

Wandsworth Local Plan  
Employment and Industry Document  
Soundness Self-Assessment Checklist  
October 2017



# Employment and Industry Policies: Soundness Self-Assessment Checklist (October 2017)

*This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.*

**In summary – the key requirements of plan preparation are:**

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

## **The Tests of Soundness at Examination**

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’”, namely that it is:

### **1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements**

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

### **2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence**

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This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

### **3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities**

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

### **4. Consistent with national policy: enabling the delivery of sustainable development**

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy [www.planningportal.gov.uk](http://www.planningportal.gov.uk)). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

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In addition, the Legal Compliance checklist (a separate document, see [www.pas.gov.uk](http://www.pas.gov.uk)) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>• Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>• Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>• The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery.</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing</li> </ul>	<p>The Employment and industry review is only a partial review of the Adopted Local Plan. As mentioned in the Inspector’s report on the Local Plan 2016, this stated that the council intends to undertake a review of employment and industrial land requirements and associated site allocations (as these policies were not reviewed in the previous Local Plan), which will be in advance of a full-scale, wider review of the Local Plan. The new employment and industry local plan document will replace the relevant policies and site allocations in the adopted plan, but it will need to fit with the adopted spatial vision and strategic objectives for the borough that are set out in the Core Strategy March 2016. The adopted Core Strategy Strategic objectives will last for the lifetime of the Plan which is until 2030.</p> <p>The Local Plan contains a clear vision and objectives (Chapter 3) which are specific to the Borough. The objectives are linked to the challenges in the plan area.</p> <p>The Vision includes:</p> <ul style="list-style-type: none"> <li>• <i>A range of opportunities for local business activity, including start up and small enterprises, in mixed use developments;</i></li> <li>• <i>A strategic pool of key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea, continuing to provide opportunities for industry and warehousing which are better located outside residential areas, as well as new waste management facilities.</i></li> </ul> <p>The Employment and Industry policies will help achieve the Core</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>how they combine to provide a coherent policy structure.</p>	<p>Strategy Strategic Objective ‘Economic Objectives’ –</p> <ul style="list-style-type: none"> <li>• <i>Seek to maximise the employment potential of land in the borough by safeguarding land and buildings for business and industrial use and promoting development for employment purposes in appropriate locations including as part of mixed use development so as to increase job and business opportunities.</i></li> <li>• <i>Promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough.</i></li> <li>• <i>Increase the viability and vitality of the town centres and local centres, including the proposed centres at Battersea Power Station and Vauxhall, as the focus for shopping and for employment and leisure and other community activities.</i></li> </ul> <p>As the review is only a partial review of the Council’s Local Plan, the vision and objectives are not under review.</p> <p>The Local Plan Partial Review has gone through various internal Council approvals. All policies have been agreed corporately and the Council considers that there are no internal inconsistencies.</p> <p>Employment Land and Premises Study (2016) considers forecasts in economic and jobs growth. The GLA were consulted upon the growth scenarios and have agreed that this quantum of development proposed is acceptable.</p>

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		<p>Section 13 of the Adopted Local Plan sets out the implementation and delivery of the Plan. In essence, the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives.</p> <p>The majority of new development identified in the Plan's site allocations, particularly investments in new infrastructure, housing and jobs, will be delivered by the private sector. The Council has also updated and published an updated Infrastructure Delivery Plan (IDP) (2017), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.</p> <p>The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery.</p> <p>In addition, infrastructure providers, key agencies and other key partners have been involved.</p> <p>Ongoing monitoring of the Adopted Local Plan, for example through the Authority's Monitoring Report, and regular reviews of the IDP, will highlight if changes to the delivery timescales are required. The Local Plan is supported by a Monitoring Framework, which is being updated as set out in the in IIA.</p> <p>The second consultation on the Local Plan Partial review (Regulation 18), which took place from December 2015 until</p>

