

28 February 2022

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

Dear Sirs

**DRAFT WANDSWORTH LOCAL PLAN, REGULATION 19 CONSULTATION
REPRESENTATIONS ON BEHALF OF MGLW**

Please find below and in the attached 'Linford Street Vision' document, representations on behalf of our clients, MGLW who are the owners and occupiers of economic space on Linford Street, in Battersea/Nine Elms.

MGLW are the owners and operators of a granite and marble supply business serving customers throughout London and the southeast from their premises at 33, 44 and 55 Linford Street. They have operated from a series of post war industrial buildings for many years and are part of the economic character of the area.

Like many premises in this part of Battersea and Nine Elms, the economic premises are old and poorly meet modern requirements, having been adapted over many years to meet changing circumstances. They require redevelopment in order to meet current and future business needs. In doing so however, there is significant potential to enhance the utilisation of the sites and the surrounding area.

It is recognised that this is late in the Local Plan process. However, given that the proposals and policies of the Draft Local Plan have yet to be finally resolved, the purpose of these representations is to start a conversation with Wandsworth Council and stakeholders over the potential future options for the sites in the Linford and the northern part of Stewart's Road of which they form part. The area is covered by Proposed Policy PM3 Nine Elms, which we comment on below.

These representations address the following policies:

PM3 Nine Elms Area Strategy

We believe that the placemaking proposals for Nine Elms omit the area around Linford Road and Stewart's Road, which lie in an accessible location between the Patmore Estate and Covent Garden to the east and the BDTQ to the west, a short distance south of the new Battersea Power Station underground station. There is no evidential rationale for doing so and the area, which is part of the Nine Elms and Vauxhall

OAPF, could and should, for part of the future development of the Borough and contribute to meeting its needs. Its location is shown in Figure 1 below.

Map 5.1 Creative Clusters

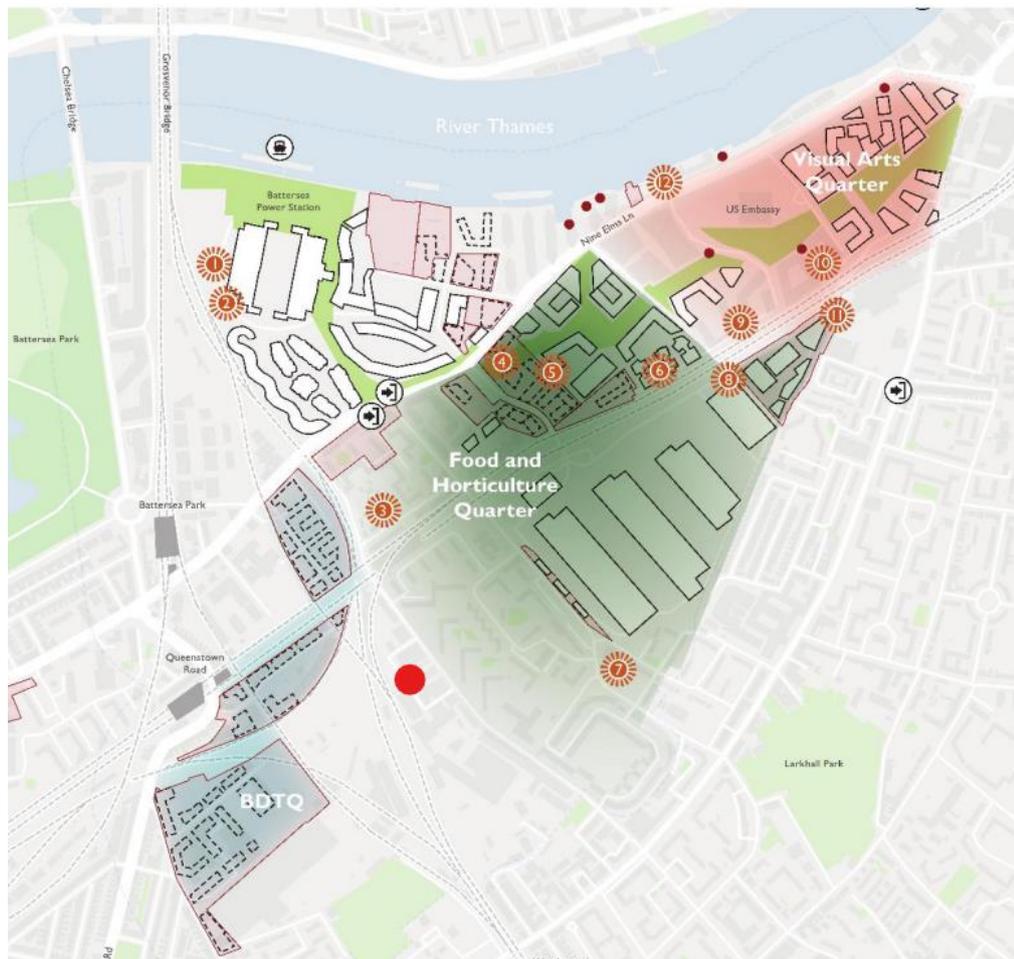


Figure 1: General Spatial Strategy from the Local Plan Review (site location marked red)

Proposed Mixed Use Allocation

Land at 33, 44 and 55 Linford Street, Battersea/Nine Elms, Wandsworth SW8 4VN

It is proposed in these representations that the sites edged red should be identified as allocations in the Local Plan for mixed use economic led redevelopment, which can include a re-provision and increase in economic space for business use in class E and/or B2/B8 with residential and related uses over. There should be no net loss of economic space and the proposals should not prejudice continued economic use on adjoining land.

The wider area shown edged blue is proposed in these representations to be identified as an area of opportunity and change, where economic led, mixed use development would be considered and supported, provided it safeguarded the overall quantum and quality of economic space and ensured the ongoing function of the area.

It is important to note that Linford Street and Stewart’s Road lie within the Nine Elms Vauxhall Opportunity Area as defined in the London Plan and Wandsworth Local Plan. It does therefore, for part of the wider area within which the majority of economic and housing growth is to be targeted under the terms of strategic, London wide policy. There is, therefore, a basic presumption in favour of development that would support such growth.

It is also clear from Figure 2 below, that the area outlined in blue:

- a) forms a discrete area bounded by the railway to the west and Stewart’s Road to the east. Subject to the safeguarding of the southern boundary, it would be feasible to prepare a masterplan and development brief for the area under the terms of a proposed allocation in the Local Plan, to secure the phased redevelopment of the area to maintain and enhance its economic function and optimise its contribution to the future supply of employment space and new homes.
- b) the existing nature of economic space within the area is sub-optimal and there is significant potential for intensification and rationalisation of space to improve both quantum, flexibility and efficiency to meet modern business needs.

