall Approach	3.1	Yes
Mr Mark	Putney Society			Overall Approach	3.1	Yes. Agree with the need for an overall plan, with an overarching target to maintain employment floor space in all categories. If there is a target, then it should be monitored to ensure that it has been

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Poulter						achieved.
Cyril Richert	Clapham Junction Action Group			Overall Approach	3.1	<p><u>Consultation on new Local Plan document covering employment premises and industrial land</u></p> <p>Dear Sir,</p> <p>The Council is producing a new Local Plan document covering employment premises and industrial land. You are inviting us to make representations on the Council's proposed areas of review.</p> <p>We have spent a tremendous amount of (unpaid!) work on previous consultations.</p> <p>We have produced hundreds of pages of analysis and comments. The main ones have been recently confirmed by the inspector in charge of reviewing the local plan (which final report was even not received when you submitted your email on 10 December regarding this consultation on a new local plan!).</p> <p>However our comments are brushed aside and dismissed (when not mocked) by Wandsworth Council. The Council is only implementing some of our recommendation when forced by either the government or organisations such as TfL.</p> <p>For many years in the past we have been saying that Wandsworth Planning policies were ineffective. The Council has always denied it and went up to calling us Nimbies because we dare highlight the facts. And yes, they are not our own fantasy, but those allegations were actually confirmed by the government inspector during the Local Plan examination: " <i>the documents as a whole are ineffective</i> " he wrote at the end of July. We were right. Is the Council going to apologise?</p> <p>In the same way, we complained many times that so-called consultations were only box-ticking exercises for the Council. In December 2014 we wrote to the Council :</p> <p><i>"As usual, we noticed (and regret) that most of the comments made by the residents, groups and societies have been rejected or ignored in your responses to the 2013 consultation on planning policy; it questions, once more, the purpose of the full process, other than ticking the right box at the right</i></p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p><i>time.</i></p> <p><i>We have little hope that any more consideration will be given regarding concerns of the local residents. And we believe that the same feeling is shared by all the other Societies in Wandsworth. In itself, not addressing that issue is showing the poor consideration given by Wandsworth council to the consultation process, which is only therefore fulfilling its statutory duties.”</i></p> <p>Recent debates within the Council chamber have once again proven us correct. When the Council decided to run its own poll on its website and was eventually displeased by the result, they decided it was irrelevant regarding the entire population of the borough. Cllr Govindia, leader of Wandsworth Council, made this cynical remark :</p> <p><i>“62% of the 1,366 respondents to the Council’s survey expressed this view – not 62% of residents. That equates to 847 people. As a percentage of the Borough’s population of around 310,000, that is 0.27%”.</i></p> <p>Following Mr Govindia reasoning, only 21 representations were received regarding the examination of the Council’s planning documents. This is 0.0068% of the borough’s population. Let’s be honest. We will never reach 160,000 representations of residents (<i>including new born babies objections according to Mr Govindia’s calculation!</i>). What’s the point of consultation?</p> <p>Once again it is a very clear example of the level of consideration that Wandsworth Council is giving to consultation and democracy.</p> <p>You are proposing now some areas for review. In respect of the process of consultation, we will address your point:</p> <ol style="list-style-type: none"> 1. Overall Approach: Wrong 2. Strategic Issues: What are you protecting really? 3. Offices: Are you really focusing on town centres? Putney would be delighted to hear! 4. Specific Policies: When have you seriously tried to protect offices? Where is you Action 4 Direction? <p>During previous consultations, you have already received our comments on employment zones. You have dismissed our criticisms on your attitude to protect offices in view of recent legislation changes. Conversions from industrial sites to retail, then to residential have been the norm and you have done nothing to restrict it.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						Therefore why should we spend time on this new consultation? Especially on industrial land, when the Council failed to protect and even encouraged its disappearance? Is Wandsworth Council going to listen in 2016?
	Generator Developments LLP	Anna Snow		Overall Approach	3.1	<p>I write on behalf of Generator Developments LLP to provide representations on the 'Employment and Industry Review' which is currently being conducted by the London Borough of Wandsworth. For the purposes of clarity these representations follow the format of the consultation document, with a specific focus on the review of Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA).</p> <p>The intention of producing a single Employment and Industry Local Plan Document is supported in principle, subject to the Document being sufficiently cognisant of other core priorities for the borough, in particular housing need. Sufficient flex needs to be built into the Local Plan Document to enable a timely response to changing circumstances across the borough. Any policy change should not result in a 'one size fits all' approach.</p>
Mr Stewart Murray	Greater London Authority			Overall Approach	3.1	<p>Planning and Compulsory Purchase Act 2004 (as amended);</p> <p>Greater London Authority Acts 1999 and 2007;</p> <p>Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>Re: Wandsworth Council Local Plan: employment and industry review</p> <p>Preparation Stage</p> <p>Thank you for your correspondence of 10 December 2015 notifying the Mayor of London of Wandsworth's proposed review of its Local Plan employment and industry policies. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. In this instance the Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London, which I endorse, will be sent separately.</p>
Mr Stewart	Greater London Authority			Overall Approach	3.1	As part of the potential review of the London Plan it is likely GLA officers will be carrying out the following studies which may help augment Wandsworth's employment evidence. The technical

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Murray						<p>evidence and likely completion date are listed below:</p> <ul style="list-style-type: none"> • Industrial land supply (February 2016) • Employment projections (July 2016 - updated annually) • Industrial Demand (February 2017) • London Office Review (February 2017) <p>The Mayor will issue his formal opinion on general conformity when requested at the pre-submission stage. However, I hope that the comments provided at teh current stage will inform the development of Wandsworth's policies.</p>
Miriam Howitt				Overall Approach	3.1	<p>There is a great need for inexpensive small premises for start-up businesses. These can be within a dedicated building where a number can share facilities, or in opportunistic individual locations. For instance, as I cycle up Danebury Avenue on the Alton Estate West, I notice potential garage-sized premises beneath the two blocks of flats below the shops. Several bays already provide stores for the tenants, but it is only the landscaping between the blocks and the road that prevent more bays being opened up for this purpose. Re-designing the ramps would offer access to small workshops, offices, studios or shops (a shoemaker, IT consultant, dressmaker, accountant, domestic cleaning or child-minding agency, graphic designer, for instance) accessible to the general public.</p>
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Overall Approach	3.1	<p>Boyer are instructed by Ipsus Development Ltd to respond to your recently published consultation on the Local Plan: Employment and Industry Review (preparation stage).</p> <p>Our client has an interest in land and premises at 38-54 Lydden Road (SW18 4LR), which is currently within the Bendon Valley Locally Significant Industrial Area (LSIA).</p> <p>This consultation response letter responds to the questions posed and also identifies the specific characteristics of our clients site and the wider LSIA which mean that it would be appropriate to consider de-designation or re-designation to 'mixed use' in the upcoming Employment and Industry Local Plan Review.</p> <p>Therefore, in addition to the responses to the consultation questions this letter also includes information relating to our client's site and the wider Bendon Valley LSIA which we request is given detailed consideration as part of the Employment Land Review evidence base document, which we understand is due to commence in the spring.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>3.1 Overall Approach</p> <p>Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?</p> <p>Yes it is agreed that producing a single Employment and Industry Local Plan document is the most appropriate approach in this instance.</p> <p>The economy of London is changing rapidly and so are the space requirements of businesses. 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 who require flexible modern premises in good strategic locations.</p> <p>The planning framework has also changed considerably since the last Wandsworth Employment Land Review 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.</p> <p>The Wandsworth Employment Land Review was published in 2010 and the work to support this document will have been carried out prior to this, as such the 2010 Review will not fully reflect the changes described above and is therefore most likely out of date.</p> <p>Given that a full review of the Local Plan is likely to take some time and that these policies were not included as part of the last review, it is agreed that this is the most appropriate approach in this instance.</p> <p>We request that all of the comments above and in the attached appendix are considered as part of the Employment Land Review process and request the opportunity to be involved in the work of the consultants once appointed. We understand from discussions with your officers that there will be further opportunity to submit information to the consultants as part of the Employment Land Review process and request to be notified when this opportunity arises.</p>
Andrea	London Borough of			Overall	3.1	Thank you for consulting the Council on the proposed Employment & Industry Land Review.

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Kitzberger	Richmond			Approach		<p>As discussed in our recent Duty to Cooperate meeting on 15 January 2016, both Councils share common concerns regarding the loss of employment floorspace and industrial land. This is also one of the key drivers for Richmond's Local Plan Review to strengthen the economic focus and protect employment land, particularly in the light of significant loss of offices to residential through prior approvals across the borough.</p> <p>There are benefits that both neighbouring boroughs are taking a similar approach, and the London Borough of Richmond upon Thames supports the review by Wandsworth Council.</p> <p>The detailed approach is more appropriate for each borough to consider, however we look forward to continuing to engage as the evidence base and detailed policy approaches are prepared.</p>
Laura Kelly	National Grid	Robert Deanwood	Amec	Overall Approach	3.1	<p>Wandsworth Council: Local Plan: Employment and Industry Review</p> <p>SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>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.</p> <p>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: [details provided]</p>
Piotr	Natural England			Overall	3.1	<p>Thank you for your correspondence in respect of the Wandsworth Local Plan: employment and industry review, this is much appreciated. Having taken a look at this consultation in particular it is clear that</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Behnke				Approach		<p>Natural England would have no comments to make in relation to this particular topic area as it doesn't fall within our remit.</p> <p>I trust that this is sufficient for your purposes, and thank you again for keeping Natural England advised as to the progress of the Wandsworth Local Plan.</p>
	Office Estates Ltd	Colin Sinclair	DP9	Overall Approach	3.1	<p>WANDSWORTH EMPLOYMENT AND INDUSTRY REVIEW - PREPARATION STAGE</p> <p>SUBMISSION OF REPRESENTATION TO EMERGING EMPLOYMENT AND INDUSTRY REVIEW LOCAL PLAN</p> <p>On behalf of our client, Office Estates Limited, we wish to make the following representations to the recently published 'Wandsworth Local Plan: employment industry review - preparation stage' document.</p> <p>Representation</p> <p>We have the following comments concerning the Council's approach to the preparation of the Employment and Industry Review Local Plan document:</p> <p><u>1) Overall Approach / Reasons for the Review:</u></p> <p>We consider that the overall approach, to produce a single Employment and Industry Review Local Plan document, represents a reasonable and logical way to assess the local economic and employment needs of the Borough.</p> <p>The reasons for the review are supported: it is agreed that the Council has 'a responsibility to plan for the business need for land and premises in the area', and the forthcoming review of employment land within the Borough will provide a solid basis for the Council to review its existing employment policies within its Local Plan.</p>
	Panorama Antennas Ltd	Kevin Watson		Overall Approach	3.1	<p>Our ref: NEH/KWEW/AKG/J7696</p> <p>61-63 Frogmore, SW18 1HF and 10 Dormay Street, SW18 1EY</p> <p>Site Representation under the Employment Land Study</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>We are representing our client, Panorama Antennas Limited, in the promotion of their land at 61-63 Frogmore, London, SW18 1HF ('The Site'), for its release from solely employment land use in order to allow for mixed use development, whilst retaining a significant level of employment provision. We are aware that, as part of a new Employment Land Study, the London Borough of Wandsworth (LBW) are currently inviting representations of this nature borough-wide to identify land currently used as employment premises or industrial land which would be suitable for residential or mixed use redevelopment.</p> <p>Our client seeks to secure the release of their land under the new Employment Land Study. They wish to reconfigure their employment land through rationalising their operations, thereby allowing for space to develop residential units, creating a mixed-use site. Harrison Architects + Designers Ltd have already undertaken feasibility analysis to identify scheme options comprising both employment and housing and, in due course, we envisage holding formal pre-application discussions. In the meantime, if Policy Officers would like to meet so that we can present the initial ideas and concepts we would be pleased to do so.</p> <p>Our Position</p> <p>Gerald Eve has been instructed to engage with the policy process, and promote the site for mixed use redevelopment, releasing it from its current employment designation. Panorama Antennas Limited are underusing the land and seeking to rationalise their operations which will free up space for supplementary uses, including residential.</p> <p>Planning policy at all levels provides a positive framework for the release of surplus employment land in favour of mixed-use / residential development, as summarised below.</p> <p>National Planning Policy Position</p> <p>Paragraph 22 of the National Planning Policy Framework (NPPF, 2012) suggests that employment land allocations be regularly reviewed by local planning authorities. Where there is little prospect for employment use, applications for the alternative use of that land or buildings should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities. Also, according to NPPF Paragraph 158, local planning authorities should ensure their assessment of, and strategies for, housing and employment uses are integrated, again taking full account of relevant market signals.</p> <p>Relevant market signals at The Site suggest that releasing this employment land site for mixed-use</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>(residential and employment) development would respond to the housing-land supply requirements in LBW whilst also allowing for our client to efficiently rationalise their operations and increase the overall productivity of their land.</p> <p>Local Planning Policy Position</p> <p>Paragraph 4.42 of the Wandsworth Local Development Framework Core Strategy (2010) demonstrates LBW's proactive attitude to the identification, both of potentially suitable employment land, and also land within the borough which is no longer 'meeting contemporary needs'. This reflects NPPF Paragraph 22 which states that 'planning policies should avoid the long term protection of sites allocated for employment where there is no reasonable prospect of a site being used for that purpose.'</p> <p>Our client's redevelopment ambitions for The Site are in-keeping with this policy then, as they wish to reconfigure their employment land as a consequence of underutilisation, thereby creating space for residential accommodation. This will make the land more productive in both land use requirements and contribute towards LBW's housing delivery.</p> <p>Core Strategy Policy PL6 'Meeting the needs of the Local Economy' states that mixed use redevelopment of employment sites will be acceptable where: 'new uses are compatible with the neighbouring uses and will not harm the viability of the surrounding employment area' and 'existing surrounding uses will not have an adverse impact on the amenity of new residential space'. The Site presents an opportunity in both cases. The proposed residential element on The Site will allow for the retention of employment land use as it will be reconfigured to be more fit-for-purpose for our client's operations. Moreover, given the proliferation of residential development in the immediately surrounding area, the amenity of any residential units proposed at The Site would reflect the changing character and amenity of this area.</p> <p>Considerations Regarding the Surrounding Area</p> <p>In direct response to the recently published LBW document (December 2015), we consider that with regards to point 3.2.1 'Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)' our site should be considered for release.</p> <p>The Site is within an LSIA surrounded by large-scale residential redevelopments. We believe that this is an area of the LBW where significant opportunities for housing have been identified, demonstrated by the volume of permitted residential and mixed-use developments. These include redevelopment of the:</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<ul style="list-style-type: none"> • RAM Brewery Site in Wandsworth Town, • Shell oil terminal on the west side of the River Wandle, along the Thames, • the River Wandle, along the Thames, • Gas Holder Site. <p>In addition, LBW have previously accepted the Wentworth House site for release within the LSIA. This further demonstrates that new development, beyond solely employment use, in this area is deemed appropriate by LBW.</p> <p>Moreover, at the rear of the property (10 Dormay Street) it is considered sensitive design would improve the existing utilitarian, light industrial brick frontage. Given The Site's neighbouring location to heritage assets, redevelopment would therefore present an opportunity to enhance the character and appearance of Dormay Street, Grade II listed Wentworth House and the surrounding area.</p> <p>On this basis, The Site is located within an appropriate area where mixed-use (including both employment and residential) should be encouraged and has been deemed acceptable in the recent past by LBW.</p> <p>Concluding Remarks</p> <p>Our client's proposal of mixed-use redevelopment (residential and employment) at The Site is in keeping with national and local policy, whilst also reflecting the climate of development in the immediate surrounding area.</p> <p>This site is suitable for release from solely employment use to provide fit-for-purpose, rationalised employment space and deliver housing to assist with meeting delivery targets. We trust that these representations will be taken into account by the Council at this early consultation stage and we would be grateful to be kept informed of matters as the employment land review progresses. As mentioned at the outset, we would be pleased to meet with members of the Planning Policy team to discuss and present the initial concepts and designs for a mixed-use redevelopment at The Site.</p> <p>If you have any queries please contact Kevin Watson (0207 333 6388) or Anna Gargan (0207 518 7240) of this office.</p>
	Safestore Ltd	Adam		Overall Approach	3.1	RE: REPRESENTATIONS – WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW – PREPARATION STAGE (DEC 2015)