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		<p>January 2016, set out 'Why we are reviewing this policy area' and 'How we will get there', and these sections clearly identified the issues that the Council considered needed to be addressed.</p> <p>An Employment Land Study (AECOM) April 2016-July 2016 was undertaken followed by a Call for Sites in Jun 2016- September 2016. This then formulated the Policy Option Consultation which was issued in October 2016.</p> <p>Stakeholders have been consulted throughout the preparation of the Local Plan Partial Review, and the Consultation Reports and Duty to Cooperate report sets out how their comments have been taken into account; see the Statement of Consultation.</p> <p>Stage 2 of the Partial Review consisted of the Publication stage. A submission version was published in March 2017 and also a Regulation 19 submission version consultation.</p> <p>The Integrated Impact Assessment scoping report (October 2016) incorporates an SEA and SA and these show how different options were appraised. It also explains how different alternatives were examined and why the preferred policies were chosen.</p> <p>Given the issues the policy is seeking to address and the range of evidence, the submission policy strikes the most appropriate balance. The submission policy is internally consistent with other adopted policies in the Plan and will sit alongside them.</p> <p>The policy criteria set out in the submission document and the</p>

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		supporting reasoned justification explains how the policy objective will be met.
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> <li>• An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below).</li> <li>• An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at.</li> <li>• Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area)</li> </ul>	<p>The council produced a robust and detailed evidence base that supported the Adopted Local Plan and its spatial strategy.</p> <p>This partial review looks at replacing certain policies from the Core Strategy and Development Management policies and site allocations.</p> <p>The strategic approach set out in policy E11 supported by policies E12-9, provides a sustainable formula for encouraging economic growth in the borough, taking into account the future needs of the local and London economy, the spatial characteristics of Wandsworth’s economic geography, the opportunities presented by intensification of under-utilised sites, and the spatial vision and strategic objectives of the Local Plan and the London plan.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> <li>• A policy or policies which reflect the principles of the presumption in favour of sustainable development (see <a href="http://www.planningportal.gov.uk">model policy at www.planningportal.gov.uk</a>)</li> </ul>	<p>The Partial Review of the Local Plan has been created in accordance with the NPPF and therefore policies follow the approach of the presumption in favour for sustainable development. The Employment and Industry review of the Local Plan is based on the principles of sustainable development as demonstrated through the vision, strategic objectives and policies which seek sustainable solutions. A policy explicitly setting out the presumption in favour of sustainable development is no longer required.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The LPEID used growth projections as a broad indication of likely demand for economic uses for the lifetime of the plan, rather than identifying one particular growth projection as the most likely level of demand. The LPEID has taken a balanced approach to the re-designation of industrial land, seeking to: continue protecting a large proportion industrial land and re - designate areas where underutilisation of sites occurs. The LPEID approach will ensure that unproductive employment sites are not unduly protected, that investment is encouraged in industrial sites, that new industrial floorspace is created in appropriate locations and that industrial land that is well used and successful continues to be protected.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> <li>• Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs.</li> <li>• Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</li> </ul>	<p>The existing Local Plan is considered to be robust, up-to-date and in line with NPPF and London Plan. In addition, the evidence that supported the existing Plan is still up to date and sound, and since then only new evidence emerged in relation to employment/industrial land/uses, and that is the reason for the partial review.</p> <p>The LPEID does not contain policies relating to population forecasts. It focuses on the employment projections and relates to the locations of development suitable for employment and industrial uses and where suitable residential.</p> <p>The new employment and industry local plan document will replace the relevant policies and site allocations in the adopted plan, but it will need to fit with the adopted spatial vision and strategic objectives for the borough that are set out in the Core Strategy (2016).</p> <p>As part of this partial review preparation process, the Council</p>