One illustration of how this might be achieved, to the substantial benefit of the economy of the area, is illustrated in the attached ‘Linford Street Vision’ prepared by CGL Architects.

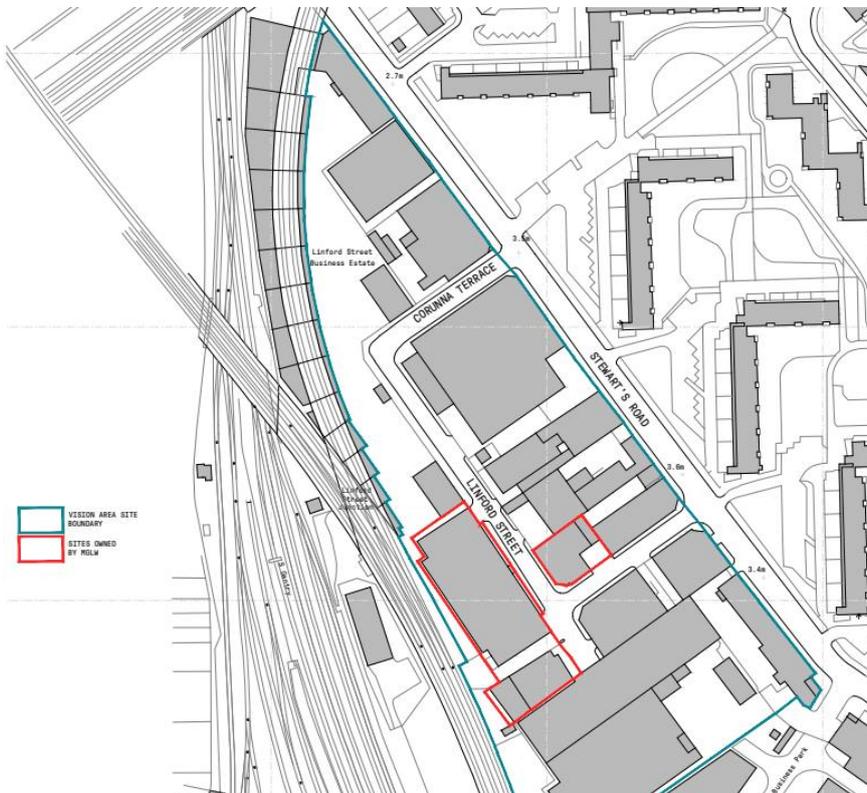


Figure 2: Proposed Allocation and Proposed Development Brief Area

The proposed allocation would be appropriate for midrise and some taller buildings to optimise the contribution from the redevelopment of the site to housing needs and as far as this is consistent with a design led approach to the masterplanning of the area. The frontage of Stewart's Road can be enhanced through redevelopment to provide an enhanced form and consistent frontage in a mid-rise scale. To the rear (west) nearer to the railway line, there is opportunity for greater scale and some taller buildings.

The character of Stewart's Road is mixed, particularly in the north. Influenced by post war reconstruction, to the west there are a variety of older buildings in economic use with some more recent residential conversions and some more recent industrial spaces. To the east lies the Patmore Estate, comprising post war apartment buildings ranging from 4 to 7 storeys in height, with the closest buildings being predominantly 6 storeys set within a landscaped environment.

The area is within 500m or 10 minutes' walk of the new Battersea Power Station underground station and a similar distance to Battersea and Queenstown Road overground stations giving a range of good transport options. Regular bus services (P5) operate every 15 minutes on Stewart's Road and further regular services run on Wandsworth Road 5 minutes south and Battersea Park Road to the north.

LP1 Design Led Approach

The overall aims and approach of the policy is supported and demonstrates how development can be positively managed and designed to ensure the objectives set out in these representations can be achieved.

LP2 General Development Principles

The overall aims and approach of the policy is also supported, to ensure development provides for a mix of uses, including for new homes of a mixed-tenure and type, employment opportunities and which deliver strong cultural, recreational, and social services and facilities to support daily life as part of walkable neighbourhoods and do not prejudice existing and future occupiers/uses.

LP4 Tall and Mid-Rise Buildings

There is already provision within the proposed Local Plan for taller buildings within the Battersea and Nine Elms zone and Battersea Design and Technology Quarter (BDTQ). While the overall aims of Policy LP4 is supported, which seek to ensure that taller buildings are appropriate to their context and are properly designed and planned, the definition of anything over 7 storeys as being a tall building combined with the restriction to certain defined areas, restricts the potential for sites to be optimised. It potentially rules out sites where there might be a combination of mid rise and taller buildings appropriate to their context.

Hence, we would propose that the policy should offer some flexibility that the definition of anything above 7 storeys will not rule out taller buildings where this is judged to be an appropriate design response.

We would also, in the alternative, propose that Map 23.3 of the Battersea Tall Building Zone should be amended to show the north-western part of Stewart's Road and Linford Road as suitable for a tall building zone, subject to the proper masterplanning of the area.

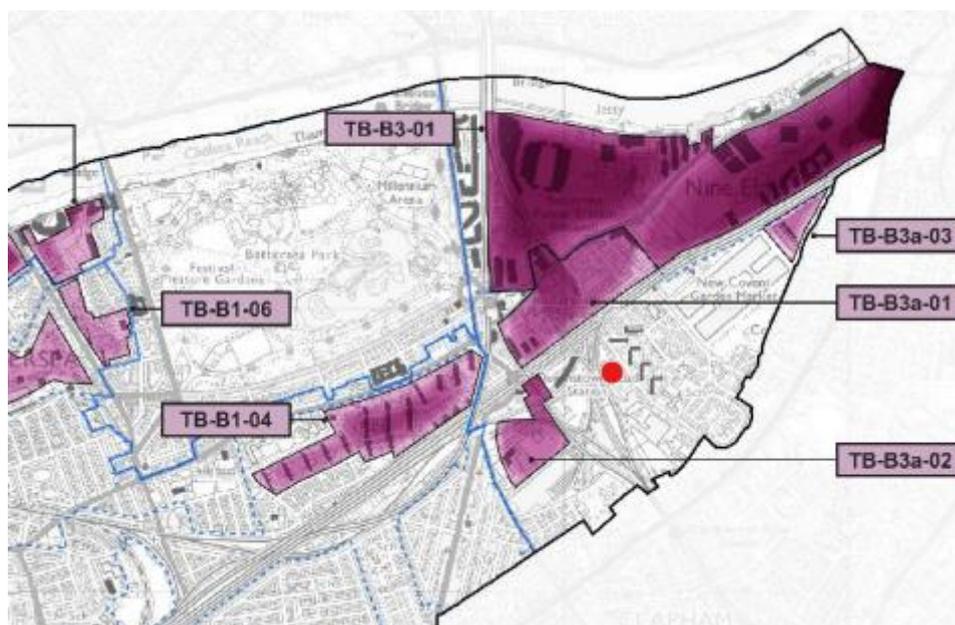


Figure 3: Proposed Additional Tall Building Location

LP33 Promoting and Protecting Offices

The land identified in Figure 2 should be identified as being suitable for mixed use economic led development, including a wide range of employment related uses including industry, storage and distribution, sui generis uses, workshops, offices and studios falling in use classes B8, B2, Class E (g) and sui generis use.