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
		Conchie				<p>We write in response to your consultation exercise on the Wandsworth Local Plan: Employment and Industry Review – Preparation Stage Document. We submit this response on behalf of our client ‘Safestore Ltd’ who owns three sites located within the London Borough of Wandsworth.</p> <p>Background</p> <p>Safestore Ltd owns and occupies three sites within the borough; these sites are located at Ingate Place and 19 Lombard Road in Battersea and 1 Bendon Valley on Garratt Lane.</p> <p>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).</p> <p>Employment uses are the established land use allocations for these three sites. However, like many employment sites within the borough these sites are not currently optimising their full potential to improve 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.</p> <p>Strategic Policy Position</p> <p>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.</p> <p>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.</p> <p>Format and Principle of Review</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>Overall, our client supports the principle of undertaking a borough wide employment and industry review.</p> <p>We support the proposal to carry out a partial review of these aspects of the Local Plan documents for the borough. We also welcome that the fact that the Council proposes to consider the potential for sites and areas currently allocated for industrial use to be reclassified to allow other uses to come forward within these areas through the production of Area Spatial Strategies.</p> <p>It is stated in the consultation document that the Council has a responsibility to plan for the business needs for land and premises in the area and commitment to creating an improved environment and framework to grow the borough's business base and encourage more private sector investment and we fully support and welcome this approach.</p> <p>The Review and Current Context</p> <p>As a leading storage company Safestore Ltd undertake regular reviews of their asset portfolio to determine where and how to channel investment to best optimise the potential of their sites. Our client recognises that Wandsworth is a valuable location for their business and that investment is required in all three of their sites. However greater incentive is required to encourage this investment to come forward.</p> <p>Safestore Ltd are committed to delivering investment in a manner that would enable them to continue to operate their core business within the borough of Wandsworth but that also presents opportunities to enhance the role each site can play in meeting the Council's strategic objectives.</p> <p>In considering the future of their sites, Safestore are clear that each approach needs to be developed in line with operational requirements, existing use mixes and wider economic drivers. They hope that the Employment and Industry Review and its supporting evidence are undertaken in a similar vein – developing a detailed understanding of activity within sites today and then considering how this leads to future opportunities for development and regeneration.</p> <p>We would therefore encourage the forthcoming evidence base to comprehensively assess how the floorspace within employment locations is currently being utilised, to identify current and future trends impacting employment sites and also the potential for such sites to deliver other priority uses. New policy recommendations should be based on these factors, in line with the key principles of the NPPF.</p> <p>By way of an example, whilst the Ingate Place site is currently designated as SIL, the businesses and</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>activities undertaken within it demonstrate that it is not currently operating as a typical SIL site. Although there is a large proportion of storage (B8 use class) floorspace within one building, the site also accommodates a substantial business centre that provides office (B1a use class) and workshop spaces for a range of high value professional service, technology and craft based businesses.</p> <p>There is clearly a risk that the previous designation is simply 'rolled forward' irrespective of how the site is used today and how the context has changed, including the substantial regeneration of the Nine Elms Opportunity Area immediately to the east. Not only would this contravene guidance provided by the NPPF but would also underplay the economic value of Ingate Place and undermine future economic potential.</p> <p>Approaching future site allocations based on their use rather than their designation may also allow the Council to make the case for new approaches to growth on employment sites to be adopted that better reflect local circumstances and opportunities. This could include taking a flexible approach to the delivery of mixed use development in sites that offer the most appropriate context and conditions where this allows their employment role to be enhanced. This would, in turn, not only help the Council achieve its economic aims but also address the London Plan housing targets for the borough.</p> <p>A Flexible Approach</p> <p>The NPPF states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This should also be reflected in the evidence base which the imminent employment land review seeks to produce, to ensure adequate changes to planning policy can be amended where necessary.</p> <p>A lack of flexibility would be less attractive for landowners investing in employment sites where work to improve and repair buildings are required. This could continue to result in buildings falling into an untenable state where they no longer support jobs. The overall quality of employment accommodation could decline as a result. Therefore an open minded approach to the employment land review should be undertaken to ensure that the future redevelopment of these employment sites is viable and their potential optimised to help the Council deliver the objectives of its development plan.</p> <p>Summary</p> <p>There is a clear emphasis at all levels of planning policy and governance to enable the delivery of economic development and new homes on highly accessible brownfield sites. It is therefore essential that the Employment Land Review provides a clear and succinct evidence base to support the partial</p>

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						<p>review of the employment land policies within the Local Plan documents, giving landowners and developers the confidence to invest and facilitate high quality development in these locations. To do so we believe it is critical that the evidence base is developed in 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.</p> <p>We are keen to positively engage with the Council during employment land review, contributing to the forthcoming Local Plan review. Safestore Ltd as a significant landowner of employment land in the Borough is keen to engage with the Council and take part in all necessary discussion to assist with the review. We would welcome the opportunity to meet to discuss our client's sites and look forward to working with the London Borough of Wandsworth and its appointed consultants in this regard.</p> <p>If you have any queries or require any further information please do not hesitate to contact Adam Conchie (020 7911 2659) or Iain Buzza (020 7911 2054) at these offices.</p>
	St William Homes	Hayley Ellison	Boyer Planning Ltd	Overall Approach	3.1	<p>Re: Wandsworth Local Plan: Employment and Industry Review (preparation stage)</p> <p>Boyer are instructed by St William Homes to respond to your recently published consultation on the Local Plan: Employment and Industry Review (preparation stage).</p> <p>Our client has an interest in land and premises within the Central Wandsworth Locally Significant Industrial Area (LSIA).</p> <p>This consultation response letter responds to the questions posed and also identifies the specific characteristics of our clients site and the wider LSIA which mean that it would be appropriate to consider de-designation or re-designation to 'mixed use' in the upcoming Employment and Industry Local Plan Review.</p> <p>3.1 Overall Approach</p> <p>Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?</p> <p>Yes, it is agreed that producing a single Employment and Industry Local Plan document is the most appropriate approach in this instance.</p> <p>The economy of London is changing rapidly and so are the space requirements of businesses. There is a</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>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.</p> <p>The planning framework has also changed considerably since the last Wandsworth Employment Land Review 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.</p> <p>The Wandsworth Employment Land Review was published in 2010 and the work to support this document will have been carried out prior to this, as such the 2010 Review will not fully reflect the changes described above and is therefore most likely out of date.</p> <p>Given that a full review of the Local Plan is likely to take some time and that these policies were not included as part of the last review, it is agreed that this is the most appropriate approach in this instance.</p>
Mr James Smith	Tonsley Residents' Association			Overall Approach	3.1	<p>Thank you for your letter of 10 December 2015 outlining and inviting views on the Council's proposed areas of review.</p> <p>The proposed approach for a coordinated, single overarching Employment and Industry Local Plan document seems appropriate, provided this is fully mindful across all the areas that form part of the existing Local Plan - i.e. the Core Strategy, Development Management Policies Document and the Site Specific Allocations Document.</p> <p>Other specific points are as follows.</p> <ul style="list-style-type: none"> • Criteria for determining which land should be released: key factors to consider are underuse/non used land, and length of time. • Waste: it is important to ensure additional protection from neighbouring development that might prejudice waste management activities, something that needs to be picked up at the outset rather than later on or after the neighbouring development is underway. <p>We look forward to seeing the outcome of this consultation and the follow up full review of the Local Plan documents.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Unknown	TR Property Investment Trust PLC	Mr Chris Brown		Overall Approach	3.1	<p>London Borough of Wandsworth Local Plan - Employment and Industry Review (Dec 2015)</p> <p>Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW</p> <p>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 industrial review’ consultation with particular reference to the following site:</p> <p>Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW</p> <p>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 small business units with 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 becoming outmoded and is in need of upgrading to better reflect tenant requirements and modern business needs.</p> <p>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. However, 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;</p> <ul style="list-style-type: none"> • 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. <p>As a result, the existing buildings (and the land-use itself) have little 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.</p>

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						<p>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.</p> <p>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 at some-point over the next 5-10yrs to either replace or upgrade the existing accommodation. On this basis, TRPIT 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.</p> <p>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 support the provision of employment space, but also to achieve a better relationship with the surrounding land uses (particularly Old York Road).</p> <p>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.</p> <p>Proposed Masterplan</p> <p>To support our client’s representation on the employment land review and to explain the aspirations for the site further, a high level masterplan has been prepared by AHMM Architects (copy enclosed).</p> <p>The masterplan sets out the existing site constraints (which include site access, transport, aged accommodation and physical barriers) and site opportunities (which include enhances 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</p>

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						<p>their needs are met.</p> <p>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 residential uses to support the continued employment space.</p> <p>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.</p> <p>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 and retail space. 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).</p> <p>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. As per Wandsworth Business Village, the prime use during the day remains employment and industrial uses however the residential accommodation ensure the area remains active throughout the evening.</p> <p>Proposed Areas for Review</p> <p>In addition to the specific comments made for the site, TRPIT wish to make the following representations in relation to the areas of review put forward by the Council.</p> <p>Overall Approach</p> <p>We support the Council's decision to produce a new Local Plan document covering employment premises and industrial land. In our opinion, the existing policies of the Core Strategy (2010) and the Development Management Policies Document (DMPD) (2012) are outdated and outmoded for today's employment arena. By upholding their commitment to review and update their policies and the</p>

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						evidence that supports them, the Council are taking positive steps to create an improved environment and framework for the Borough's employment sectors. This process also offers the opportunity for developers and the Council to pragmatically address opportunities to improve the current employment offering of existing sites.
Steve Pinto	Wandsworth Chamber of Commerce			Overall Approach	3.1	<p>RE: Employment Land Review - Wandsworth Chamber of Commerce's Response</p> <p>Please accept this response to the Employment Land Review. Acknowledgement of receipt would be appreciated.</p> <p>Wandsworth Chamber of Commerce is an independent local chamber of commerce, a not for profit limited company. We work as a network of local business people who come together to further business interests in the borough. The key aims of the chamber are to:</p> <ul style="list-style-type: none"> • represent businesses in the London Borough of Wandsworth • support their interests and represent their views locally, regionally, nationally and internationally • promote, foster and encourage their welfare and development and to do all other things which seem to be incidental or conducive to these objectives <p>Representing over 300 active members and with open communication channels to several thousand businesses in the borough, we would respectfully ask to be a key stakeholder consultee in the process going forward.</p> <p>Employment and Industrial Land is a scarce and precious resource in Wandsworth and merits a specific policy focus. The amount and type of employment floor space (as well as land) is what determines market conditions and so the wider range of policies set out on p5 need to be considered strategically. There is a need to understand the dynamics of business creation (which will generate the demand for floor space) and much of this future demand will come from home based businesses – so increasing the number of homes is likely to increase local demand for business space. Planning designations do not always fit well with business creation and growth in today's economy so the opportunity should be taken for policies to be updated to reflect modern day needs.</p> <p>Overall – Wandsworth Chamber of commerce is pleased to be able to respond to this consultation in the early stages of developing this important policy area. Employment land and floor space is increasingly being eroded in Wandsworth reflecting the value of residential land and also policies such as Permitted Development Rights. We hear the consequences on a daily basis as members are</p>

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						<p>confronted with increasing rents, difficulties in finding premises or event being faced with the threat of eviction. It is important that the voice of the business community is adequately reflected in further policy development and the Chamber is keen to work with the Council to ensure this happens. Wandsworth has always been seen as a dynamic business location but a lack of suitable land and premises threatens to leave us as a dormitory borough. New planning policies that reflect the needs of London's dynamic 21st century economy present a real opportunity to neutralise this threat.</p>
Philip Whyte	Wandsworth Society			Overall Approach	3.1	<p>Re: Wandsworth Local Plan: employment and industry review.</p> <p>We refer to your request for representations on your proposed Local Plan review. We have discussed this with members of the planning group and have the following comments to make:-</p> <ol style="list-style-type: none"> 1. Overall, we have the strong view that the loss to date and the potential loss of commercial workspace has gone far enough and must be stemmed quickly. We are concerned that the implementation of these new policies, if delayed until 2018, will have allowed a further significant loss in the meantime. We would urge the implementation of any new policy at a very much earlier date. 2. Our concerns for a future policy are: <ol style="list-style-type: none"> (i) We must avoid at all costs turning Wandsworth into a commuter suburb, only offering limited employment opportunities locally. (ii) We must avoid reducing available commercial or industrial workspace; scarcity will force rents to unaffordable levels for local businesses. Workspace should be more evenly spread throughout the Borough, not just concentrated around Vauxhall, to allow more wide spread employment opportunities. (iii) If we are to "grow the Borough's business base"(your para 1.1) every opportunity must be taken to control and encourage this growth, by maximising available development sites and workspace. 3. The government's policy on Permitted Development Rights leaves little scope for the Local Planning Authority to encourage the supply of office space. The imposition of Article 4 controls may assist in this respect. 4. The amended policies must provide for:

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						<p>(i) Protecting existing employment uses vigorously (your para 3.2.1)</p> <p>(ii) Allowing mixed uses only where they would be ancillary to and complement employment uses, eg nurseries, surgeries or other local needs.</p> <p>(iii) Preserving at all costs office locations in town centres or at focal points.</p> <p>(iv) Protecting potential employment sites, which must not be released (your para 3.2.1).</p> <p>5. Spatial Approaches (your para 3.3) must be maintained, to allow the Council an element of control. This means overall planning rather than a piecemeal approach. This is something the Society has advocated for many years.</p> <p>6. Investment should be encouraged for all forms of industrial and employment use, thus no areas should be restricted to specific uses.</p> <p>We trust that our comments will be helpful to the Council and if we can assist further please let us know.</p>
	Workspace Group PLC	Mr Chris Brown		Overall Approach	3.1	<p>London Borough of Wandsworth Local Plan: Employment and Industry Review (Dec 2015)</p> <p>We write on behalf of our client, Workspace Group PLC, to make representations to the London Borough of Wandsworth's Local Plan employment and industrial review with particular reference to the following sites:</p> <p>- Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS</p> <p>- Riverside Business Centre, Haldane Place, Bendon Valley, London, SW18 4UQ</p> <p>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.</p> <p>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</p>