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		<p>objectively assessed economic, social and environmental needs of the borough by compiling a comprehensive evidence base which is available on the examination web page <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>. Policy approaches have then been derived from these studies, such as E11 –E19.</p> <p>The partial review looks to encourage sustainable growth and a balanced approach needs to be taken, therefore, it seeks to protect established and thriving economic areas as well as promoting redevelopment of sites and premises that have the potential to intensify in order to better meet the needs of the local economy, provide housing, improve the quality and enjoyment of the public realm, and support a thriving cultural and natural character for the area. The strategic approach set out in policy E11, supported by policies E12-E19 , provides a sustainable formula for encouraging economic growth in the borough, taking into account the future needs of the local and London economy, the spatial characteristics of Wandsworth’s economic geography. This approach ensures that effective use of land is maximised.</p> <p>The council has carried out extensive consultations on the Plan and in particular an informal consultation was undertaken in 2015 to seek early feedback and input from Duty to Cooperate bodies as well as interested parties and groups on the scope of the review of existing policies within the Local Plan Employment and Industry Document. A separate Duty to Cooperate statement has been prepared which forms part of the submission examination library on the website along with the GLA letter of General Conformity, which forms part of the consultation responses.</p>

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		<p>The Council commissioned an Employment Land and Premises Study (ELPS) of the Borough which was published in August 2016. Available at; <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>. The ELPS assesses the quantity, quality and viability of the Borough's employment land to form an evidence base to support the review of LB Wandsworth's Local Plan. This also reviewed other London borough's evidence and local plan policies, and strategic-level evidence notably the Greater London Authority's (GLA) Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012) which also provides specific directions on employment provision requirements in London.</p> <p>The council has engaged with the GLA at all stages in particular regarding the evidence base and strategic overview and direction relating to employment growth scenarios and economic development matters. Particularly relevant to the development of the Plan was engagement on the strategic evidence base such as GLA growth forecasts, the London office market and Central Activities Zone (CAZ), and strategic industrial land. On-going engagement has also taken place with the GLA on waste allocations, protected waste sites and safeguarded wharves. These have been included in the Employment and Industry Document as they tend to be located in or adjacent to protected industrial or employment areas; however the Council's approach to reviewing these policy matters as part of a full review of the Local Plan is supported by the GLA and will be guided by an updated London Plan.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<b>NPPF Principles: Delivering sustainable development</b>		
<b>1. Building a strong, competitive economy (paras 18-22)</b>		
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<ul style="list-style-type: none"> <li>• Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate.</li> </ul>	<p>Wandsworth’s economic vision can be found within Chapter 4 of the Core Strategy and Chapters 4 and 5 of the DMPD. These documents should be considered in conjunction with the various Town Centre business plans and related initiatives. The spatial vision includes;  <i>‘A range of opportunities for local business activity, including start up and small enterprises, in mixed use developments;’</i>            A strategic pool of key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea, continuing to provide opportunities for industry and warehousing which are better located outside residential areas, as well as new waste management facilities.</p> <p>Changes in economic activity have affected the nature, location and size of employment in Wandsworth with a decline in traditional industry and growth in logistics, business services and creative industries.</p> <p>Evidence produced by the GLA which fed into the AECOM Employment and Land Study (2016) regarding employment projections state that there will be an increase in office jobs upto 14,900 jobs. This increase is predicted to be in the professional, scientific, technical and real estate sectors which tend to be office based.</p> <p>The Employment, Land and Premises Study, 2016 and other</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>evidence identifies that there is a specific need for flexible, affordable, serviced accommodation.</p> <p>Employment based in industrial premises will increase up to 11,400 jobs.</p> <p>The strategic reservoir for land for industry and waste will comprise the Queenstown Road, Battersea, and Summerstown Strategic Industrial Locations (SILs) supported by a number of Locally Significant Industrial Areas (LSIAs) in the Wandle Valley.</p> <p>The LEP were consulted on the strategy for the area.</p> <p>The Marine Management Organisation (MMO) are happy with the Councils economic strategy and approach on the LPEID.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> <li>• A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement.</li> <li>• An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)</li> </ul>	<p>To ensure the delivery of infrastructure in the Borough, the Council introduced its own CIL in 2012 and Development Infrastructure Funding Study for Vauxhall, Nine Elms and Battersea area. Aside from implementing projects identified on the Regulation 123 list, further contributions may be secured by planning/and or highway legal agreement(s) where works on site, or in the vicinity are necessary to mitigate the impact of development, or to enable the delivery of the site, as detailed in the Council's Planning Obligations Supplementary Planning Document.</p> <p>The following Adopted Core Strategy policies, which are not subject to review as part of this Plan, set out the strategic approach to meeting identified needs for community services and the provision of infrastructure in the Borough and environmental enhancement. They guide development to</p>