Priority should be given to economic land uses but to fully optimise development of the land, residential uses in the airspace above these economic uses should be supported where this is consistent with the maintenance and enhancement of the primary economic use.

It is clear that the northern part of Stewart’s Road and Linford Street enjoy similar levels of accessibility to the proposed BDTQ and border residential uses of the Patmore Estate. The area comprises a range of different types of employment including showrooms, warehousing, the food industry and brewing and offices and workshops. The mix of uses is both appropriate and should be maintained going forward. It provides a supply of small-scale office and workshop premises formerly in class B1 and now in class e (g) which are both appropriate and for which there is significant demand. This has been informed by discussions with local commercial agents who are familiar with the area advice from which has been input to the masterplan proposals. While these proposals would be the subject of stakeholder engagement going forward, there is every reason to believe that a vibrant mix of uses supporting the aims of the SIL could and should be achieved.

LP34 Managing Land for Industry and Distribution

The land identified in Figure 2 should be identified as being suitable for mixed use economic led development, including a wide range of employment related uses including industry, storage and

distribution, sui generis uses, workshops, offices and studios falling in use classes B8, B2, Class E (g) and sui generis use.

Priority should be given to economic land uses but in order to fully optimise development of the land, residential uses in the airspace above these economic uses should be supported where this is consistent with the maintenance and enhancement of the primary economic use.

It is clear that the northern part of Stewart's Road and Linford Street enjoy similar levels of accessibility to the proposed BDTQ and border residential uses of the Patmore Estate. The area comprises a range of different types of employment including showrooms, warehousing, the food industry and brewing and offices and workshops. The mix of uses is both appropriate and should be maintained going forward. It provides a supply of small-scale office and workshop premises formerly in class B1 and now in class e (g) which are both appropriate and for which there is significant demand. This has been informed by discussions with local commercial agents who are familiar with the area advice from which has been input to the masterplan proposals. While these proposals would be the subject of stakeholder engagement going forward, there is every reason to believe that a vibrant mix of uses supporting the aims of the SIL could and should be achieved.

The approach is consistent with the principles of LP37 which seek to ensure the provision of modern, flexible economic space designed to meet the needs of a vibrant range of businesses without compromise to their ability to continue operating 24hrs and in the long term. Indeed, the redevelopment of some of the traditional employment areas is essential in meeting future needs in this manner.

The Local Plan supports the intensification of industrial uses in both the borough's SILs and LSIA's in order to meet identified demand. It notes this could be realised through the introduction of smaller units; the development of multi-storey schemes; the addition of basements; and the more efficient use of land through higher plot ratios, although this must also ensure that sufficient yard space is retained to meet operational requirements and that any negative impacts on the transportation network are appropriately mitigated. The Plan supports the most efficient use of sites through a masterplan. This can achieve efficiencies in particular in relation to access and servicing arrangements

While Policy LP34 restricts development in SIL and LSIA's to industrial uses because of the adverse impact other development might have on the capacity and capability of those sites to meet these needs, this is not always likely to be the case. It is clear from the initial stages of the masterplanning process undertaken thus far for Linford Street, that it is possible to enhance the quantum and quality of industrial space within the area and provide for complimentary mixed-use development. This is shown in the option set out in the accompanying CGL Vision document. Given the containment of the area by roads and railway lines, this would have no adverse impact on the function of the SIL outside of the area identified.

LP35 Mixed Use Development on Employment Land

For the reasons stated in respect of LP34 and the proposed Site-Specific Allocation set out earlier in this submission, we consider that the area outlined in blue on Figure 2 be identified as being suitable for mixed use development under policy LP35 as either a Economic Use Protection Areas (EUPA) or Economic Use Intensification Areas (EUIA). Given that the principle of these submissions is the re-provision and increase in the quantum and quality of economic space as a requirement, they are entirely consistent with the principle of EUIAs which are to promote investment in modern industrial premises provide business

floorspace for SMEs to support the borough's economy and deliver residential uses to meet the borough's housing needs. The designation requires that proposals provide intensified industrial uses and increased business floorspace and/or open workspace for SME businesses. Residential uses will only be appropriate where they assist in developing more intensive economic uses and are compatible with those uses and the spatial objectives set out in the relevant Area Strategy and/or Site Allocation.

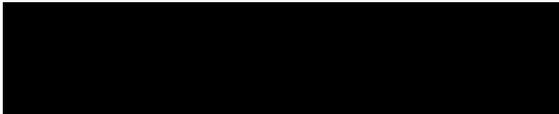
LP37 Requirements for New Economic Development

While we support the overall aim of Policy LP37, we consider that this principle can be applied successfully under the preceding policies to ensure that in mixed-use developments, including those that incorporate some residential use, the design and layout of the development can ensure that the proposed uses can successfully co-exist, having had regard to the amenity of future residents and the operational requirements of existing and future businesses.

Conclusion

These representations are intended and submitted in a positive light to help meet the future needs of the Borough in a manner that is both sustainable and maintains the fundamental objectives of the local plan review. We would wish to enter a dialogue with the Council in order to consider the ideas raised and discuss a way forward for the sites identified.

Yours sincerely



Steven Fidgett
Director



Mr Steven Fidgett
Union 4 Planning

Our Ref: AL/KP/26305
28 February 2022

10 Stoney Street
London SE1 9AD
T 020 3757 7777
F 020 7222 0558

team@unionstreetpartners.co.uk
www.unionstreetpartners.co.uk

Dear Steven,

LINFORD STREET / STEWARTS ROAD, LONDON, SW8

Following receipt of Child Graddon Lewis' (CGL) proposed option for the above proposed development site, we, as a local commercial experts have pleasure in giving our opinion on the commercial viability of the scheme and the proposed mix of uses.