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						<p>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).</p> <p>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.</p> <p>We would therefore welcome the opportunity to meet with the Council (and the appointed Consultants) to share information on the Workspace sites (identified above) and tenant base.</p> <p>Background to Workspace</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • The typical market sectors of businesses choosing to locate at Workspace centres 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;

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						<ul style="list-style-type: none"> • 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; <p>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.</p> <p>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 highvalue 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.</p> <p>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.</p> <p>Workspace – Model for Business Regeneration</p> <p>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</p>

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						<p>which enhance the business community.</p> <p>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:</p> <p><u>Increased Flexibility and Adaptation of Existing Business and Employment Sites:</u></p> <p>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.</p> <p>Hence, Workspace Group's is focused on providing new floor space which is specifically designed to promote, support and accommodate SMEs, incorporating the following:</p> <ul style="list-style-type: none"> • 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,

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>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.</p> <p>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.</p> <p>Regeneration/redevelopment of Sites with Supporting Uses</p> <p>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).</p> <p>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.</p> <p>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). We invite officers to visit The Lightbulb to see the success story first hand.</p> <p>Riverside Business Centre, Haldane Place, Bendon Valley, London, SW18 4UQ</p> <p>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), a vacant Mecca Bingo (D1 use) 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</p>

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						<p>industrial units which make up the remaining LSIA designation and to the west is the River Wandle and King George's Park.</p> <p>The current uses on site are not particular pertinent to the established role of a LSIA; the site is dominated by the Mecca Bingo building (Class D1) and its vast associated car park. The relevant industrial designations (B1c and B8 uses) only account for around 20% of the site meaning that the existing employment density on site is inefficient and far below its desired level. The buildings that are operating as industrial units 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.</p> <p>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.</p> <p>As a consequence, Workspace Group PLC believe that there is significant scope 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. 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.</p> <p>For these reasons we are of the opinion that in order to facilitate the successful regeneration of the site, it must either be 'de-designated' from an LSIA or the emerging policies must allow greater flexibility for such sites to provide varied employment sites in cases such as this.</p> <p>We therefore conclude that our clients' site would be appropriate candidates for release from its respective designation as part of a consolidation exercise in partnership with the Council. This subsequent increase in flexibility would allow for a greater scope in the redevelopment of the site. As outlined in previous paragraphs, Workspace would provide modern high quality floorspace specifically designed to cater for SMEs; thereby increasing the employment density and the overall quality of the site. The site lies at the edge of its LSIA designation boundary and would not isolate neighbouring sites or compromise the rest of the designated area.</p> <p>Hewlett House & Avro House, Havelock Terrace, Battersea, London, SW8 4AS</p>

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						<p>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.</p> <p>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.</p> <p>We are of the opinion that this site could either be granted a more flexible designation such as Mixed Use Former Industrial Employment Areas (MUFIEA) 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 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 site allocation would increase the flexibility of the site and contain the SIL to the areas south of the railway.</p> <p><u>Proposed Areas for Review</u></p> <p>In addition to the specific comments made for the sites above, the Workspace Group also wishes to make the following representations in relation to the areas of review put forward by the Council.</p> <p>Overall Approach</p> <p>We support the Council's decision to produce a new Local Plan document covering employment premises and industrial land. In our opinion, the existing policies of the Core Strategy (2010) and the</p>

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						Development Management Policies Document (DMPD) (2012) are outdated and outmoded for today's employment arena. By upholding their commitment to review and update their policies and the evidence that supports them, the Council are taking positive steps to create an improved environment and framework for the Borough's employment sectors. This process also offers the opportunity for developers and the Council to pragmatically address opportunities to improve the current employment offering of existing sites.
	38 Havelock Terrace Ltd	Mandip Sahota	Nicholas Taylor and Associates	Overall Approach	3.1	<p>LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW</p> <p>38 HAVELOCK TERRACE, LONDON SW8 4AL</p> <p>We note that the Council is reviewing the policies in the Local Plan that relate to employment land, including areas, sites and buildings that are used as offices, factories, warehouses and workshops, as well as related activities like waste processing.</p> <p>The consultation document produced by the Council acknowledges that in recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development, due to the high demand for housing and the difference in land values between these uses. As well as providing the housing that the Borough needs, the Council also needs to ensure that the future requirements for industrial sites and employment uses are met.</p> <p>Thus, your current review seeks to ensure that the Council's approach is up-to-date and based on the latest evidence.</p> <p>Our interest lies with No.38 Havelock Terrace. The site comprises a single storey workshop/garage building and associated area of open yard, set behind a tall, circa 3m high brick boundary wall (images attached).</p> <p>The site is currently in Use Class B1(c). The site is located on the corner where Havelock Terrace meets Pagden Street. The site backs onto the Gladstone Court Business Centre and railway viaduct. The site falls within, but on the edge of, a Strategic Industrial Location (SIL).</p> <p>The immediate surrounding area is characterised by other commercial uses. On the opposite side of Havelock Terrace is a 2 storey warehouse/car workshop building, and abutting the site to the south east is another similar single storey structure. Across from Pagden Street to the north lies a 2 storey workshop building, and adjacent to this is the 3 storey Avro House. The general area comprises a mix of storage, distribution and workshop uses, with ancillary office space. To the immediate south is the</p>

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						<p>recently converted Henley office building (use class B1a), for which consent has been granted for an additional floor. This site also sits within the SIL/PIL.</p> <p>As referred to above, the site and its immediate context are allocated in the London Plan (2015) and the Council's Core Strategy as part of the Strategic Industrial Location (SIL) and is defined more precisely within the London Plan as a Preferred Industrial Location (PIL).</p> <p>The Mayor's Plan states that areas designated within the SIL "are London's main reservoir of industrial land", and paragraph 2.79 of the Plan states that, Preferred Industrial Locations are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities.</p> <p>Policy 2.17 of the London Plan states that where appropriate the SIL should be protected. Development proposals in SILs should be refused unless they fall within the broad industrial type of activities outlined above (and in paragraph 2.79 of the LP).</p> <p>Supported by the LP, Wandsworth DMPD, Policy DMI1 (SILs) currently states that within SILs the loss of existing B1(c), B2, and B8 floorspace will be resisted and proposals for B1(a) and B1(b) uses in SILs will only be permitted where it is ancillary to the principal use on site.</p> <p>Since the DMPD was introduced, the planning policy landscape has fundamentally changed. We believe that the current DMPD policy is out of date, particularly in respect of the policy's reference to B1(a) accommodation and the interaction with SILs/PILs. We believe the appropriate uses within SILs/PILs should be widened to include B1(a) and B1(b) uses. We set out our reasoning below:</p> <p>The Council's Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIA), the Wandsworth Employment and Industry Review asks at 3.2.1,</p> <p>- Should we continue to protect these areas for industrial uses?</p> <p>- Should we allow mixed use development or other uses in any of these areas?</p> <p>- What other uses do you think are appropriate in these areas?</p> <p>The old Wandsworth UDP policies used to refer to all B1 use classes, including B1(a) offices, as being acceptable in these industrial areas. As a result, at that time it is advised by Wandsworth officers that the Borough lost large amounts of its industrial employment land to the redevelopment taking place in</p>

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						<p>the Vauxhall Nine Elms and Battersea Opportunity Areas (VNEB OA).</p> <p>The Council has since sought to better protect its industrial stock and to strengthen related policies. The resulting DMPD (policy DMI1), which superseded the UDP, removed all references to B1(a) and B1(b) uses and only reference to B1(c) uses as being acceptable was retained. The UDP was superseded by the Core Strategy in October 2010, and the DMPD in February 2012.</p> <p>Since 2012, significant policy changes have come into affect which threaten employment land, particularly office accommodation.</p> <p>Most notably, Schedule 2, Part 3, Class O of the General Permitted Development Order, allowed for a temporary period, permitted development rights in respect of a change of use of premises from B1(a) office use to C3 residential. This was subject to Prior Approval being sought in respect of flooding, contamination, highways, and transport issues. The only exception to this provision in Wandsworth was the allocated Nine Elms area. All other parts of the Borough have been affected.</p> <p>In a statement issued just earlier this week, regulations laid before Parliament last week confirmed that the above rights which were introduced on a temporary basis will now be made permanent. The regulations remove the exemption of certain areas (including Nine Elms) from the permitted development right, with effect from 31 May 2019. Accordingly, unless an Article 4 Direction is brought in and accepted, potentially the entire borough of Wandsworth will be subject to this permitted development provision. It is understood that a new three year temporary permitted development right for the change of use from light industrial (such as 38 Havelock Terrace) to housing will also be created, up to a maximum floorspace of 500m2.</p> <p>The significant impact of the 'office to resi' permitted development right is well documented.</p> <p>According to the Wandsworth Council's 'Non-Residential Development Report Position Statement' (at 31st March 2014), it confirms that in the year 2013/14, there were losses of approximately 22,235m2 of B1a floorspace by way of prior approval/certificate of lawful use, with further potential loss of 3,998m2.</p> <p>'Office to Residential Conversion – establishing the impacts of the prior approval regime' (September 2015), a report produced by CBRE (based on DCLG data and in conjunction with the British Council for Offices), confirms that in the period between April and December 2014, Wandsworth Council received 65 notifications for change of use. 31% were passed without prior approval being required (the highest of any London Borough in that period). 57% were granted. Only 12% were refused.</p>

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						<p>The same report suggests potential losses of up to 355,215m2 of office floorspace within the borough if all PD schemes approved in that time were implemented.</p> <p>The Impact of Permitted Development Rights for Office to Residential Conversions, a London Councils briefing (August 2015), confirms that Greater London has been particularly affected by the introduction of permitted development rights. The impact of the permitted development rights on London's economy has been multifaceted. Some of the key consequences include:</p> <ul style="list-style-type: none"> • Loss of key office accommodation: figures submitted by London boroughs indicate that approval has been granted for at least 100,000 sq m of wholly occupied office floorspace between May 2013 and April 2015, and 834,000 sq m total office floorspace. • Loss of occupied space: the existing permitted development rights make no distinction between occupied and vacant office accommodation, and allow for no consideration of the impact of the loss of key office space. • Increase in office rents: some boroughs have reported that permitted development rights have had an impact on land values for scarce office stock, threatening the viability of office redevelopment and refurbishment even in areas where there is clear demand. • Reducing viability of local office markets: a critical mass of office accommodation is being lost, reducing the viability of economic centres. <p>The following information is based on data supplied to the Greater London Authority by the London boroughs up to May 2015. It is not a comprehensive record of conversions undertaken by permitted development rights, but gives a clear picture of the amount of office accommodation in London which has been approved for conversion under the rules.</p> <ul style="list-style-type: none"> • At least 2,639 office to residential prior approval applications have been received by London boroughs between May 2013 and April 2015. • Approval has been granted for at least 16,600 new dwellings through office-to residential permitted development rights since May 2013. • Prior approval has been granted for at least 322 fully occupied office spaces across London – around 39 per cent of those approvals granted for which occupancy information is available. • Office floor space information is available for 1,232 prior approvals. The floor space lost through these schemes totals 834,000 sq m, or around 675 sq m per scheme. Office markets across the UK, but particularly in London, are under pressure arising from demand growth (employment growth) – this is driving take-up upwards, which is in turn reducing availability. <p>Development activity to keep up with this demand is increasing, but the balance remains in favour of</p>

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						<p>landlords, with availability falling for most types of space. Office vacancy rates are therefore low, and falling. As a result, office rents have now reached record levels in central London and the ripple effect is being felt far beyond the Central core. The imbalance of supply and demand in the office stock will be exacerbated by the long-term increase in office-to-residential conversions.</p> <p>In light of the above, we consider that SILs/PILs may present local authorities with the best opportunity to protect employment sites, by becoming exemption sites (by way of Article 4), and including offices if made an acceptable use in such areas.</p> <p>These locations are characteristic of employment uses and much less attractive to residential uses. The buildings are not usually easily adapted for conversion to residential use. Moreover, it would be anticipated that these PILs/SILs would be the most obvious parts of the Borough to seek a successful Article 4, thereby assisting the local authority in controlling their losses to alternative uses.</p> <p>Moreover, whilst the extended rights will largely be subject to the same considerations for prior approval as the existing temporary rights, there is the addition of a noise assessment test for qualifying proposals. This is designed to allow local planning authorities to consider mitigation to counter noise from surrounding commercial uses. This may further assist in the control of sites in PILS and SILs which will predominantly be B2 and B8 uses, not usually compatible with residential uses do due to the nature of their activities.</p> <p>For the above reasons, we consider that the Council should continue to protect these areas for industrial uses, however, we would encourage officers to return to the provisions of the former Wandsworth UDP to would allow a greater mix of employment uses, including B1(a) and B1(b) uses.</p> <p>We trust the above is of assistance. Should you have any questions or require any further information in the meantime, please do not hesitate to contact us.</p>
Mr Alan Pates				Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>I think it is very important to protect land used for employment from residential development. Employment land within the Borough is being gobbled up by housing developers. It is very important to maintain employment to provide a mixed economy. Local employment is vital to keep local shops and services in business and also to reduce the need to commute longer distances for work. Once the local employment goes and the shops and services with it the character of areas is changed for ever. We need to keep the daytime activity on the streets of the Borough to keep it vibrant.</p>

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Mrs Helen Evans				Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	There needs to be a balance between the use of land to provide housing and the loss of industrial land that provides jobs. The increase of permitted development right applications to convert office space into residential can reduce local jobs and increase commercial rents to the detriment of small businesses.
	Callington estates Ltd	Mr Roger Birtles		Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	Any review of employment land and premises within the Borough and therein the protection to be afforded to such sites should logically review the role, function and detailed boundaries of the defined SILs and LSIA's to ensure those boundaries remain up-to-date and relevant. Land and premises should only be allocated within such designations where they form part of a unified, homogenous area having particular regard to adjacent land uses, access and servicing. Where sites are at the edge or fringe of currently designated employment areas and do not relate well to them, for example, when regard is had to adjacent land uses, the potential for those sites to be removed from the designated area should be considered. The contribution such sites could make to delivering other uses, and notably housing, should be assessed. In summary the Council should take the opportunity of this employment land review to give careful consideration to the precise boundaries of the defined SILs and LSIA's and use the opportunity to revise those boundaries where appropriate. A review of all SIL and LSIA boundaries and the appropriateness of retaining land and sites within them should be the preferred approach to the release of SIL and LSIA sites rather than seeking to identify individual SILs or LSIA's to be released. This suggested approach would mean that only sites that truly warrant such designation will be allocated and, in addition, may lead to a more dispersed release of former employment land to other uses across the whole Borough, which is to be preferred.
Mr Mark Poulter	Putney Society			Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	Employment levels are clearly falling. 100% replacement of B Class floor space should be required. The gasholder contains very little employment, so is likely to get listed as 'brownfield' under the H & P Act before this policy review gets finished. No others unless they are on roads unsuited to HGVs
Mr	Putney Society			Strategic Industrial	3.2.1	Yes. Employment levels are clearly falling. 100% replacement of B Class floor space should be required. The gasholder contains very little employment, so is likely to get listed as 'brownfield' under the H & P