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		<p>specific areas and set out the type of development that the Council would find acceptable in those areas:</p> <ul style="list-style-type: none"> <li>• PL9 – River Thames and the riverside</li> <li>• PL10 – The Wandle Valley</li> <li>• PL11 – Nine Elms and the adjoining area in north-east Battersea</li> <li>• IS6 – Community services and the provision of infrastructure</li> <li>• IS4 – Protecting and enhancing environmental quality</li> </ul> <p>More specifically, the following proposed policies in the partial review replace adopted Core Strategy and DMPD policies and help identify where and how the Council will protect and promote particular areas and particular economic sectors:</p> <ul style="list-style-type: none"> <li>• Policy EI 1 Encouraging sustainable economic growth</li> <li>• Policy EI 2 Locations for new employment floorspace</li> <li>• Policy EI 3 Protected employment land and premises</li> <li>• Policy EI 4 Affordable, flexible and managed workplaces</li> <li>• Policy EI 5 Requirements for new employment development</li> <li>• Policy EI 6 Managing land for industry and distribution</li> <li>• Policy EI 7 Redundancy of employment premises</li> <li>• Policy EI 8 Waste</li> <li>• Policy EI 9 Protected wharves</li> </ul> <p>It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies</p>

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		<p>Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA. It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics.</p> <p>The Core Strategy and the DMPD is supported by the SSAD. Together these documents comprise the Local Plan. The SSAD sets out the main sites where development or other change is anticipated in the Borough, where the Council has particular objectives or is supporting or promoting specific site proposals. This includes sites for employment, economic or waste purposes which have been allocated at the following locations through the LPEID:</p> <p>Causeway Island including land to the east Hunts Trucks, adjoining sites including Gasholder, Armoury Way</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Keltbray Site, Wentworth House &amp; adjacent land at Dormay Street</p> <p>Frogmore Depot</p> <p>Panorama Antennas</p> <p>Ferrier Street</p> <p>92 Putney Bridge Road (HSS Hire)</p> <p>Wandsworth Riverside Quarter, Point Pleasant</p> <p>9, 11 and 19 Osiers Road</p> <p>Linton Fuels site, Osiers Road</p> <p>Feather's Wharf, The Causeway</p> <p>Land at the Causeway</p> <p>Cory Environmental Materials Recycling Facility, Smugglers Way</p> <p>Western Riverside Waste Transfer Station</p> <p>Homebase, Swandon Way</p> <p>B&amp;Q, Smugglers Way</p> <p>McDonalds, Swandon Way</p> <p>Mercedes Benz and Bemco, Bridgend Road</p> <p>Wandsworth Bridge Roundabout</p> <p>Wandsworth Bus Garage, Jews Row</p> <p>Pier Wharf</p> <p>Chelsea Cars and KwikFit, Armoury Way</p> <p>Riverside Business Centre and former Bingo Hall, Bendon Valley</p> <p>These sites have been informed through a call for sites process and have been assessed for their deliverability and availability. The council have been working with TFL to remove the Wandsworth</p>