In order to give some background to our knowledge of the immediate area surrounding Linford Street/Stewarts Road, we originally sold 44 Linford Street to the current owners back in 1997 and have for the past 25 years been the most active commercial agent in this area. We have been involved with the letting and sale of 37 Linford Street, the letting of 33 Linford Street, the letting of 17-23 Linford Street, the letting and sale of 15 Linford Street and the letting and sale of 64-68 Stewarts Road.

From the masterplan option provided by CGL, the majority of the proposed residential accommodation sits at the south end of the site, whilst the main industrial/warehouse units are located to the north. The large industrial units are arranged over two storeys without residential above and in our view are best separated away from the residential due to issues with large trucks etc close to residential cores. The plans provided show commercial units on the ground floor on the southern part of the area and these could possibly be arranged over the first floor too, as we believe these units would be more likely to attract research and development companies, studios, SME offices, artists studios and workshops etc. These type of occupiers typically use lighter vans to service London and not HGVs.

From an employment perspective, it is envisaged that by creating a number of studios/R&D/office areas, this would significantly increase the employment generating scope of the site from its current arrangement. The increase in likely footfall/persons employed is likely to lead to a greater demand for commercial premises including retail facilities, which could also be incorporated within any proposed scheme. We are aware of significant demand for a mix of space of the type proposed.

Yours sincerely,

ALEXANDER LEWIS

On Behalf of: UNION STREET PARTNERS



Linford Street Vision

—
Child Graddon Lewis

—
February 2022

Linford Street Vision



The Vision

The transformation of an inefficient industrial and storage site to become a stronger economic hub driven by the intensification of employment uses through the creation of modern industrial space, workspace and mixed-use.



Stewarts Road Looking South

- 1 Increase in Industrial Commercial Floor Space – Improve Access and Serviceability
- 2 Create a variety of workspace unit types for businesses to service Central London
- 3 Create a better external environment for the employees
- 4 Create a positive living working environment
- 5 Create a variety of residential uses
- 6 Significant Public Realm improvements to Stewarts Road to benefit the Patmore Estate