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Mark Poulter				Location (SIL) and Locally Significant Industrial Areas (LSIA)		Act before this policy review gets finished. No others unless they are on roads unsuited to HGVs.
Chris Brodie				Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>My comments apply to the overall approach and hence are in one email rather than section by section.</p> <p>The review should be carried out as part of a holistic approach, considering how existing protected employment land functions in a much wider context. In particular, thought should be given to movement through such areas, their environmental quality and how they are connected to their surroundings.</p> <p>The review should not be seen as a release of employment land, rather a means of providing upgraded floorspace for a variety of employment generating uses with greater job densities.</p> <p>Any residential use at appropriate density should be seen as a means of delivering new forms of employment and other wider environmental benefits.</p> <p>Assessments should also be carried out of built form, both visually and in terms of potential life span, noting that many SMEs function in clusters of cheap accommodation. Retention, refurbishment and extension should therefore be a starting point in a study. Strategies should be put in place to avoid displacement of valued local businesses.</p> <p>Employment uses should be viewed in very broad way, including other non-residential uses such as education, health care and sports facilities that can contribute to social infrastructure and placemaking.</p> <p>If the review leads to a change in the designation of protected employment land, discussions leading to the submission of planning applications should be accompanied by masterplans explaining improvements to permeability and connections to a wider area. Ideally, non-residential use should not be speculative, with floorspace designed to suit identified occupiers, yet in a way that is adaptable. Fit out costs should be factored into viability reports and applications should be accompanied by delivery strategies.</p> <p>The Employment and Industry Review should test the resilience of the Summerstown SIL and reimagine its form and extent, taking account of the likely development of a new stadium for AFC Wimbledon and</p>

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						the short term use of Weir Road for construction during Crossrail 2. A study should look and pedestrian and cycle movement through the area, an environmental upgrade and access to and across the R Wandle.
	Generator Developments LLP	Anna Snow		Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Paragraph 22 of the National Planning Policy Framework states that planning policies should avoid the long term protection of a site being allocated for employment where there is no reasonable prospect of it being used for that purposes – where this is the case, planning applications for alternative uses should be treated on their merits having regards to market signals and the relative need for different uses to support sustainable local communities.</p> <p>Accordingly a balance must to be struck between appropriate safeguarding for heavier industrial uses (usually located within the SILS), and the encouragement of modern, flexible floorspace which is compatible with neighbouring residential uses (usually located within the LSIA). Such an approach can help meet other objectives of the Local Plan - in particular the provision of much needed housing and affordable housing - whilst also fulfilling the needs of local business communities.</p> <p>Recognition of the role that SILs and LSIA play towards employment generation should remain, however emerging policy should seek to build-in appropriate flexibility to ensure the provision of a mix of uses, as appropriate.</p> <p>Bendon Valley Locally Significant Industrial Area</p> <p>In the context of the Employment and Industry Review it is considered that the Bendon Valley Locally Significant Industrial Area (BVLSIA) should be prioritised for release for appropriate mixed use development.</p> <p>The BVLSIA is occupied by a series of low rise, low density office and light industrial units which are located within close proximity to existing residential development. Whilst it is acknowledged that parts of the BVLSIA benefit from on-going occupation for business purposes it is considered that the nature of the LSIA and the interaction with surrounding land uses make it wholly appropriate for release to secure mixed use development without compromising the range and quality of employment land available in the borough.</p> <p>Of particular note is the area to the north of Lydden Road which abuts a terrace of residential properties to the north. This site is currently occupied by a large flat roofed building divided into nine mixed use (office and light industrial) units fronting onto Lydden Road. Covered parking bays and a flat roof garage block are located along the northern boundary. The office and industrial units, whilst</p>

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						<p>occupied, are land hungry in their layout and the buildings themselves no longer provide fit-for-purpose employment floorspace. Consequently the site has low employee density, meaning the area is underperforming in terms of direct employment generation. This is a lost opportunity in the context of the area's good transport links, with both Earlsfield mainline station and Southfields tube station within walking distance.</p> <p>The release of this land from the LSIA designation would enable the provision of modern, flexible employment floorspace as part of a mixed use development, supporting the needs of the local business community whilst contributing to housing supply within this area of the borough. It would also represent the better utilisation of a sustainable, brownfield area as supported by the NPPF. For this reason we consider the BVLSIA, and more specifically the area to the north of Lydden Road, should be released for mixed use development.</p> <p>I trust the enclosed is sufficient for your current purposes and I look forward to receiving confirmation of receipt. In the meantime please do not hesitate to call me if you wish to discuss any point in more detail.</p>
Mr Stewart Murray	Greater London Authority			Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Strategic Industrial Location and Locally Significant Industrial Areas</p> <p>The Mayor welcomes the active management of industrial land and premises to ensure there is sufficient stock to meet the future needs of different types of industrial and related uses in different parts of London, in line with London Plan policies 2.17 and 4.4 and the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). Wandsworth should ensure that any land to be released is surplus to local and strategic industrial need and that its release will be managed in ways which maintain economic performance of the wider industrial area.</p> <p>Wandsworth's Employment Land Study should inform the quantum of industrial land that is required and identify the most appropriate locations and site characteristics needed for a variety of industrial uses. London Plan policy 4.4B sets out some of the matters that should be identified to inform a revised local policy on employment/industrial demand and supply. The study should consider the strategic role that industrial sites in Wandsworth play, including in supporting the strategic functions of the Central Activity Zone.</p> <p>If required, Wandsworth should investigate the potential to re-invigorate existing industrial areas before they are considered for loss to alternative uses. However, where the loss of land in industrial uses can be justified, the Borough could look at potential mixed use schemes for residential and emerging employment sectors that require specific design features but may also be more compatible</p>

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						<p>with residential use than traditional industrial uses. In line with London Plan 4.4, where the loss of industrial land can be justified, priority should be given to the loss of sites near good public transport provision to support housing and more intensive employment uses.</p> <p>The Borough should be satisfied that the remaining industrial land will meet the growing and changing demands of a variety of industrial and related uses to meet local and strategic need over the lifetime of the Plan and that the size of the areas support their servicing and act as a buffer to other more sensitive land uses.</p>
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)</p> <p>Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?</p> <p>The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so, which areas and why?</p> <p>As mentioned above, the economy of London is changing and consequently so are the employment floorspace requirements of many business occupiers.</p> <p>Despite overall job growth predicted in London, the latest GLA employment projections [footnote: GLA Employment Projections http://data.london.gov.uk/dataset/gla-employment-projections] for London show a large decline in the sectors traditionally associated with industrial floorspace. By 2036:</p> <ul style="list-style-type: none"> • manufacturing is predicted to decline by 50%; • wholesale by 27%; • transportation and storage by 9%; and • primary and utilities by 13%. <p>Sectors which are expected to grow over the same period are those mostly requiring office type</p>

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						<p data-bbox="1016 236 1285 260">floorspace. For example:</p> <ul data-bbox="1066 309 2092 469" style="list-style-type: none"> <li data-bbox="1066 309 2092 368">• the professional, real estate, scientific and technical services sector is expected to grow by 35%; <li data-bbox="1066 376 1666 400">• accommodation and food service activities by 34%; <li data-bbox="1066 408 1599 432">• information and communication by 34%; and <li data-bbox="1066 440 1682 469">• administrative and support service activities by 28%. <p data-bbox="1016 517 2130 639">This is likely to lead to a significant decrease in the need for industrial premises in London by 2036 and coupled with the increasing importance of service and technology based employment across London and the need for housing, it is important that the balance between retaining industrial sites and providing for alternative land uses is carefully considered.</p> <p data-bbox="1016 683 2141 903">Wandsworth is dominated by small and medium sized enterprises (less than 250 employees) at over 99% of all businesses in the borough [footnote: NOMIS UK Business Counts (Enterprises) 2015] and with the vast majority of these being ‘micro businesses’ (less than 10 employees). The majority of these SMEs are in sectors typically requiring office floorspace rather than industrial with the most prevalent SME sectors being the professional, scientific and technical sector, information and communication sector, business administration and support services sector and the arts, entertainment, recreation and other services sector.</p> <p data-bbox="1016 951 2130 1038">Whilst naturally these projections would need to be considered in more detail against other published projections and market signals, it is likely that the release of some industrial sites for other uses will be a conclusion of the Employment Land Review.</p> <p data-bbox="1016 1086 2130 1206">In light of the above, it would be logical to review the LSIA in the first instance as they are smaller, are of less strategic importance to London and are often located within or adjacent to what are primarily residential areas. Therefore they should generally be considered for release prior to any release in the Strategic Industrial Locations (SILs).</p> <p data-bbox="1016 1254 2141 1374">The Bendon Valley LSIA is small (approximately 4.8 ha) relative to other similarly designated sites and is bounded by residential use to the north, east and south and by the River Wandle to the west. As shown in the photographs of the site in Appendix A, parts of the site are not currently being utilised to their full potential and some of the buildings are aging, in poor condition and deteriorating.</p> <p data-bbox="1016 1422 2141 1445">Further details relating to our client’s site and the wider Bendon Valley LSIA can be found in Appendix A</p>

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						<p>of this letter, however in summary:</p> <ul style="list-style-type: none"> • Number 38-54 Lydden Road is a single storey building with a flat roof built in the early 1960s. Although currently occupied some leases are nearing expiry and the premises, whilst in reasonable condition considering its age, are nearing the end of its useable life and will be requiring redevelopment in the medium to long term. • It is located towards the north-western boundary of the LSIA and as such is immediately adjacent to residential properties. Therefore any redevelopment would be limited to that which is suitable in a residential area due to potential issues such as noise and traffic movements. • Some of the current occupiers of 38-54 Lydden Road are owner occupiers who have operated from these premises for 10 years or more and have expressed intentions to retire within the next few years. Poorer condition premises will tend to depress the level of rents that can be achieved and this in turn impacts upon level of investment that can be made and the viability of the premises in the longer term. • Despite being fully occupied, we have estimated that the site is currently operating at a density of around 85sqm per employee which is extremely low compared to the average densities set out in the Home and Communities Agency (HCA) Employment Densities Guide. The HCA Guide states that the average density for new B1c floorspace is around 47 sqm per job, therefore even if the site were redeveloped with the same amount of modern B1c floorspace at around 47sqm per job it could achieve a considerable increase in the number of jobs provided on the site. • The wider Bendon Valley LSIA already contains a mix of uses including employment, residential and leisure and is therefore not operating as its intended industrial allocation would suggest. The LSIA is in a poor strategic location for industry as it is located in a primarily residential area and the roads in the area are often heavily congested. The roads within and immediately adjacent to the LSIA are small and congested due to on-street parking issues, leading to issues with deliveries and the general maneuvering of large vehicles. • Parts of the LSIA are vacant and in poor condition (such as the former Mecca Bingo Hall and car park) and are therefore not actively contributing towards the economy of the area and are having a negative visual impact on the surrounding residential properties. Other parts of the site, such as the Riverside and Earlsfield Business Centres, which offer flexible office/studio space, are performing better and achieving greater employment densities (although some vacant space is advertised). However, if these business centre sites are excluded, the remainder of the LSIA has a very low employment density. <p>Based on the above, it is clear that Bendon Valley is not performing as a high quality industrial location</p>

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						<p>and is having a negative amenity and visual impact in this largely residential area. Despite its industrial designation, it currently contains a mix of uses which include residential and leisure and therefore is more aligned to the 'Mixed Use Former Industrial Employment Areas' (MUFIEAs) allocation in the Local Plan.</p> <p>The MUFIEA allocation allows for a residential component on site where net employment floorspace equivalent to at least existing employment space is provided, in particular space for small and medium sized enterprises. We have made representations on this policy under 3.2.2 below.</p> <p>In the absence of an up to date evidence base, it is difficult to comment on whether complete de-designation of the area or re-designation to a MUFIEA type allocation would be most appropriate. To establish this, the Employment Land Review evidence document will determine how much industrial floorspace is needed in Wandsworth overall. What is clear however at this stage even without the floorspace need information is that the Bendon Valley LSIA is not fit for or operating as its allocated purpose.</p> <p>If the report concludes that there is sufficient floorspace available in other strategic locations in Wandsworth to meet the needs of those sectors which are expected to be maintained and/or grow, it would be appropriate to de-designate all or parts of the Bendon Valley LSIA to allow for much needed residential development. However, if the report concludes that some employment floorspace is still required, given the existing mixed use nature of this site and its neighbouring residential use, it would be appropriate to allocate the site for mixed use including residential.</p>
	Office Estates Ltd	Colin Sinclair	DP9	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p><u>2) Strategic Issues: Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA)</u></p> <p>We welcome the Council's intended review of its approach concerning Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA). We consider that a more flexible approach to development proposals within these areas would be reasonable, where the underlying objective of planning policy is to protect and encourage employment growth and economic activity.</p> <p>It is considered that where it can be demonstrated that a mix of uses, including residential, can co-exist on such sites, in such a way that modern design can overcome the traditional view that the non-industrial uses would lead to the curtailing of business activities, then other such uses should be encouraged. Other uses can help deliver other benefits of the Development Plan, such as the creation of sustainable, mixed and balanced neighbourhoods within the Borough.</p> <p>With regards to the type of criteria which should be considered when prioritising potential SIL and LSIA</p>