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		<p>gyratory which is currently located adjacent to the Ram Brewery site, Hunts Trucks, adjoining sites including Gasholder, Armoury Way and Chelsea Cars and KwikFit, Armoury Way. In addition, the Site Allocation Document and Core Strategy aim to provide pedestrian and cycle routes from the Thames Riverside to Wandsworth town centre, opening up the River Wandle. The Wandle Valley Regional Park Trust have been consulted throughout the process and are also working to improve the public realm.</p>
<p><b>2. Ensuring the vitality of town centres (paras 23-37)</b></p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> <li>The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>This topic area is not subject to review in the focussed LPEID and the adopted policies remain. However, the Economic Land Availability Assessment (ELAA) process undertaken by the council has identified a reasonable supply of land for offices in town centres, however the capacity falls short of the projected demand for new office floorspace, particularly for the local and sub-regional businesses that would not seek to locate in the emerging high specifications office market in Nine Elms. For this reason it is appropriate to seek new office floorspace in focal points as part of mixed use development, and this will add to the vitality and viability of the focal points. To supplement the potential for new office development in town centres, sites in good locations or on the edge of town centres have been given a site allocation to provide a mix of uses including new economic floorspace.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail,</p>	<ul style="list-style-type: none"> <li>An assessment of the need to expand (the) town centre(s), considering the</li> </ul>	<p>The existing Local Plan is considered to be robust, up-to-date and in line with NPPF and London Plan. In addition, the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<p>needs of town centre uses.</p> <ul style="list-style-type: none"> <li>Primary and secondary shopping frontages identified and allocated.</li> </ul>	<p>evidence that supported the existing Plan is still up to date and sound, and since then only new evidence emerged in relation to employment/industrial land/uses, and that is the reason for the partial review. Therefore, the assessment of the town centres was not reviewed as part of the LPEID. This has previously been established and set out in the adopted Core Strategy policy PL8 Town and Local Centres. To supplement the potential for new office development in town centres, office sites in good locations or on the edge of town centres have been given a site allocation within the local plan employment and industry document to provide a mix of uses including new economic floorspace. The boroughs five established town centres at Balham, Clapham junction, Putney and tooting and Wandsworth all contain substantial amounts of employment generating uses including offices and to a lesser extent industrial premises.</p>
<p><b>3. Supporting a prosperous rural economy (para 28)</b></p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> <li>Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities.</li> </ul>	<p>n/a</p>
<p><b>4. Promoting sustainable transport (paras 29-41)</b></p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in</p>	<ul style="list-style-type: none"> <li>Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the</li> </ul>	<p>The Adopted Core Strategy Policy PL3 – Transport sets out the Council’s strategic approach to transport infrastructure. This policy is not part of the review.</p> <p>Sustainable transport has been considered with regard to the</p>