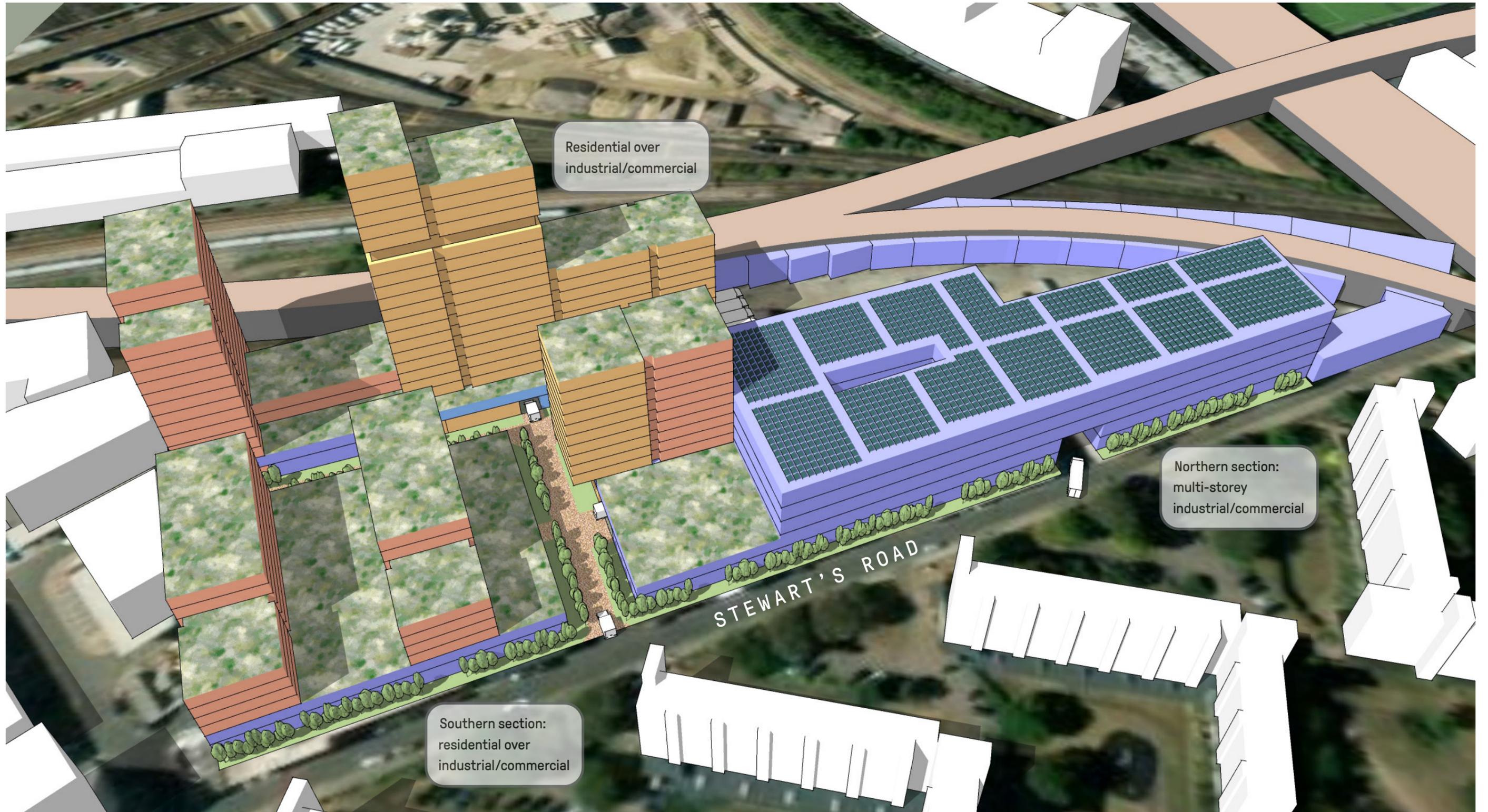
The Site



Existing Site



Vision Proposals



Vision Proposals

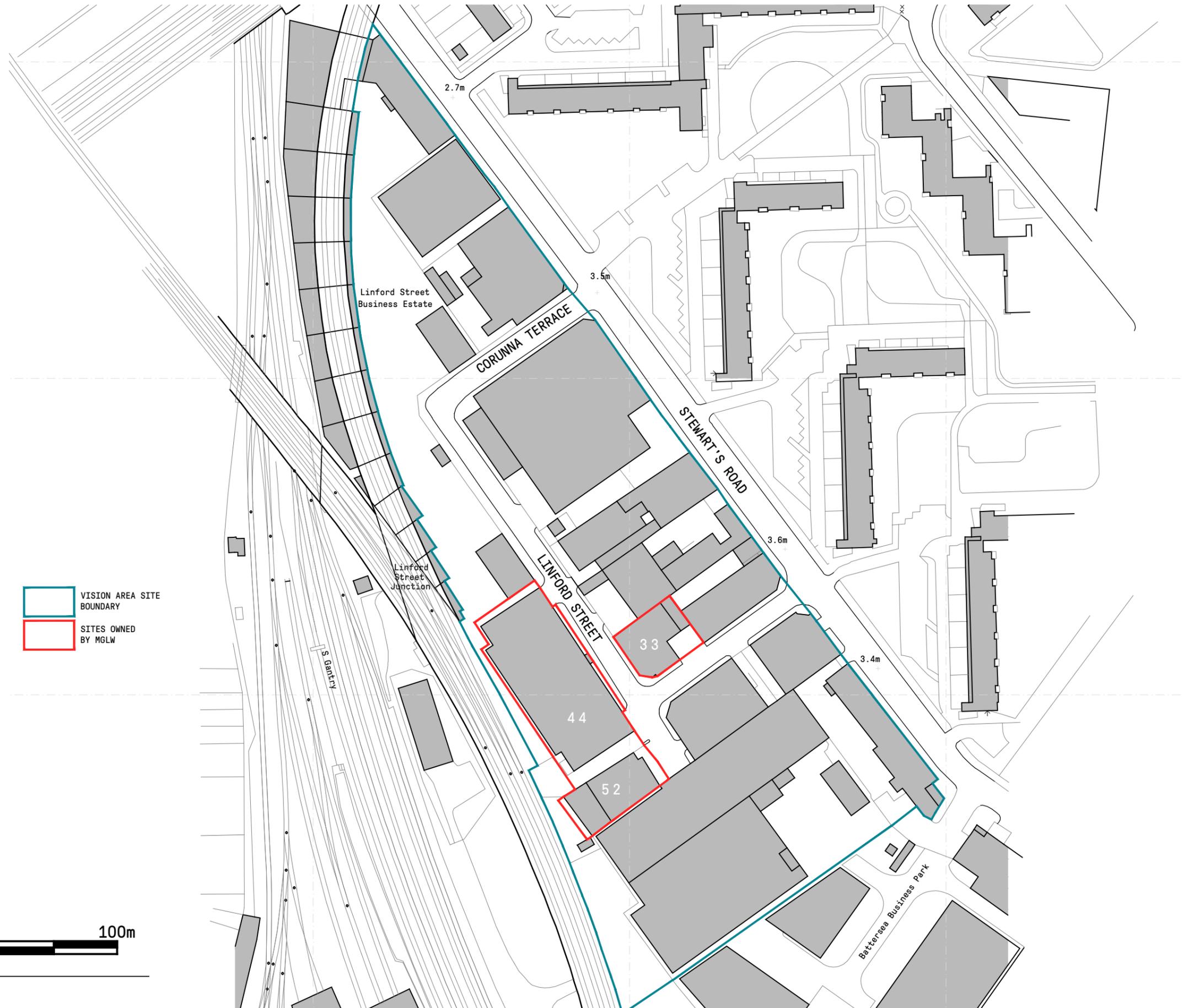


Southern section:
residential over
industrial/commercial

Northern section:
multi-storey
industrial/commercial



Existing Ground Floor



VISION AREA SITE BOUNDARY
SITES OWNED BY MGLW