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						sites for release, it is considered that any such sites within Opportunity Areas should specifically be prioritised. In doing so, their release can help deliver the aspirations for these areas which seek to support high density housing, mixed-use commercial intensification and transport improvements.
	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Employment and Industry Review (preparation stage) — response to consultation</p> <p>We are writing on behalf of our client, Schroders Real Estate Investment Management (Schroders), to respond to the London Borough of Wandsworth Employment and Industry Review preparation stage consultation.</p> <p>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.</p> <p>National Policy Direction</p> <p>Paragraph 17 of the National Planning Policy Framework (NPPF) states that 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. It continues that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth.</p> <p>It is important to note that the Government is currently consulting on changes to the NPPF. The consultation document continues the Government’s priority to make as much use of brownfield land in driving up housing supply.</p> <p>Background</p> <p>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 and 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</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>works.</p> <p>Schroders is also considering opportunities for future development at and around the site. Schroders welcomes the opportunity to respond to the Employment and Industrial Land Review in the context of its future aspirations for the Battersea Studios site and the surrounding area.</p> <p>Battersea Studios and the surrounding area</p> <p>Battersea Studios is located on the western edge of the Queenstown Road Strategic Industrial Area (SIL) in an area that is designated as an Industrial Business Park (IBP). To the west of the site is a logistics and distribution site which is also located within the IBP. To the south is a rail depot, the frontage of which on Silverthorne Road is within the IBP. To the north of the site is an access road leading from Silverthorne Road to the heart of the industrial zone and beyond this a warehouse. The remaining frontage to Silverthorne Road leading up to Queenstown Road, including part of the cement site, is also located within the IBP.</p> <p>Paragraph 5.6 of the Development Management Policies Document (February 2012) states that the IBP is identified in the Local Plan for firms that need better quality surroundings, generally require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in Preferred Industrial Locations (PILs). The Park Town Conservation Area Appraisal notes that the Stewart's Road Study was prepared to look at how to make better use of the industrial area; improve accessibility to the area and the appearance of the public realm. Of particular importance is the treatment of the frontage to Silverthorne Road as a transition between the residential and industrial areas.</p> <p>In this context, Schroders has been considering the opportunities presented for the IBP to act as a transition or buffer zone between the Park Town residential area and the heavier industrial uses in the SIL.</p> <p>Wandsworth Local Plan: Employment and Industry Review</p> <p>The preparation stage consultation document paragraph 3.2 'Strategic Issues — Strategic Industrial Locations and Locally Significant Industrial Areas' asks the questions "should we allow mixed use development or other uses in any of these areas and what other uses do you think are appropriate in these areas?".</p> <p>While it is understood that the Council currently protects and promotes light industrial, general industry</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>and storage and distribution within SILs, through Policy DM11 'Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIA5)', Schroders considers that this consultation process represents an opportunity to consider how to promote a greater variety of uses within IBP locations and in particular on the site.</p> <p>Schroders suggests that the Council should review the mix of uses that are appropriate to be located in the IBP, which could include housing. It also believes that there is an opportunity to masterplan the IBP to explore how it could achieve significant new mixed use development.</p> <p>Schroders also considers that the consultation presents an opportunity to 'realign' the boundary of the IBP to create a more regular shaped zone. This could be achieved by bringing the eastern boundary back to a consistent line behind Battersea Studios.</p> <p>Summary</p> <p>Schroders considers that the IBP, including Battersea Studios, presents an excellent opportunity to introduce a mix of uses, including housing, to the area which would complement and enhance the area's existing and future employment potential, and the contribution that the IBP makes in creating a transition between residential and heavier industrial areas.</p> <p>On behalf of Schroders we welcome the opportunity to meet to discuss these representations with your team and to contribute to the Employment Land Study being prepared by the Council. If you have any questions please contact me or my colleague Vicky Cartwright (020 7303 4172).</p>
	St William Homes	Hayley Ellison	Boyer Planning Ltd	Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>3.2.1 Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)</p> <p>Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?</p> <p>The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so,</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>which areas and why?</p> <p>As mentioned above, the economy of London is changing and consequently so is the employment floorspace requirements of many business occupiers.</p> <p>Despite overall job growth predicted in London, the latest GLA employment projections for London show a large decline in the sectors traditionally associated with industrial floorspace. By 2036:</p> <ul style="list-style-type: none"> • manufacturing is predicted to decline by 50%; • wholesale by 27%; • transportation and storage by 9%; and • primary and utilities by 13%. <p>Sectors which are expected to grow over the same period are those mostly requiring office type floorspace. For example:</p> <ul style="list-style-type: none"> • the professional, real estate, scientific and technical services sector is expected to grow by 35%; • accommodation and food service activities by 34%; • information and communication by 34%; and • administrative and support service activities by 28%. <p>This is likely to lead to a significant decrease in the need for industrial premises in London by 2036 and coupled with the increasing importance of service and technology based employment across London and the need for housing, it is important that the balance between retaining industrial sites and providing for alternative land uses is carefully considered.</p> <p>Whilst naturally these projections would need to be considered in more detail against other published projections and market signals, it is likely that the release of some industrial sites for other uses will be a conclusion of the Employment Land Review.</p> <p>In light of the above, it is appropriate to review the LSIA's in the first instance as they are smaller, are of less strategic importance to London and are often located within or adjacent to what are primarily residential areas. Therefore, they should generally be considered for release prior to any release in the Strategic Industrial Locations (SILs).</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>The Central Wandsworth LSIA is immediately adjacent to Wandsworth Town Centre, which has undergone significant redevelopment in recent years and has the potential to deliver new housing through regeneration of the Ram Brewery site in the town centre, and immediately south of the LSIA.</p> <p>Much of the land contained within the Central Wandsworth LSIA has, historically, been occupied by utilities infrastructure, which generates low levels of employment. It is appropriate to review the necessity of the allocation in this location given the changes to technology and the functioning of such uses. Clearly an evidence base is required; however, given the particular circumstances of this site it seems appropriate that it could be considered a priority for de-designation or re-designation for mixed use to enable other priorities within the Local Plan to be achieved.</p>
Unknown	TR Property Investment Trust PLC	Mr Chris Brown		Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Strategic Issues</p> <p>Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIAs)</p> <p>With regard to Policy DMI1 of the DMPD, it appears counter intuitive to afford the same blanket protection to both SILs and LSIAs when they are both different designations with different characters and uses. We would recommend that the two designations be split into two separate policies with their own levels of protections made clear. It is recommended that the SIL designation would be granted the highest level of protection from loss of industrial practices, whilst the LSIA would be granted similar protection but could be afforded similar levels of protection unless a site is no longer suitable and viable for its existing or alternative industrial use in the medium to long term.</p> <p>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. Other Local Plans have introduced a clause into their LSIA/LSIS policies which would require the applicant to submit proof the property being actively marketed over a period of 18months or more along with a financial viability assessment to convey that the property is not in demand. The policy could promote employment generating uses to replace these unsuitable industrial sites whilst ensuring that the proposed use would not compromise the function of the LSIA or the operating conditions of the remaining uses or potential future use of neighbouring sites. 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.</p> <p>The Council must 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</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>developers and businesses to ensure availability of a range of workspaces, including startup space, co-working space and 'grow-on' space'.</p> <p>In summary we believe that the existing policy should address the differing aims of the SIL and LSIA designations.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA) – there are very few industrial areas left in Wandsworth and the presumption should be to maintain what we do have. This is particularly true for employment uses that do not mix well with residential (including where deliveries/HGV access required). Where land may not be suitable for the type of historical industrial use in the past, consideration should be given to smaller scale employment uses such as workshops, studios, etc. which can provide an opportunity to increase employment densities. LSIA land north of Wandsworth Town Centre may provide opportunities for mixed use development but should include substantial employment uses reflecting proximity to transport links and existing business activities.</p>
	Workspace Group PLC	Mr Chris Brown		Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA)	3.2.1	<p>Strategic Issues</p> <p>Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIAs)</p> <p>With regard to Policy DMI1 of the DMPD, it appears counter intuitive to afford the same blanket protection to both SILs and LSIAs when they are both different designations with different characters and uses. We would recommend that the two designations be split into two separate policies with their own levels of protections made clear. It is recommended that the SIL designation would be granted the highest level of protection from loss of industrial practices, whilst the LSIA would be granted similar protection but could be afforded similar levels of protection unless a site is no longer suitable and viable for its existing or alternative industrial use in the medium to long term.</p> <p>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. Other Local Plans have introduced a clause into their LSIA/LSIS policies which would require the applicant to submit proof the property being actively marketed over a period of 18months or more along with a financial viability assessment to convey that the property is not in demand. The policy could promote employment generating uses to replace these unsuitable industrial sites whilst ensuring that the proposed use would not compromise the function of the LSIA or the operating conditions of the remaining uses or potential future use of neighbouring sites. 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</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>contradictions between policies and the existing condition of the land.</p> <p>London Plan Policy 2.17, Part B(c) of the Further Alteration to the London Plan (FALP) (2015) directly addresses SILs and dictates that development proposals in SILs should be refused unless ‘the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors’. This clear policy directive is not reflected in the Council’s current legislation (DMI1) and should be accommodated. Emerging policy must also 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’.</p> <p>As addressed above we believe that our site at Havelock Terrace, Battersea should be released from the SIL. The site holds significant potential to cater for the SME market, increasing both the density and quality of employment space on offer. Paragraph 2.84 of the London Plan conveys the potential for a strategically co-ordinated process of consolidation, or where it addresses a need for accommodation for SMEs or new emerging industries – a factor which is not currently addressed by Wandsworth’s current employment policies.</p> <p>The Council must 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 startup space, co-working space and ‘grow-on’ space’. At present this is not addressed in Policy DMI1 and should be As previously stated, Workspace are committed to developing high quality space for SMEs which incorporate a mix of other uses such as residential, and community facilities such as crèches and nursery’s in order to provide comprehensive and supportive development which designed to benefit local businesses and residents.</p> <p>In summary we believe that the existing policy should address the differing aims of the SIL and LSIA designations. The policies are too restrictive in their current form and fail to acknowledge the suitability of SME space and the potential for the collaborative regeneration of these areas as recommended in the Further Alterations to the London Plan (2015)</p>
	Charterhouse Property Group	Kieran		Strategic Industrial Location (SIL)	3.2.1	POINT PLEASANT WORKS, PUTNEY BRIDGE ROAD, SW18 1TU

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
		Wheeler		and Locally Significant Industrial Areas (LSIA)		<p>REPRESENTATIONS FOR THE EMPLOYMENT AND INDUSTRY REVIEW</p> <p>Further recent discussions with my colleague, Tom Faulkner, in connection with the above site, I write on behalf of my client, Charterhouse Property Group (Charterhouse) to provide representations to the Employment and Industry Review in relation to the release of the site.</p> <p>1. Site and Surrounding Area</p> <p>The site measures approximately 0.08 hectares and is broadly rectangular in shape. It is currently occupied by a single storey building with associated hardstanding which is used as an equipment and tool hire business (Sui Generis).</p> <p>The site is bound by a railway line to the north, by a four storey office building to the south, the junction of Putney Bridge Road and Point Pleasant to the west and an electrical sub station to the east. On the western side of Putney Bridge Road, opposite the site, is a three storey public house and beyond lies period residential housing ranging between two and three storeys in height. To the north, beyond the railway line, the area comprises large new build residential developments, ranging from 4 storeys to 21 storeys in height.</p> <p>The site is located approximately 300m north of Wandsworth High Street, which has a wide and thriving selection of local amenities, including commercial floorspace, shops, community uses, and cafes / restaurants and bars, and Wandsworth Town Centre is defined as a Major Centre in the London Plan. In addition, Wandsworth Park is 120m from the site, which also provides access to the Thames Path.</p> <p>The site is not located in a conservation area, but is located adjacent to Wandsworth Town Conservation Area. In addition, the site is not located within an Archaeological Priority Area.</p> <p>The site has a PTAL rating of 4, indicating a moderate to good level of access to public transport. The site is in close proximity to Wandsworth Town National Rail Station (750 metres), East Putney London Underground Station (850 metres), and the bus stops along Putney bridge Road (which provide services to Central London and Vauxhall in the east, Hammersmith and Putney in the west and Earlsfield and Tooting in the south).</p> <p>2. Planning History</p> <p>In terms of planning history, the site was the subject of a planning application, approved in July 2000, for: Use for the hire of tools and construction equipment (LPA Ref: 2000/1298 C). There are no other</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>relevant planning applications recorded on the Council's website.</p> <p>3. Planning Policy Framework</p> <p>The emerging redevelopment proposals have taken account of the national, regional, and local planning policy framework. The statutory development plan comprises:</p> <ul style="list-style-type: none"> • London Plan (2015); • Core Strategy (2016); and • Development Management Policies Document (DMPD) (2016). • Site Specific Allocations Document (2016). <p>4. Locally Significant Industrial Area (LSIA) Designation</p> <p>The site is currently identified as within the Central Wandsworth Locally Significant Industrial Area (LSIA) and therefore covered by. Policy DMI 1 of Wandsworth's Development Management Policies Document. This states:</p> <p><i>"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"</i></p> <p><i>"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."</i></p> <p>From recent discussions with you, we understand that the council is currently undertaking an Employment and Industry Review to determine whether any of the existing LSIA allocations could be amended to alternative uses. It is considered the Point Pleasant Works site should be removed from the Central Wandsworth LSIA for the following reasons:</p> <p><i>Isolated Position</i></p> <p>The site is located in the north western corner of the LSIA, on the periphery of the designated area. It is separated from the main industrial area by Sudlow Road, a residential street comprising period terraced housing. It is not considered to be part of the core industrial area, rather a transition site, between</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>areas of general industrial uses and residential uses. The site is therefore considered to be isolated from the majority of the LSIA.</p> <p><i>Existing Use</i></p> <p>The site is currently occupied by an equipment and tool hire business (Sui Generis) and therefore it does not function in line with the majority of the other uses within the LSIA (Use Classes B1c, B2 and B8). There is also a larger tool hire business located on Ferrier Street to the east of the site. The site immediately south of the Point Pleasant Works site, also located within the LSIA, comprises an office building (Use Class B1a), which again does not function in line with the majority of the other uses within the LSIA.</p> <p><i>Mixed Use Surroundings</i></p> <p>Residential uses (Use Class C3) are located in close proximity, comprising a gated development at the junction of Oakhill Road and Putney Bridge Road and period residential terraced housing along Oakhill Road. The site sits adjacent to an office block (Use Class B1a) and opposite a public house (Use Class A4) located on the western side of Putney Bridge Road. The site's setting is characterised by mixed 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.</p> <p>5. The Proposed Development</p> <p>In light of the above, Charterhouse considers that a mixed use development on the site, comprising ground floor commercial uses and residential accommodation above would be more appropriate given the location and function of the site. In addition, Charterhouse considers that an office building (Use Class B1a) on the site would also be appropriate. Charterhouse has prepared two schemes on these bases which have been submitted to the council for pre-application advice with a view to bring forward a detailed planning application later this year for the redevelopment of the site.</p> <p>Please feel free to contact me or my colleague, Diana Thomson (0203 320 8250 or dthomson@savills.com), of these offices in the first instance if you have any queries or would like to discuss.</p>
Mr Alan				Mixed Use Former industrial	3.2.2	It is very important to keep mixed use in areas to keep life on the streets during the day, to support local shops and services etc. There seems to be a tendency for developers only to provide expensive office space in order to meet their commitments, which when unsurprisingly when they can't let it, they