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<p>favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are</p>	<p>facilities referred to in paragraph 31.</p> <ul style="list-style-type: none"> <li>• Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</li> <li>• A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision.</li> <li>• Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes.</li> <li>• If local (car parking) standards have been prepared, are they justified and necessary? (39)</li> <li>• Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan.</li> </ul>	<p>Wandle Delta spatial strategy which aims to provide routes and spaces that integrate well into the existing surrounding street network. New routes and accesses have been proposed to allow improvements to permeability through the area such as;</p> <p><b>Section 3.13 states;</b>  <b><i>'Proposed new routes and access</i></b></p> <ul style="list-style-type: none"> <li>• <i>A new connection under the railway viaduct to allow a new riverside walk on the west side of Bell Lane Creek to the Wandle Mouth that will provide the primary link southwards to the town centre.</i></li> <li>• <i>Sites affected – Linton Fuels and Frogmore Depot</i></li> <li>• <i>One new route running east-west from Osiers Road west to connect with Knightley Walk to connect up with the existing network.</i></li> <li>• <i>Sites affected – 9, 11 and 19 Osiers Road</i></li> <li>• <i>One new north-south route that will extend the proposed new north-south route from the Hunt Trucks/Gas Holder and adjoining land site, under the railway viaduct, to connect with Smugglers Way</i></li> <li>• <i>Site affected – Land at the Causeway (EDF Energy Switch House and Head House)</i></li> <li>• <i>One new east-west pedestrian/cycle link connecting Ferrier Street over Swandon Way to the Delta Park/Gas Holder site.</i></li> <li>• <i>Sites affected – Ferrier Street and Delta Park/Gas Holder site</i></li> <li>• <i>One new connection over Bell Lane Creek to connect the Island site with Dormay Street</i></li> <li>• <i>Sites affected – Causeway Island and Dormay Street</i></li> <li>• <i>One new connection over the river Wandle to connect</i></li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes</p>		<p><i>Dormay Street/the Causeway with Hunts Trucks site.</i></p> <ul style="list-style-type: none"> <li>• <i>Sites affected – Dormay Street and Hunts Trucks sites</i></li> <li>• <i>Two new connections through the B&amp;Q site connecting Swandon Way'</i></li> </ul> <p>Areas of intensification and office clusters have been identified within the LPEID. These sites are primarily under-utilised industrial, retail and leisure uses that have the capacity to provide substantial quantities of economic floorspace, both for office and industrial use.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p><b>5. Supporting high quality communications infrastructure (paras 42-46)</b></p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> <li>• Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44.</li> </ul>	<p>The Council supports the expansion of electronic communications networks including telecommunications and broadband through DMPD Policy DMS1 – General development principles – sustainable urban design and the quality of the environment. Furthermore, as part of the Local Plan review, significant amendments were made to DMPD Policy DMS9 – Telecommunications and its accompanying text. These DPDs are not subject to review.</p> <p>The Council will be working on forthcoming work on telecommunications and how this can be integrated throughout the borough.</p>
<p><b>6. Delivering a wide choice of high quality housing (paras 47-55)</b></p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure</p>	<ul style="list-style-type: none"> <li>• Identification of:             <ul style="list-style-type: none"> <li>a) five years or more supply of specific deliverable sites; plus the buffer as appropriate</li> </ul> </li> <li>• Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their</li> </ul>	<p>This partial review does not concentrate on delivering housing sites and the housing targets remain as in the adopted Local Plan. For context the results of the pan-London SHLAA, 2013 (which the Council contributed towards) saw an increase in the annual Borough housing target set by the GLA from 1,145 to 1,812. This change had to be reflected in the Adopted Local Plan</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>inclusion (48)</p> <ul style="list-style-type: none"> <li>• A SHLAA</li> </ul>	<p>in order that the Council complied with the latest regional planning policy guidance. Despite the increased target, the Council have identified a five year land supply, plus a 5% buffer. Historically Wandsworth has supplied sufficient housing over the target period, and as such deems the demonstration of a 5% buffer appropriate.</p> <p>Further details on the five year land supply and housing trajectory can be found in the Authority Monitoring Report 2015/16 – Housing Policy Performance: <a href="http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516">http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516</a>.</p> <p>The LPEID allows for redevelopment mixed use in certain sites ensuring that re provision of industrial and employment uses are carried forward. This helps contribute to the rolling 5 year housing stock.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> <li>• Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15</li> </ul>	<p>A list of sites was reviewed to see if they created additional residential. These sites were LSIA and not included in the SHLAA and therefore housing supply.</p> <p>For context the Council’s Housing Trajectory has identified a supply of developable sites for both:</p> <ul style="list-style-type: none"> <li>a) 6-10 years and</li> <li>b) 11-15 years</li> </ul> <p>Further details can be found in the As stated above details of the Council’s Housing Trajectory can be found in the Authority Monitoring Report 2015/16 – Housing Policy Performance:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> <li>• A housing trajectory</li> <li>• Monitoring of completions and permissions (47)</li> <li>• Updated and managed SHLAA. (47)</li> </ul>	<p><a href="http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516">http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516</a></p> <p>As stated above details of the Council’s Housing Trajectory can be found in the Authority Monitoring Report 2015/16 – Housing Policy Performance:</p> <p><a href="http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516">http://www.wandsworth.gov.uk/downloads/file/12537/housing_trajectory_and_summary_tables_201516</a>For the purposes of Wandsworth’s Authority Monitoring Report (AMR) and the GLA’s Annual Monitoring Report, the Council is obliged to monitor completions and permissions to demonstrate performance against GLA targets and meeting local housing needs.</p> <p>Also see the pan-London SHLAA, 2013 which Wandsworth Council contributed towards.</p> <p>The 2017 SHLAA draft figures have been released to Wandsworth on 27/09/2017. The draft London plan will contain the SHLAA figures and SHLAA report, but this is not currently publicly available.</p>