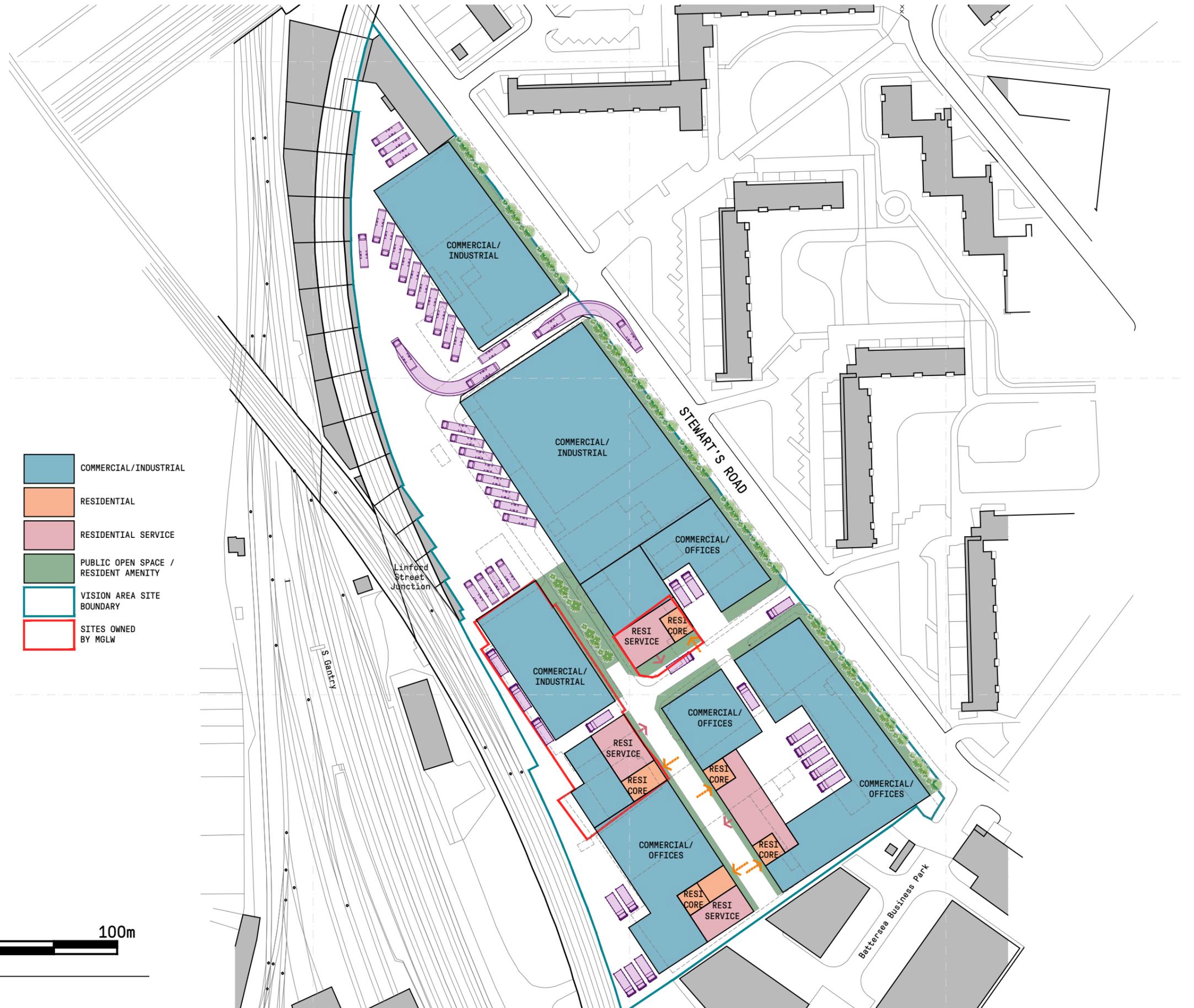


0 10 20 30 50 100m
Scale 1:1250



MGLW
Marble Granite Limestone Warehouse

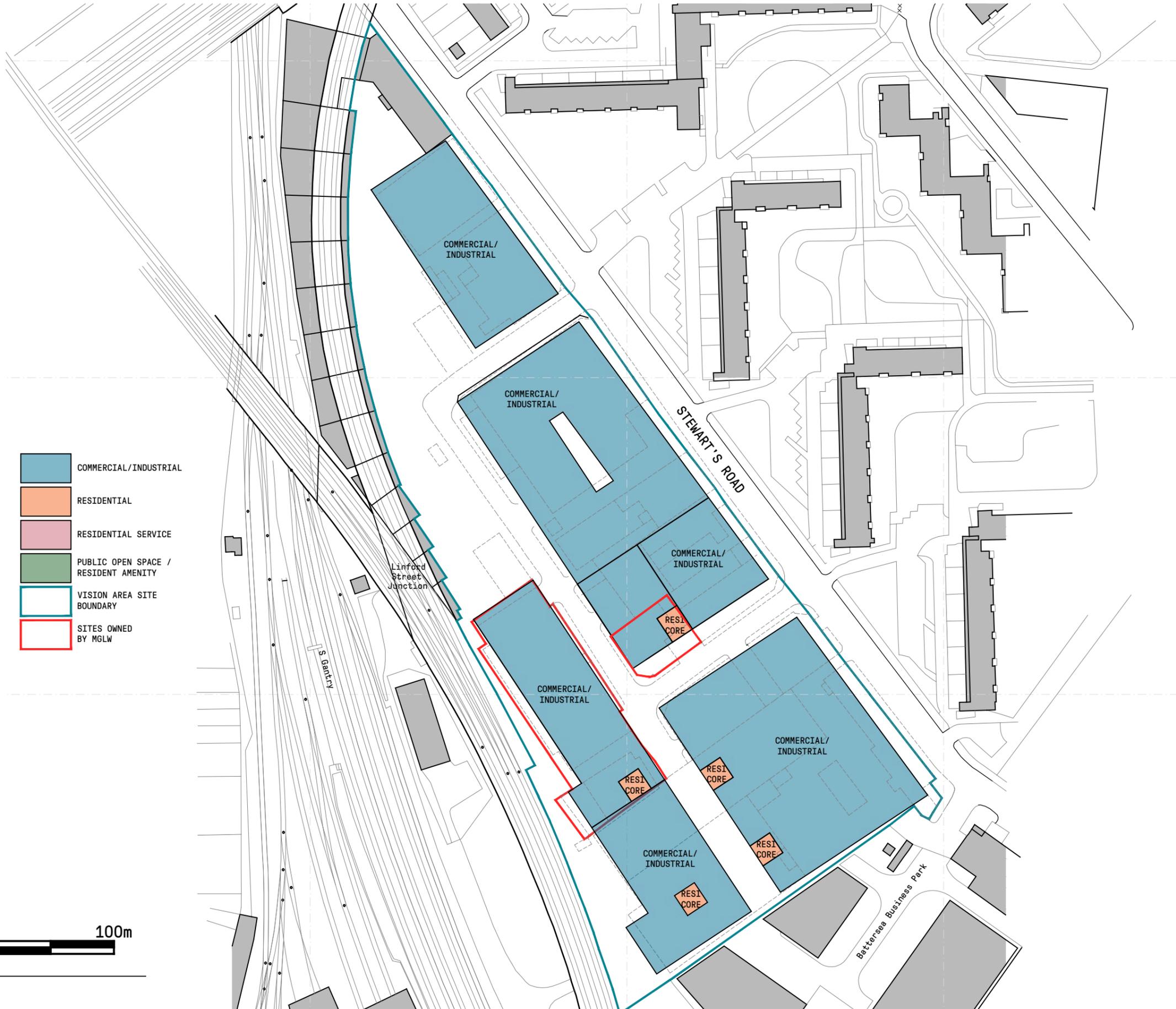
Proposed Ground Floor



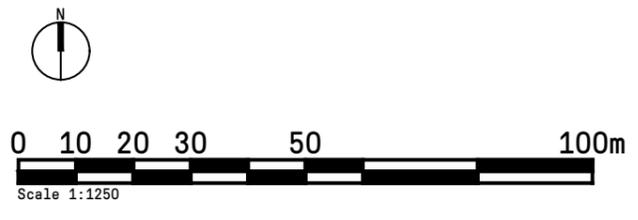
- COMMERCIAL/INDUSTRIAL
- RESIDENTIAL
- RESIDENTIAL SERVICE
- PUBLIC OPEN SPACE / RESIDENT AMENITY
- VISION AREA SITE BOUNDARY
- SITES OWNED BY MGLW