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Pates				Employment Areas		can convert into residential space. We also badly need business start up kinds of spaces, spaces where someone could start a small manufacturing process, workshops for small enterprises such as fashion designers etc, railway arch kind of space.
Mrs Helen Evans				Mixed Use Former industrial Employment Areas	3.2.2	Mixed development helps create and sustain communities and reduces the need to commute out of an area to work, so reducing transport congestion.
Mr Mark Poulter	Putney Society			Mixed Use Former industrial Employment Areas	3.2.2	Yes. All B class uses
Mr Stewart Murray	Greater London Authority			Mixed Use Former industrial Employment Areas	3.2.2	Mixed Use Former Industrial Employment Areas It is unclear whether the use of 'former' here refers to industrial land that has already been released as part of recent Local Plan review or if it assumes that this review will result in the release of industrial land. Any loss of industrial land should be supported by evidence, and only released where it has been demonstrated that it is surplus to local and strategic needs. Where the loss of industrial land can be justified, the preferred alternative land use should be informed by the Borough's Employment Study. Where appropriate, alternative employment uses could be complemented with residential development. As stated above, in line with London Plan policy 4.4, where the loss of industrial land can be justified, priority should be given to the loss of sites near good public transport provision to support housing and more intensive employment uses.
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Mixed Use Former industrial Employment Areas	3.2.2	3.2.2 Mixed Use Former industrial Employment Areas Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas? As outlined in our response to 3.2.1, we believe that Bendon Valley should be either de-designated entirely or at least re-designated to a MUFIEA type allocation due to its existing mix of employment,

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>residential and leisure uses and its very close proximity residential areas.</p> <p>The current MUFIEA policies allow for a residential component where:</p> <ul style="list-style-type: none"> • Net employment floorspace equivalent to at least existing employment space is provided. In particular space catering for small and medium sized enterprises will be sought. • New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment area. • Existing surrounding uses will not have an adverse impact on the amenity of new residential space. <p>Whilst we agree with this approach in general, the requirement to provide net employment floorspace equivalent to at least existing employment space 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 [LOPR Update 2014 https://www.london.gov.uk/what-we-do/planning/london-plan/london-office-policy-reviews] 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.</p> <p>It is therefore considered that a more flexible approach should be sought in MUFIEAs which would allow the replacement of the equivalent number of jobs rather than the equivalent employment floorspace.</p>
	St William Homes	Hayley Ellison	Boyer Planning Ltd	Mixed Use Former industrial Employment Areas	3.2.2	<p>3.2.2 Mixed Use Former industrial Employment Areas</p> <p>Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas</p> <p>As outlined in our response to 3.2.1, we believe that the Central Wandsworth LSIA should be either de-designated entirely or at least re-designated to a MUFIEA type allocation due to its low employment generating potential and its proximity to the town centre.</p> <p>The current MUFIEA policies allow for a residential component where:</p> <ul style="list-style-type: none"> • Net employment floorspace equivalent to at least existing employment space is provided. In particular space catering for small and medium sized enterprises will be sought.

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<ul style="list-style-type: none"> • New uses are compatible with neighbouring uses and will not harm the viability of the surrounding employment area. • Existing surrounding uses will not have an adverse impact on the amenity of new residential space. <p>Whilst we agree with this approach in general, the requirement to provide net employment floorspace equivalent to at least existing employment space 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 London¹ 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.</p> <p>It is therefore considered that a more flexible approach should be sought in MUFIEAs which would allow the replacement of the equivalent number of jobs rather than the equivalent employment floorspace.</p>
Unknown	TR Property Investment Trust PLC	Mr Chris Brown		Mixed Use Former industrial Employment Areas	3.2.2	<p>Mixed Use Former Industrial Employment Areas (MUFIEAs)</p> <p>We generally support the objectives of Policy DM12. The flexibility afforded by the MUFIEA designation encourages rather than restrains new development and appears to provide a fantastic opportunity to diversify employment uses on site whilst intensifying the uses that currently operate on site. The designation would suit our current vision for the area, 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.</p> <p>The development of suitable business space for Small and medium-sized enterprises (SMEs) should be more given more prominence within this 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 DM12. 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).</p> <p>Therefore encourage the Council to continue utilising this policy in future legislation and to engage with our client in relation to the potential for our clients' site to be designated as a MUFIEA.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>Our client would strongly welcome the opportunity to meet with the Council's consultants and officers to provide a guided tour of the Ferrier Street site in order to provide more information on its existing tenants and development. We also hope to open a dialogue with officers to discuss the key issues outlined above and our suggestions for the formulation of future policy.</p> <p>We look forward to hearing your views in relation to the above in due course.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Mixed Use Former industrial Employment Areas	3.2.2	<p>Mixed Use Former industrial Employment Areas – where these are in proximity to local centres and transport links, there is every reason to suggest that business/employment uses will be viable. In these areas, employment uses that mix well with residential can be appropriate and add diversity and vibrancy to an area. Mixed use has recently been taken to mean overwhelmingly residential and there should be a more balanced view, including office and employment space being provided on upper floors.</p>
	Workspace Group PLC	Mr Chris Brown		Mixed Use Former industrial Employment Areas	3.2.2	<p>Mixed Use Former Industrial Employment Areas (MUFIEAs)</p> <p>We support the broad aims of Policy DM12. The flexibility afforded by the MUFIEA designation encourages rather than restrains new development. Our client's model for regeneration (detailed above) thrives in such conditions as the policy encourages the incorporation of multiple uses (including commercial, employment, residential and community facilities) on site in order to generate meaningful development on sites.</p> <p>Although there is a brief reference of SMEs in paragraph 5.8 and 5.13 of the policies' explanatory text, this could perhaps be addressed more directly. In paragraph 5.13 makes reference to the demonstrated need for flexible B1 space to be utilised by SMEs. We believe that this policy would greatly beneficial in relation to our two sites above if they were to be re-designated as MUFIEAs.</p> <p>We would therefore encourage the Council to continue utilising this policy in future legislation and to engage with our client in relation to the potential for both of our clients' sites to be designated as MUFIEAs. We would also encourage that the promotion of SMEs are given more prominence in this policy and other relevant polices such as Policy PL 6 (Meeting the needs of the local economy).</p> <p>I can confirm that we would be more than happy to meet with you and your colleagues to discuss the key issues outlined above and our suggestions for the formulation of future policy.</p> <p>We look forward to hearing your views in relation to the above in due course.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Mr Alan Pates				Offices	3.2.3	Yes.
Mrs Helen Evans				Offices	3.2.3	Yes
Mr Mark Poulter	Putney Society			Offices	3.2.3	Yes. Town centres are where offices should be located and policies should be much tougher on loss of existing. The policy for where to develop new offices is sadly not that relevant.
Mr Stewart Murray	Greater London Authority			Offices	3.2.3	Offices As per industrial uses, the need and provision of office space should be informed by the Borough's Employment Study.
	Office Estates Ltd	Colin Sinclair	DP9	Offices	3.2.3	<u>3) Strategic Issues: Offices</u> We consider that various sites outside of town centres and focal points of activity are also capable of delivering high quality, sustainable office developments within the Borough, where they benefit from good transport links. As such, we would support more flexibility within the emerging Employment and Industry Review Local Plan document concerning this issue.
	St William	Hayley	Boyer Planning	Offices	3.2.3	3.2.3 Offices

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
	Homes	Ellison	Ltd			<p>Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?</p> <p>As outline above, 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 support service activities sectors.</p> <p>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.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Offices	3.2.3	Offices – there is a need to halt further erosion of the borough’s office provision. It is also important to provide office space in sufficient quantity in well located areas. Town centres are the priority given the need for businesses to access customers and staff and their connectivity will make them competitive locations.
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Offices	3.2.3	<p>3.2.3 Offices</p> <p>Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?</p> <p>As outline above, 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 support service activities sectors.</p> <p>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.</p>
Mr				Waste	3.2.4	Appropriate

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Alan Pates						
Mr Mark Poulter	Putney Society			Waste	3.2.4	Yes. We are going to continue to need waste sites. Lots of new homes in addition to more recycling has increased demand for processing, so existing sites and relevant land next to them needs to be safeguarded.
Mr Stewart Murray	Greater London Authority			Waste	3.2.4	Waste Wandsworth's waste policy should be in line with the London Plan and the National Planning Policy Guidance on waste. The Borough will need to satisfy itself that it has safeguarded sufficient land to meet its waste apportionment and that the sites or areas have the potential to be used as waste sites, for example by assessing whether neighbouring land uses would preclude a waste use due to potential disturbance from noise, vehicular movements etc
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Waste	3.2.4	3.2.4 Waste It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and sites in the Employment and Industry Local Plan document. Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities? No comments on waste at this stage.
Mr	RB Kensington & Chelsea			Waste	3.2.4	Wandsworth Local Plan: Employment and Industry Review Thank you for giving the Royal Borough of Kensington and Chelsea the opportunity to respond to the

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Jonathan Wade						<p data-bbox="1021 236 1895 260">London Borough of Wandsworth's Local Plan: Employment and Industry Review.</p> <p data-bbox="1021 308 2141 595">You will no doubt be aware that Wandsworth has been working closely with Kensington and Chelsea, Hammersmith and Fulham, Lambeth and the Old Oak Park Royal Development Corporation, as Waste Planning Authorities, to produce a joint evidence base and an "Engagement Statement", regarding the authorities' waste apportionments. Currently all of Kensington and Chelsea's municipal waste goes to the Western Riverside Waste Authority's facilities in the London Borough of Wandsworth for transfer and treatment. It is essential that the existing waste management facilities are not prejudiced by the release of existing employment or industrial land to other uses. This could be through the release of the actual sites themselves or by the development of adjoining sites in ways which may prove incompatible with the neighbouring waste use.</p> <p data-bbox="1021 643 2119 730">The sites of particular importance to Kensington and Chelsea Council are the Western Riverside Transfer Station near Wandsworth Bridge and the Cringle Dock Transfer Station next to the Battersea Power Station site.</p> <p data-bbox="1021 778 2141 1129">These comments are made in light of the statutory Duty to Cooperate which places a legal duty on Councils to engage "constructively, actively and on an on-going basis" in "maximising the effectiveness" of Local Plans relating to "strategic matters" which may impact on at least two planning areas including in connection with infrastructure which is strategic [footnote: S331 Planning and Compulsory Purchase Act 2004; NPPF paragraphs 156; 178-181; NPPG Duty to Cooperate]. The Duty applies to activities relating to the preparation of "Local Plan" documents and supporting activities, so far as relating to a strategic matter. It is considered that the Wandsworth Local Plan: Employment and Industry Review must be prepared in accordance with the Duty for these reasons. Within London, the National Planning Practice Guidance (NPPG) on the Duty to Cooperate considers that the extent of any cooperation required will depend on the extent to which strategic issues have been addressed in the London Plan [footnote: Paragraph 007].</p> <p data-bbox="1021 1177 1917 1201">In light of this, the Council would welcome the continued engagement and dialogue.</p> <p data-bbox="1021 1249 2096 1305">Aside from this we have no further comments on the review at this stage. We look forward to being consulted further as the review progresses.</p> <p data-bbox="1021 1353 2119 1409">I trust you will find these comments useful. If you have any queries regarding the Council's response, please do not hesitate to contact my colleague, Chris Turner.</p>

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	St William Homes	Hayley Ellison	Boyer Planning Ltd	Waste	3.2.4	<p>3.2.4 Waste</p> <p>It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and sites in the Employment and Industry Local Plan document.</p> <p>Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities?</p> <p>No comments on waste at this stage.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Waste	3.2.4	Waste – sites reserved for waste management are strategically important. There is an opportunity to integrate such sites more effectively in their surroundings through appropriate investment in business premises that are less sensitive neighbours and can help to ease the transition with nearby residential areas
Mr Mark Poulter	Putney Society			Spatial Approaches	3.3	<p>Yes. We should have spacial strategies. Town centre plans are entirely appropriate. The detail SSADs are an excellent idea but it is hugely disappointing that little attention is paid to them when applications are being determined. More attention seems to be paid to justifying why they should not be adhered to rather than why they should.</p> <p>We are unhappy with the comment that such approaches might “overburden development partners”. This suggests that individual developers have a special relationship with the Council that might a. override the interests of existing residents and b. the fundamentals of local neighbourhood planning indicates where and what is judged appropriate for an area and it is not for a commercial developer to determine and force through the largest most inappropriate thing that they can get away with. The use of the phrase shows a deep misunderstanding of what planning policies are for. They are supposed to be a burden, justified by public benefit. ‘Sustainable’ development is supposed to mean something that makes long term sense, not ‘maximum’.</p>
Katharine	Historic England			Spatial Approaches	3.3	Thank you for the opportunity to comment on the partial review of the Local Plan policies relating to employment and industry.

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
Fletcher						<p>As the government’s adviser on the historic environment we have considered this in light of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Accordingly, the comments in this response are put forward to ensure consistency with the NPPF and the National Planning Policy Guidance and related advice in the Good Practice Advice Notes.</p> <p>As a general point the historic environment implications of any change in policy, including changes to site allocations, should be fully integrated into the process, including through Strategic Environmental Appraisal. In order to facilitate this, we recommend that an appropriate level of analysis is carried out to establish the significance of the borough’s industrial heritage and employment legacy.</p> <p>At our recent meeting we discussed how a characterisation study of Wandsworth’s historic environment would be an invaluable evidence base from which to understand the significance of the borough’s built and archaeological heritage as a whole. A borough-wide approach would be the most effective in providing a comprehensive overview; however, it is possible to conduct more localised characterisation exercises too, tailored to the areas under examination. The recent outline study of Old Oak Common former industrial area is one example [footnote: This is an outline assessment and can be found on Historic England’s website at: http://research.historicengland.org.uk/Report.aspx?i=15319&ru=/Results.aspx?p=352]. The assessment would then inform the parameters for the sites included in the Area Spatial Strategies referred to in the consultation document.</p> <p>In addition to broad characterisation there may be identifiable individual heritage assets that require further assessment at this stage. Historic England is currently conducting research into the significance of gas holders nationally, and we would be pleased to discuss with you the likely heritage interest of industrial heritage in the areas under consideration. As part of any assessment of heritage significance you should contact the Greater London Archaeological Advisory Service (GLAAS) to establish the above and below ground significance of undesignated heritage assets within the sites under review.</p> <p>Finally, it is worth noting the potential for heritage assets within former industrial land to be the</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>catalyst for heritage-led regeneration as identified in the London Plan, policy 7.9. Evaluating the sensitivities and opportunities of heritage assets to inform and guide master planning parameters can pay dividends in terms of creating distinctive, attractive environments. Examples of successful schemes in which heritage has been the key to unlocking positive change can be found on our website. [Footnote: Examples of heritage-led regeneration are available at: http://historicengland.org.uk/advice/heritage-at-risk/industrial-heritage/our-industrial-heritage/re-using-industrial-sites/]</p> <p>We would be pleased to discuss these comments with you.</p>
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Spatial Approaches	3.3	<p>3.3 Spatial Approaches</p> <p>The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.</p> <p>Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?</p> <p>No comments on spatial approaches at this stage.</p>
	St William Homes	Hayley Ellison	Boyer Planning Ltd	Spatial Approaches	3.3	<p>3.3 Spatial Approaches</p> <p>The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.</p> <p>Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?</p> <p>No comments on spatial approaches at this stage.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Spatial Approaches	3.3	<p>Spatial Approaches – adopting a detailed spatial approach can provide policy certainty for developers and occupiers. Being clear on what uses are acceptable should enable appropriate development and will only burden those developers seeking to go against policy. Making Wandsworth attractive for innovative and far sighted developers and investors to provide a range of business premises would be a</p>