<p>Set out the authority’s approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> <li>• Policy on the density of development.</li> </ul>	<p>This topic is not the subject of the Local Plan Review. However, for clarity, the Councils approach to housing density is set out in the adopted Local Plan 2016. Core Strategy policy IS3 (Good quality design and townscape) and Development Management Plan Policy DMH4 (Residential development including conversions) . The Council considers these policies are still sound and robust.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> <li>• Policy on planning for a mix of housing (including self-build, and housing for older people)</li> <li>• SHMA</li> <li>• Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50)</li> <li>• Evidence for housing provision based on up to date, objectively assessed needs. (50)</li> <li>• Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50)</li> </ul>	<p>This is not part of the Local Plan review but for clarity the adopted policy PL5: 'Provision of new homes' seeks to meet the full objectively assessed needs for housing and Policy IS5: 'Achieving a mix of housing including affordable housing' looks to identify the range of housing.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> <li>• Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs.</li> <li>• Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53)</li> <li>• Examples of special circumstances to allow new isolated homes listed at para 55.</li> </ul>	<p>N/A</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>7. Requiring good design (paras 56-68)</b></p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> <li>• Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues</li> </ul>	<p>Adopted Core Strategy Policy IS3 – <b>Good quality design and townscape</b> clearly states the quality of development expected by the Council. In accordance with para 58 and the approaches in paragraphs 59-61 of the NPPF, the policy covers issues including character and heritage, layout, form and design, scale and density and tall buildings and views.</p> <p>DMDPD policy DMS1 – General development principles – sustainable urban design and the quality of the environment also lists criteria to support the implementation of quality development in the borough.</p> <p>The partial review looks to ensure good design through:</p> <ul style="list-style-type: none"> <li>• Policy E15: <i>‘Requirements for new employment development’</i>.</li> <li>• <i>Area spatial strategy for the Wandle Delta</i></li> <li>• <i>Site allocations</i></li> </ul>
<p><b>8. Promoting healthy communities (paras 69-77)</b></p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies on inclusive communities.</li> <li>• Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use</li> </ul>	<p>Whilst there are no explicit policies on this within the LPEID the Local Plan policies have been produced taking account of the issue to promote healthy communities. Mixed use development is a key element for delivering growth within Wandsworth. In accordance with paragraph 69 of the NPPF mixed use developments are promoted through the following proposed policies:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>EI1 – Encouraging sustainable economic growth  This policy aims to encourage opportunities for affordable workspace and place making benefits of the cultural sector will be supported.  EI5 – Requirements for new employment floorspace</p> <p>The adopted policies still apply to ensure that any new development positively and proactively encourages well designed out places to live and work.</p> <p>PL8 – Town and local centres  PL9 – River Thames and the riverside  PL11 – Nine Elms and the adjoining area in north-east Battersea  PL12 – Central Wandsworth and the Wandle Delta  PL13 – Clapham Junction and the adjoining area  DMS1 – General development principles – Sustainable urban design and the quality of the environment  DMO8 – Focal points of activity</p> <p>DMPD Policy DMS1 – General development principles – Sustainable urban design and the quality of the environment also includes guidance to ensure that developments are designed to provide a safe and inclusive environment which maximises personal safety and minimises opportunities for crime and antisocial behaviour including terrorist activities. The DMPD policies that promote mixed use development include:</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• DMO8 – Focal Points of Activity</li> </ul> <p>More specifically the SSAD deals with these issues on a site by site basis.</p> <p>The IIA integrates Health Impact Assessment and includes health – related objectives which the policies of the LPEID were tested against.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> <li>• Inclusion of a policy or policies addressing community facilities and local service.</li> <li>• Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</li> </ul>	<p>The plan review positively considers NPPF paragraph 70 by planning for community uses via the approach set out in Policies EI3 and EI7. This states that once it has been established that there is no demand for a premise to continue in economic use, the premises should be used in a way that makes the greatest contribution to the wider needs of the borough. Community and cultural facilities will be prioritised, given the positive benefits such uses can bring to the local community.</p> <p>The adopted Local Plan considers community uses and in response to consultation representations, the Council has planned positively for the provision and use of shared space, community facilities and other local services. Strategic policies which address these issues in the Core Strategy include:</p> <ul style="list-style-type: none"> <li>• IS1 – Sustainable Development</li> <li>• IS5 – Achieving a mix of housing including affordable housing</li> <li>• IS6 – Community services and the provision of infrastructure</li> <li>• PL11 – Nine Elms and the adjoining area in north-east Battersea</li> <li>• PL15 – Roehampton</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> <li>• In the DMPD policies on this issue include:</li> <li>• DMH9 – Hostels, staff and shared accommodation (including student housing), specialist and supported housing</li> <li>• DMC1 – Protection of exiting community facilities</li> <li>• DMC2 – Provision of new and improved community facilities</li> <li>• DMC3 – Provision of Health and Emergency Service Facilities</li> </ul> <p>The adopted SSAD states that the CIL will be used to contribute towards the provision of strategic infrastructure as identified in the Council’s Regulation 123 list. Further contributions necessary to mitigate the impact of development, or to enable the delivery of the site is detailed in the Council’s Planning Obligations Supplementary Planning Document. It should be noted that an update of the Planning Obligations SPD was adopted on 5 March 2015.</p> <p><a href="http://www.wandsworth.gov.uk/cil">www.wandsworth.gov.uk/cil</a></p> <p><a href="http://www.wandsworth.gov.uk/downloads/file/10474/planning_obligations_spd_adopted_march_2015">http://www.wandsworth.gov.uk/downloads/file/10474/planning_obligations_spd_adopted_march_2015</a></p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> <li>• Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73)</li> <li>• A policy protecting existing open space, sports and recreational buildings and</li> </ul>	<p>This topic did not form part of the Local Plan review. However, for clarity, the evidence for open space need in the Borough is up to date and reflected in the policies contained in the Core Strategy, DMPD and SSAD.</p> <p>Core Strategy policies which accord with the guidance set out in paragraph 74 of the NPPF include:</p>