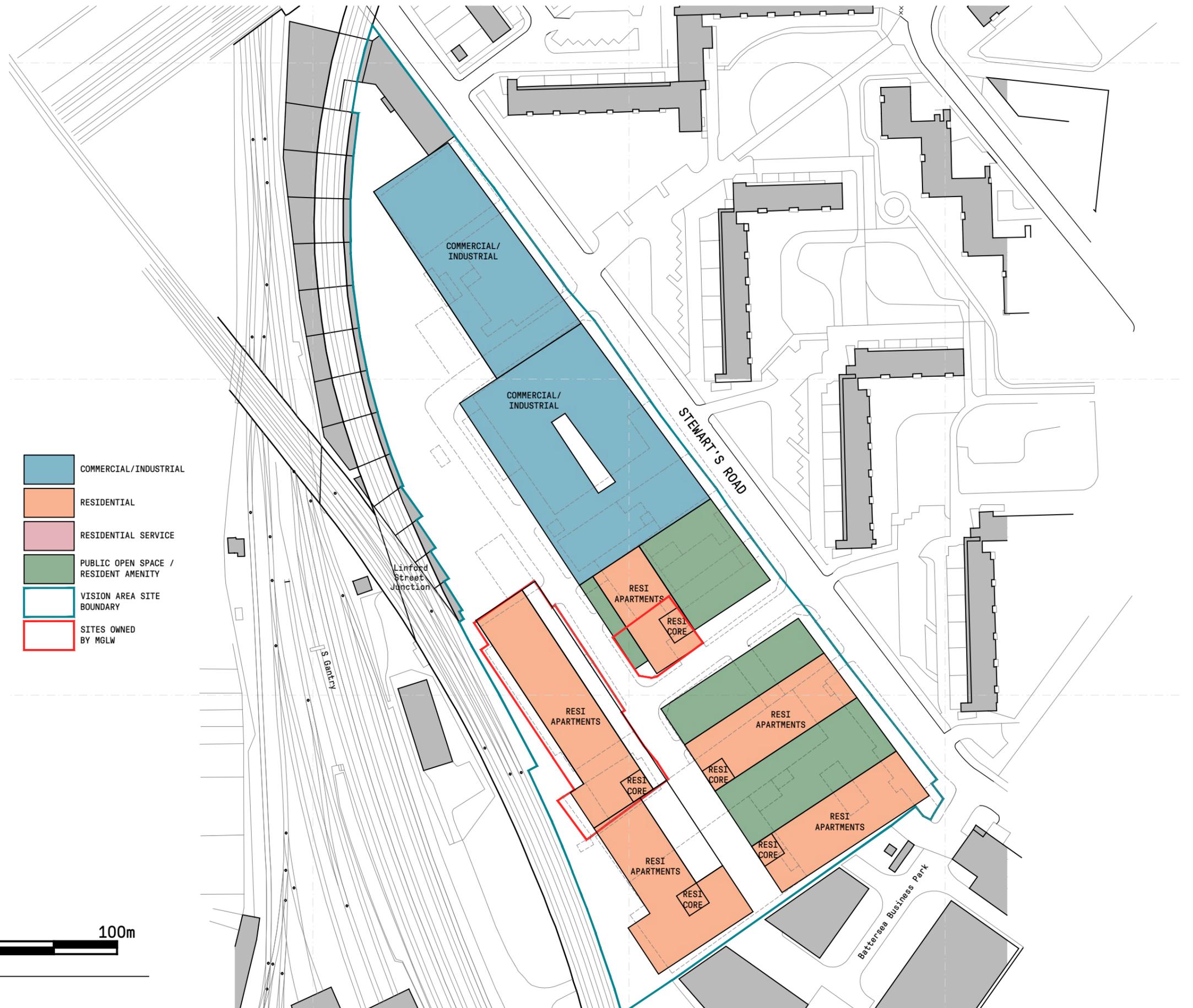
Proposed First Floor



- COMMERCIAL/ INDUSTRIAL
- RESIDENTIAL
- RESIDENTIAL SERVICE
- PUBLIC OPEN SPACE / RESIDENT AMENITY
- VISION AREA SITE BOUNDARY
- SITES OWNED BY MGLW



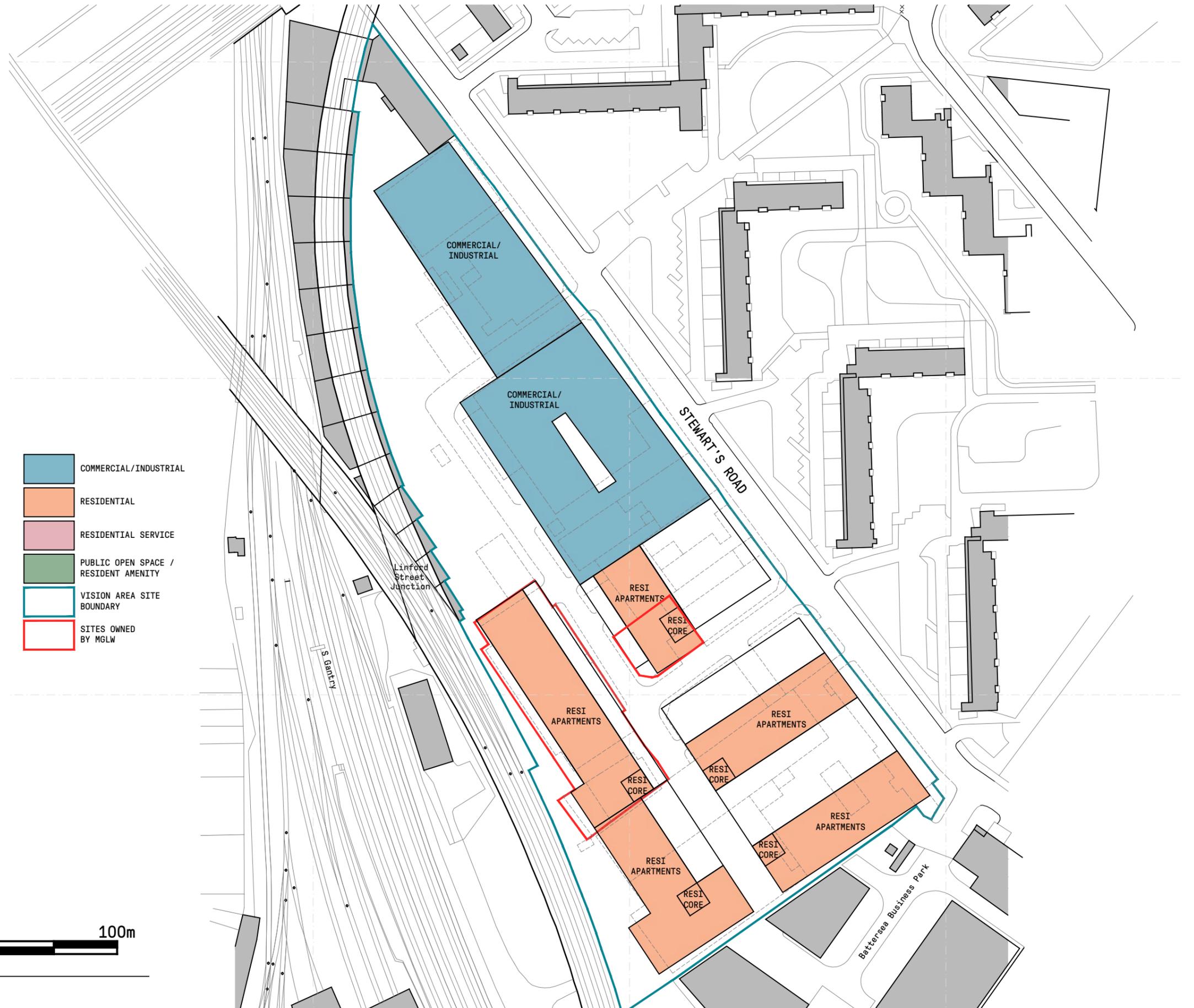
Proposed Second Floor



- COMMERCIAL/ INDUSTRIAL
- RESIDENTIAL
- RESIDENTIAL SERVICE
- PUBLIC OPEN SPACE / RESIDENT AMENITY
- VISION AREA SITE BOUNDARY
- SITES OWNED BY MGLW