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						positive step.
Mrs Helen Evans				Specific Policies	3.4	Business rates for start ups / incubators could be reviewed
Mr Mark Poulter	Putney Society			Specific Policies	3.4	<p>Part 1.</p> <p>NO. The policies would have been satisfactory if they had been applied but they have not and thus they have failed dismally to protect the existing supply. Demand exceeds supply and there are no redundant premises, just ones that the owners for some reason don't let or do not want to let. Demand for office space in Wandsworth will increase again as a result of the H&P Bill. The Council has also allowed the words "office" and "commercial" to become confused. "Office" space has been allowed to transmute into "commercial" space allowing higher wage professional workspace to be confused with smaller numbers of living wage retail jobs. Developers misrepresent the viability of offices by allowing offices to fall into disrepair and Council allows them to get away with this, all driven by the vastly increased profit developers make from obliterating office space, reducing employment, and being allowed to turn the space into residential.</p> <p>Part 2 Support of small businesses. Yes. Do part 1. Stop allowing the loss of small offices and working premises(compounded by PD). People need other services to live in a well-rounded, fully functioning community not just another chain supermarket or the 23rd coffee shop. Erico House on the URR, Lenta offices oversubscribed. There is an oversupply of shops in some areas, but these convert easily to small offices. Shortage of space = high rents which is bad for ANY type of business.</p>
Mr Charles Muriithi	Environment Agency			Specific Policies	3.4	<p>Wandsworth Local Plan: employment and industry review – preparation stage</p> <p>Thank you for consulting the Environment Agency on the above. We agree with the approach to produce a single Employment and Industry Local Plan document. The consultation document recognises that in recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development, due to the high demand for housing and the difference in land values between these uses. The ongoing regeneration schemes in the borough will increase demand for</p>

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						<p>industrial and logistics space.</p> <p>There is need to continue to protect Strategic Industrial Location (SIL) and Locally Significant Industrial Areas (LSIA). DTZ in the 2010 Employment Land and Premises Study concluded that all SILs and LSIAs are either of sufficient quality or in enough demand to be protected for industrial employment uses. However, the Environment Agency does not comment on comparative assessment of land, its availability or suitability for a particular form of development, or the sustainability justifications of development and other material planning considerations as these are beyond the scope of the Environment Agency role, save where a particular land use is prohibited within Flood zone 2 or 3, or is the subject of the application of the Exception Test.</p> <p>We agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach although we have no idea how other strategies will impact on the plan. The borough has recently reviewed the local plans including the core strategy and Development Management Policies Document (DMPD). We have had Lombard Road/York Road riverside focal point and Roehampton Supplementary Planning Documents (SPDs) consultations recently. There is need to align employment and industry review with the recently adopted documents and other emerging plans.</p> <p>The Vauxhall Nine Elms Battersea is a designated "opportunity area" in the London Plan. It includes 182 hectares of land on the South Bank between Battersea Park and Lambeth Bridge. Already a planning framework for the area has been prepared and approved. A series of major regeneration schemes are planned for the area including the new US Embassy complex and the redevelopments of Battersea Power Station and New Covent Garden Market. The preparation of the planning framework involved major landowners and developers in the area, the London boroughs of Wandsworth and Lambeth, the Greater London Authority and Transport for London. Therefore there is need for close working relations with all parties involved and cross-boundary working should form part of work under the Duty to Co-operate.</p> <p>When reviewing the site allocations for employment and industry land, the council should consider how other objectives could be achieved too. For example sites would help deliver improvements to watercourses and biodiversity and therefore contribute to delivering a better environment. Opportunities to look for an integrated approach to future development should be criteria for site allocations or changes. So improving biodiversity along with flood risk and urban run off may provide multiple benefits for the local community.</p> <p>We would wish to see the document take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan. It should also reflect the</p>

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						<p>riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.</p> <p>It's essential the review of site allocations help to deliver resilience to a changing climate. New and existing infrastructure across the borough such as bridges, roads, railways and electricity sub stations should be carefully designed, located and maintained to remain safe and operational during a major flood event or drought.</p> <p>Our detailed comments are attached below for your consideration. Please do not hesitate to contact me should you wish to discuss this further.</p> <p>Thames Estuary 2100 (TE2100) Plan</p> <p>We would wish to see the employment and industry land review incorporating Thames Estuary 2100 (TE2100) Plan requirements to address our main environmental concerns. This should include managing tidal flood risk in accordance with the measures set out in the TE2100 plan taking into account the ability to implement future improvements to flood defences.</p> <p>The employment and industry land review should reflect the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements. Development and regeneration in Wandsworth should be located and designed to be resilient to flood risk, climate change and reduce reliance on traditional flood defences. Location and design should be informed by the latest evidence on flood risk and climate change.</p> <p>Wandsworth to Deptford policy unit</p> <p>The flood risk management policy set out in the TE2100 Plan for Wandsworth is as follows:</p> <p>The</p> <p><i>Wandsworth to Deptford policy unit: Policy P5, to take further action to reduce flood risk beyond that</i></p>

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						<p><i>required to keep pace with climate change</i></p> <p>. This means that the standard of protection against tidal flooding will be increased in the future. This will be achieved by improvements to the main tidal flood barrier on the Thames (currently the Thames Barrier at Charlton) together with improvements to the other flood defences e.g. river walls.</p> <p>The Wandsworth to Deptford policy unit extends from Wandsworth to Nine Elms and includes residential areas (mainly high rise flats) with riverside paths, commercial and industrial premises with no public riverside access, and Battersea Park. The tidal defences extend along the lower reach of the River Wandle in Wandsworth.</p> <p>The ground level in much of the policy unit is low (at between 0 and 2m AOD) whereas the level on the Thames frontage is generally higher (typically 4m AOD). Thus there would be great difficulty evacuating floodwater should flooding occur. In some areas the defence line is integrated into buildings with a riverside walkway that is liable to occasional flooding. Actions involving cross-boundary working between local councils should therefore consider the following:</p> <ul style="list-style-type: none"> • A consistent approach to improving the flood defences at the boundary between the London Borough of Wandsworth and the London Borough of Richmond. This should include collaboration on flood management and other improvements to the Beverley Brook. • A consistent approach to improving the flood defences and the riverside at the boundary between the London Borough of Wandsworth and the London Borough of Lambeth at Nine Elms. <p>Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the</p>

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						<p>order of 10 metres. More space may be required especially if wider requirements are to be achieved.</p> <p>There is scope in Wandsworth for local flood defence realignments to achieve landscape, public amenity and environmental enhancements, for example at new development sites. Where realignments of the existing defences are envisaged, land will be required including an allowance for future defence rising.</p> <p>Strategic Flood Risk Assessment</p> <p>The borough has 8 kilometres of Thames riverside stretching from Putney in the west downstream to Nine Elms in the east. This area has experienced considerable redevelopment. The Strategic Flood Risk Assessment (SFRA) reveals that a significant number of potential development sites on the Thames riverside fall within Flood Zones 2 and 3a.</p> <p>We seek the following outcomes relating to flood risk management:</p> <ul style="list-style-type: none"> • Policies and site allocations ensure no inappropriate development is located in areas at high risk of flooding • Ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere • Local Plans contribute to reducing flood risk for existing communities • Council identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risks • Partnership working to secure financial contributions to flood defence schemes from planning charges where appropriate • Managing tidal flood risk in accordance with the measures set out in the TE2100 plan. Developments should take into account the ability to implement future improvements to flood defences, in accordance with the Environment Agency's TE2100 Plan. <p>Surface Water Management</p> <p>The Surface Water Management Plan has identified thirteen Critical Drainage Areas (CDAs) within or</p>

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						<p>crossing the administrative boundary of the London Borough of Wandsworth. The borough is the 'lead' in terms of managing flood risk within eleven of these CDAs, and within the remaining two as the 'supporting' borough. It will be necessary to work in partnership with other boroughs to manage flood risk within several of the CDAs. The greatest number of receptors is at risk from surface water flooding along the route of the 'lost' Falcon Brook, which runs north to south through the east of the borough - Clapham Junction CDA. Significant ponding of surface water (>0.5m) is modelled to impact Tooting Bec, Summerstown and South Balham.</p> <p>There are recorded surface water flooding problems in the Falcon Road (Clapham Junction area), South Balham and Lavender Hill areas. The Clapham Junction and Tooting Bec CDAs are impacted from upstream surface water flows from the London Borough of Lambeth, and it will therefore be important that the flood risk is managed at a catchment scale by both Councils.</p> <p>There are a number of opportunities for measures to be implemented across the borough to tackle surface water flood risk. Ongoing maintenance of the drainage network and small scale improvements are already undertaken as part of the operations of the borough. In addition, opportunities to raise community awareness of the risks and responsibilities for residents should be sought, and London Borough of Wandsworth may wish to consider the implementation of a Communication Plan to assist with this.</p> <p>Pluvial modelling undertaken as part of the SWMP has identified that flooding within the London Borough of Wandsworth is heavily influenced by existing and historic river valleys, and impacts a number of regionally important infrastructure assets. To address local flood risk in the London Borough of Wandsworth it is recommended that, in the short to medium-term, Wandsworth Borough Council:</p> <ul style="list-style-type: none"> • Undertake a Drainage Capacity Study in the Falcon Road / Clapham Junction area in conjunction with Thames Water to determine local drainage capacity, connections and identify flood mitigation options through detailed modelling; • Confirm the resilience of infrastructure to surface water flooding through engaging with energy operators, TfL and Network Rail regarding the surface water flood risk to the Electricity Substation on Copper Mill Lane, red routes and York Road / Trinity Road Pumping Station, and key railway infrastructure (railway cuttings and stations) identified to flood throughout the Borough respectively, and confirming the drainage assumptions used within the SWMP pluvial modelling; • Identify the scope for undertaking local drainage investigations in North Tooting Graveney Summerstown and agree a timetable for undertaking these (dependent on funding availability). Build on the findings of the Drainage Capacity Study proposed for Clapham

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>Junction); and</p> <ul style="list-style-type: none"> Investigate the feasibility for flood storage opportunities and flood mitigation measures in Garratt Park and Wimbledon Stadium Business Park area and Tooting Bec Common in conjunction with Environment Agency and Network Rail respectively. <p>Waste Management</p> <p>The ongoing regeneration in the borough will see substantial new residential and mixed-use development, and this will give rise to significant quantities of waste, during construction and occupation. Waste reduction and recycling needs to be fully considered and implemented in the design phase, the construction phase as well as the operational phase. The Vauxhall Nine Elms Battersea (VNEB) Opportunity Area Planning Framework (OAPF) contains three safeguarded wharves:</p> <ul style="list-style-type: none"> Cringle Dock – an operational waste site (Western Riverside Waste Authority). Specialist infrastructure enables waste transfer activities to take place in a covered dock. Kirtling Wharf – an operational aggregates wharf (Cemex) which has planning permission to increase throughput of the wharf. Middle Wharf – currently non-operational but considered to be capable of being made viable for waterborne freight handling purposes and may be required for construction of the Thames Tunnel. Following completion of the tunnel it should be brought back into operational wharf use and be able to contribute to the shortfall in wharf capacity in West London. <p>In line with the London Plan, the safeguarded wharves will continue to be safeguarded for waterborne freight handling uses in the long term, subject to frequent review. Use of the wharves for transportation of construction and demolition materials will play a key role in reducing the number of road freight vehicle movements in the area during the construction period and such opportunities should be maximised.</p> <p>Local waste management activities that are poorly run can pollute the environment, cause harm to human health and generate nuisance impacts for local communities. Illegal waste activity can blight local areas as well as polluting the environment and causing harm to human health. Waste and resource management can also support economic growth and the creation of new jobs.</p> <p>Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Waste Local Plans can</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>help prevent this by making sure that sites for waste facilities are located and designed to minimise their impact. Improved waste management can also contribute to reducing greenhouse gas emissions, including through the use of waste materials to generate renewable energy.</p> <p>Waste is a strategic matter under Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011) and is referred to as one of the strategic infrastructure priorities in the NPPF (paragraph 156). This means that waste will often be subject to the Duty to Cooperate. Effective planning for waste infrastructure needs to reflect the needs of neighbouring authorities, or further afield in the case of some waste streams such as hazardous waste or other specialist waste streams.</p> <p>The outcomes we want to see:</p> <ul style="list-style-type: none"> • Businesses and other organisations reduce the impacts of their activities on air, land and water, using resources efficiently and minimising waste disposal and manage their waste responsibly. • The right waste and resource management infrastructure is in place. <p>The Environment Agency has three main roles in waste and industry regulation:</p> <ul style="list-style-type: none"> • We are the main organisation responsible for the regulation and permitting of complex industrial processes and waste management activity in England, through the application of statutory regimes (such as the Environmental Permitting Regulations). • We are responsible for tackling serious illegal waste activity. • We are an advisor to Government and local councils on waste and waste infrastructure planning. We provide data and information on waste, waste management and environmental pressures and limits to help them with their work and decisions. <p>Groundwater and Contaminated Land</p> <p>Redevelopment of some sites may present constraints due to land contamination arising from previous use. National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>person, is presented (NPPF, paragraph 121).</p> <p>The contaminated land regime in Part 2A of the Environmental Protection Act 1990 tackles the historical legacy of land contamination but does not take into account possible future uses which would need a specific grant of planning permission. To ensure a site is suitable for its new use and to prevent unacceptable risk from pollution, the implications of contamination for new development would be considered by the council to the extent that it is not addressed by other regimes.</p> <p>Information on the most common industrial activities and the risk of contamination is in Volume 2, Annex 3 of 'Guidance for the Safe Development of Housing on Land Affected by Contamination', published by the Environment Agency, NHBC and CIEH. More information is also available from industry profiles published by the Environment Agency.</p> <p>Contaminated Land Advice</p> <p>If potentially contaminating activities have previously been conducted at this site, such as chemical or fuel storage, or other industrial processes, an assessment of risks to controlled waters from the land should be carried out and submitted to the Bromley council.</p> <p>This work should follow the framework in the 'Model Procedures for the Management of Land Contamination' (CLR11), Defra / EA 2004. Risks to controlled waters should be evaluated in accordance with the 'Environment Agency guidance on requirements for land contamination reports'. These documents can be downloaded from our website at http://www.environment-agency.gov.uk/subjects/landquality/113813/887579/1101611/?lang=_e</p> <p>Climate Change</p> <p>The flood risk climate change allowances are being revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. This is due to be published in autumn 2015 and will replace previous climate change allowance. The main change to the allowances will be for peak river flow. Allowances will be provided for each river basin district, similar to those in 'Adapting to climate change: Guidance for flood risk management authorities'. We will update 'Adapting to climate change: Guidance for flood risk management authorities' so the allowances are consistent. Land use planning decisions should be based on the latest and most accurate climate change data and evidence.</p> <p>https://www.gov.uk/government/publications/flood-and-coastal-risk-guidance-climate-change-</p>

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						<p>allowances</p> <p>For other most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment-agency/</p>
	Ipsus Developments Ltd	Ms Helen Courtney	Boyer	Specific Policies	3.4	<p>3.4 Specific Policies</p> <p>Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?</p> <p>Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?</p> <p>Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?</p> <p>No comments on specific policies, other than those already discussed above in our response to 3.2.2 in relation to the replacement of employment floorspace in MUFIEAs and the re-designation of the Bendon Valley LSIA in our response to 3.2.1.</p>
Lucy Owen	Port of London Authority			Specific Policies	3.4	<p>Thank you for consulting the PLA about the Wandsworth Local Plan Employment and Industry Review. As you are aware from the PLA's representations on the recent Local Plan Review, the protection of the Borough's safeguarded wharves, in line with the requirements of the NPPF and policy 7.26 of the London Plan is imperative to prevent their loss to housing. This was the very reason why safeguarding was implemented in London and I have set out below for your information the background on wharf safeguarding:</p> <p>Background on Wharf Safeguarding</p> <p>During the early 1990's, the PLA became aware that a disproportionate number of operational wharves in London were being redeveloped for alternative, higher value uses. Research undertaken by the PLA indicated that between 1987 and 1994, over 20 operational wharves had been redeveloped with a resultant and permanent loss in cargo handling capacity.</p> <p>The PLA and the London Planning Advisory Committee (LPAC) were instructed by Government to</p>

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						<p>prepare a list of wharves for protection. This work was presented to the River Thames Working Group and ultimately resulted in the publication, in February 1997, of Regional Planning Guidance Note 3B/9B (Strategic Planning Guidance for the River Thames). This Guidance refers to the need for wharf protection on the River Thames in London at Paragraph 3.52, which states that:-</p> <p>“Many sites for freight transport and other river-related uses are under development pressure or have been lost within recent years: they are a diminishing and finite resource.”</p> <p>The strategic policy context underpinning the principle of safeguarding riparian wharves in London was provided at paragraph 3.53, which states that:-</p> <p>“The Secretary of State therefore considers it is important in the broader strategic interest that some sites which are currently, or could potentially be, used for the transshipment of freight, including waste and aggregates, and for river related activities, should be retained and safeguarded against development that could preclude their future use for these purposes.”</p> <p>To accompany RPG3B/9B the Secretary of State for the Environment identified 32 wharves suitable for cargo handling that should be safeguarded. Directions were served to Local Planning Authorities under Section 12 (7A) of the Town and Country Planning Act 1990 (which required authorities to have regard to the maintenance of specified wharves in formulating their development plans) and under the Town and Country Planning (General Development Procedure) Order 1995 (SI 1995/419) concerning the handling of any planning applications received for these sites.</p> <p>On assumption of his planning powers in July 2000 through the Town and Country Planning (Mayor of London) Order 2000, (SI 2000/1493) (now replaced by the Town and Country Planning (Mayor of London) Order 2008), the Mayor was required to be consulted on planning applications affecting any part of a safeguarded wharf. The Mayor was also given power to direct local planning authorities to refuse planning applications affecting any part of a safeguarded wharf. New directions, reflecting these statutory changes, were served on relevant local planning authorities.</p> <p>The Directions play an important role in protecting lesser value uses – enabling the wharves to be retained for the purpose for which they are protected: waterborne cargo handling uses. Once a wharf is lost, it is lost forever.</p> <p>The Mayor of London indicated in Towards the London Plan, published in 2001, that the status of both the extant and other wharves proposed for safeguarding would be reviewed periodically.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>The London Plan Implementation Report: Safeguarded Wharves on the River Thames was published in January 2005, and submitted to the First Secretary of State for his consideration. The report recommended that of the 28 wharves safeguarded at the time, 25 wharves, should retain their status. A further 25 wharves, principally located downstream of the Thames Barrier were also recommended for safeguarding.</p> <p>It was confirmed, in June 2005, that the First Secretary of State concurred with the Mayor of London's recommendations contained within the Implementation Report, and accordingly issued new directions where appropriate so as to formally safeguard a total of 50 wharves.</p> <p>In accordance with commitments made within the published (2011) London Plan the Mayor, together with his project partners, commenced a review of all the safeguarded wharves within London and to consider whether it is appropriate to safeguard facilities on the canal network. A consultation document was subsequently produced in October 2011 entitled Safeguarded Wharves Review 2011/2012. As a result of consultee comments and to provide clarification and updates in terms of national policy, a second more limited consultation was undertaken in 2012. The resultant document, Safeguarded Wharves Review Final Recommendation – March 2013 is now with the Secretary of State for approval. Nine safeguarded wharves are recommended for release and one additional wharf is proposed for safeguarding.</p> <p>London Plan policy 7.26 protects safeguarded wharves for waterborne freight handling uses only; supports proposals which increase the use of safeguarded wharves for waterborne freight transport, especially on wharves currently not handling freight by water and; requires developments adjacent or opposite safeguarded wharves to be designed to minimise the potential for conflicts of use and disturbance.</p> <p>Proposed Review</p> <p>There is no in principle objection to the production of a single Employment and Industry Local Plan document but the scope of the document must be clear and the protection required through the London Plan must be given to the Borough's safeguarded wharves. At the moment it would appear that Core Strategy Policy PL9 (which safeguards 5 wharves for transshipment of freight) is not included in the review however it is noted that the policy approach to waste sites will be reviewed. As you will be aware two of the Borough's waste sites are located on safeguarded wharves (Cringle Dock and Smugglers Way) and therefore the review will need to ensure that any policy approach to waste sites reflects policy 7.26 of the London Plan and the London Plan's waste policies.</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
	St William Homes	Hayley Ellison	Boyer Planning Ltd	Specific Policies	3.4	<p>3.4 Specific Policies</p> <p>Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?</p> <p>Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?</p> <p>Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?</p> <p>No comments on specific policies, other than those already discussed above in our response to 3.2.2 in relation to the replacement of employment floorspace in MUFIEAs and the re-designation of the Central Wandsworth LSIA in our response to 3.2.1.</p> <p>We request that all of the comments above are considered as part of the Employment Land Review process and request the opportunity to be involved in the work of the consultants once appointed. We understand from discussions with your officers that there will be further opportunity to submit information to the consultants as part of the Employment Land Review process and request to be notified when this opportunity arises.</p>
Mr David Wilson	Thames Water	David Wilson	Savills	Specific Policies	3.4	<p>WANDSWORTH LOCAL PLAN: EMPLOYMENT AND INDUSTRY REVIEW, PREPERATION STAGE – COMMENTS ON BEHALF OF THAMES WATER</p> <p>Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water’s appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water in relation to their statutory undertakings.</p> <p>As you will be aware, Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a ‘specific consultation body’in accordance withthe Town & Country Planning (Local Planning) Regulations 2012. Our comments on behalf of Thames Water are set out below:</p> <p>A key sustainability objective for the preparation of the Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p><i>include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: “ Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy 5.14 of The London Plan, March 2015, relates to Water Quality and Wastewater Infrastructure and states: “LDF preparation</p> <p>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”</p> <p>Policy 5.15 of The London Plan relates to Water Use and Supplies.</p> <p>Thames Water consider that the Local Plan should include specific text covering the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).</p> <p>Such a policy is required to ensure the infrastructure is provided in time to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of “soundness” for Local Plans.</p> <p>In order that the Local Plan is effective and compliant with national planning policy and guidance,</p>

Full Name	Company / Organisation	Agent Name	Agent Company	Title	Number	Comment
						<p>Thames Water consider that text along the following lines should be added to the new Local Plan :</p> <p><i>“The Council will seek to ensure that there is adequate surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.”</i></p> <p>Such a policy/supporting text is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades. In some circumstances it may be necessary to apply a planning condition on the new development to ensure that the infrastructure upgrades are in place ahead of occupation of the development.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.</p>
Steve Pinto	Wandsworth Chamber of Commerce			Specific Policies	3.4	<p>Specific Policies – specific policies allied to a vision for growing local SMEs would be welcomed. Such policies should aim to reflect current day trends in the provision of business space which encourage a broad range of uses. New forms of space such as co-working spaces and serviced office space need to be enabled, especially as part of mixed use and town centre developments where many residents will wish to run their own business. Whilst larger industrial floor space is likely to be less viable, there is strong demand for light industrial units and workshops for many businesses who seek (and are willing to pay for) an inner London location. Many of London’s key sectors such as creative businesses, design companies, the food sector, precision engineering and advanced manufacturing create a demand for such space. A common issue is having access to high quality broadband connections and related infrastructure; specific policies can help to ensure that new investment addresses any current local gaps.</p>



Wandsworth Council

Housing and Community Services Department
Town Hall
Wandsworth High Street
London
SW18 2PU

Please ask for/reply to: Rob McNicol
Telephone: 020 8871 6000
Direct Line: 020 8871 8814
Email: planningpolicy@wandsworth.gov.uk
Web: www.wandsworth.gov.uk/planningpolicy

10 December 2015

* Name and Address

Dear Sir/Madam

Wandsworth Local Plan: employment and industry review – preparation stage

The Council is producing a new Local Plan document covering employment premises and industrial land. This new document will form part of the Local Plan for Wandsworth, setting out relevant planning policies and allocating sites. It will replace the employment and industrial land policies in the existing Local Plan documents, the Core Strategy, Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD). At the same time the Council will be starting work on the full review of the Local Plan which will include review of all other policy matters.

In recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development, due to the high demand for housing and the difference in land values between these uses. As well as providing the housing that the Borough needs, the Council also needs to ensure that the future requirements for industrial sites and employment uses are met. It is therefore necessary to carry out a review of Local Plan policies and site allocations relating to industry and employment in order to ensure that our approach is up-to-date and based on the latest evidence, and that the Local Plan as a whole strikes the right balance between housing and employment uses.

This letter invites you to make representations on the Council's proposed areas of review. These are set out below, along with details of how to respond. The consultation will be carried out between 11 December 2015 and 29 January 2016.

Proposed Areas for Review

1. Overall Approach:

Do you agree that the approach described above – to produce a single Employment and Industry Local Plan document – is the best way to plan for these uses in the Borough?

Director of Housing and Community Services: Brian Reilly

2. Strategic Issues:

a. Strategic Industrial Location and Locally Significant Industrial Areas:

Should we continue to protect these areas for industrial uses? Are there other areas we should protect? Should we allow mixed use development or other uses in any of these areas? What other uses do you think are appropriate in these areas? What criteria should the Council use for determining which land should be released? If any of these areas are released from industrial use, what level of employment uses should be required as part of any redevelopment?

The Council is considering whether there are particular industrial areas that should be prioritised for release. During the previous Local Plan review, representations were made suggesting the release of sites in the LSIA north of Wandsworth town centre in particular, and it is recognised that the gas holder site may be decommissioned over the next few years. Do you consider that this area should be prioritised for release? Do you think that one or more other areas should be prioritised and, if so, which areas and why?

b. Mixed Use Former industrial Employment Areas:

Should we continue to seek mixed use redevelopment of former industrial employment areas? What employment uses should be considered appropriate in these areas?

c. Offices:

Should we continue to focus office development in town centres and focal points of activity in the Thames riverside area?

d. Waste:

It is not intended to review the Borough's waste apportionment figure or to call for new or alternative waste sites at this stage; this will be carried out as part of the full Local Plan review. However, the Borough's existing allocated waste sites are located in or close to areas allocated for industrial use and in order to consider these areas comprehensively, we intend to review the policy approach to waste sites in this review and to include waste policies and sites in the Employment and Industry Local Plan document.

Is our current approach to waste sites and waste development appropriate? Is there a need to give additional protection from neighbouring development that might prejudice waste management activities?

3. Spatial Approaches:

The current Local Plan contains Area Spatial Strategies providing more detailed guidance for development in the areas of greatest change. The Strategies allow for the implementation of Local Plan objectives through planning new development in a co-ordinated spatial manner.

Do you agree that including detailed proposed Area Spatial Strategies for areas of significant change is the right approach? How can we ensure that these encourage sustainable development, rather than overly burden development partners?

4. Specific Policies

Do current office policies strike the right balance between protecting viable offices and allowing redevelopment of redundant premises?

Is there more that we should be doing to encourage small and growing businesses in the Borough? How could this best be reflected in planning policy?

Should we have specific policies relating to particular business types, such as creative industries? Are there any particular business types that should be nurtured, encouraged or protected, and how could this be achieved?

How to find out more information

Details including the consultation timetable are available on the Council website at www.wandsworth.gov.uk/employmentlandreview

How to respond

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

We encourage you to respond on-line, as this greatly assists us in collating, analysing and considering the responses. If you are not able to respond on-line, please email planningpolicy@wandsworth.gov.uk or send written responses to:

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

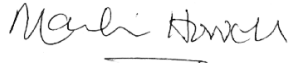
Responses must be received by Friday 29 January 2016.

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

Technical Details

This consultation is being carried out in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations set out how the Council has to prepare Local Plan documents and require the Council to issue notifications of the subject of a local plan that it is proposed to prepare. In the interests of clarity, the areas of review set out above should be considered to be the subject of the local plan.

Yours faithfully,

A handwritten signature in black ink that reads "Martin Howell". The signature is written in a cursive style and is positioned above a short horizontal line.**Martin Howell**

Group Planner – Policy & information

Memorandum

From: HCS Planning Service

Contact: Rhian Williams

Extn: 7218

Our Ref: Local Plan - libraries

To: The Librarian

Wandsworth Library (5 TC
libraries & Planning offices)

Date: 10 September 2015

Wandsworth Local Plan: employment and industry review – preparation stage

The Council is producing a new Local Plan document covering employment premises and industrial land. This new document will form part of the Local Plan for Wandsworth, setting out relevant planning policies and allocating sites. It will replace the employment and industrial land policies in the existing Local Plan documents, the Core Strategy, Development Management Policies Document (DMPD) and the Site Specific Allocations Document (SSAD).

We are inviting responses on the consultation between **11 December 2015** and **29 January 2016** either through our consultation portal <http://wandsworth-consult.limehouse.co.uk/portal>, by email to planningpolicy@wandsworth.gov.uk or to:

Planning Policy
Environment and Community Services Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London SW18 2PU

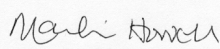
We have advertised via the Council website and by letter to local groups and other key stakeholders that copies of the above document is available for reference at selected local libraries.

Please find attached a copy of the document, which is clearly marked and should be available for users of your library for reference purposes only. We are encouraging electronic responses but further paper copies are available on request. Hopefully the material is self-explanatory but further information and downloadable versions of all the documents can be found on our website:

www.wandsworth.gov.uk/employmentlandreview

If you, your staff or any visitor to your library wants further information, copies of the documents, or to discuss matters, then please give me or my colleagues a ring on 020 8871 6647, 6649, 6650 or 7218.

Thanks very much for your help,



Martin Howell
for Assistant Director (Planning and Environmental Services)