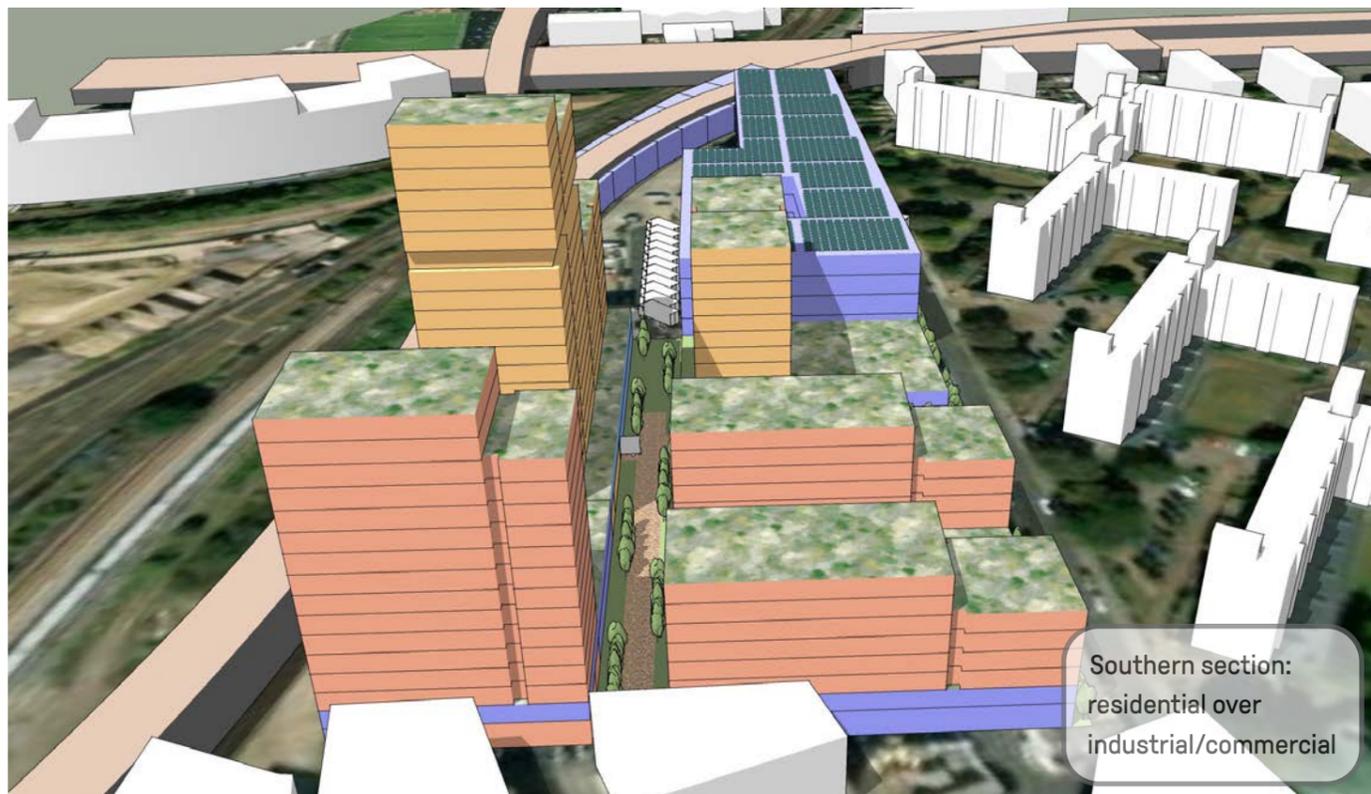
Proposed Third Floor



- COMMERCIAL/ INDUSTRIAL
- RESIDENTIAL
- RESIDENTIAL SERVICE
- PUBLIC OPEN SPACE / RESIDENT AMENITY
- VISION AREA SITE BOUNDARY
- SITES OWNED BY MGLW



Area Summary



(TOTAL SITE) Industrial / Commercial

| | | | |
|--------------|------------------------|-----------------------|------------------|
| Ground Floor | Estimated Existing GEA | 11,124 m ² | 101% of Existing |
| | Proposed GEA | 11,214 m ² | |
| Upper Floors | Estimated Existing GEA | 7,559 m ² | 387% of Existing |
| | Proposed GEA | 29,241 m ² | |
| TOTAL | Estimated Existing GEA | 18,683 m ² | 217% of Existing |
| | Proposed GEA | 40,455 m ² | |

(TOTAL SITE) Residential

| Unit | Number | Mix |
|--------------|------------|-------------|
| Studio | 44 | 9% |
| 1 Bed | 134 | 26% |
| 2 Bed | 272 | 54% |
| 3 Bed | 43 | 8% |
| 4 Bed | 15 | 3% |
| TOTAL | 506 | 100% |

| | |
|-------------------------|-----------------------|
| Total Residential GIA | 41,725 m ² |
| Units/Hectare | 215 |
| Habitable Rooms/Hectare | 604 |

(CLIENT'S SITE) Industrial / Commercial

| | | |
|--------------|---------------------|----------------------------|
| Ground Floor | Proposed GEA | 1,342 m ² |
| Upper Floors | Proposed GEA | 1,989 m ² |
| TOTAL | Proposed GEA | 3,331 m² |

(CLIENT'S SITE) Residential

| Unit | Number | Mix |
|--------------|------------|-------------|
| Studio | 22 | 9% |
| 1 Bed | 66 | 26% |
| 2 Bed | 134 | 54% |
| 3 Bed | 21 | 8% |
| 4 Bed | 7 | 3% |
| TOTAL | 250 | 100% |

| | |
|-----------------------|-----------------------|
| Total Residential GIA | 20,568 m ² |
|-----------------------|-----------------------|



Precedents

Multi-storey Industrial - Northern Section



Precedents

Industrial with Residential - Southern Section



Precedents

Industrial with Residential - Southern Section



Residential co-existing with industrial/commercial lower floors



Rooftop amenity spaces creating desirable residential outlook



Child
Graddon
Lewis

Irongate House
30 Dukes Place
London
EC3A 7LP

+44 (0) 20 7539 1200
cgluk.com
hq@cgluk.com
@cgluk