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	<p>land from development, with specific exceptions. (74)</p> <ul style="list-style-type: none"> <li>• Protection and enhancement of rights of way and access. (75)</li> </ul>	<ul style="list-style-type: none"> <li>• IS6 – Community services and the provision of infrastructure</li> <li>• PL1 – Attractive and distinctive neighbourhoods and regeneration initiatives</li> </ul>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> <li>• Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)</li> </ul>	<p>This topic was not part of the partial review and Wandsworth does not have a neighbourhood plan.</p> <p>In accordance with paragraphs 77 and 78 of the NPPF, the Core Strategy policies which protect open spaces include:</p> <ul style="list-style-type: none"> <li>• IS2 - Sustainable design, low carbon development and renewable energy</li> <li>• PL4 - Open space and the natural environment</li> <li>• PL9 – River Thames and the riverside</li> <li>• PL10 – The Wandle Valley</li> </ul> <p>DMPD polices which protect open spaces include:</p> <ul style="list-style-type: none"> <li>• DMS1 – General development principles – Sustainable urban design and the quality of the environment</li> <li>• DMO1 – Protection and enhancement of open spaces</li> <li>• DMO2 – Playing fields and pitches, sport, play and informal recreation</li> </ul>
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport</p>	<ul style="list-style-type: none"> <li>• Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> <li>○ Enhance the beneficial use of the Green Belt. (81)</li> <li>○ Accord with criteria on boundary</li> </ul> </li> </ul>	<p>The approach to the protection of open space is contained in the Adopted Local Plan.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<p>setting, and the need for clarity on the status of safeguarded land, in particular. (85)</p> <ul style="list-style-type: none"> <li>○ Specify that inappropriate development should not be approved except in very special circumstances. (87)</li> <li>○ Specify the exceptions to inappropriate development (89-90)</li> <li>○ Identify where very special circumstances might apply to renewable energy development. (91)</li> </ul>	
<p><b>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</b></p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> <li>• Planning of new development in locations and ways which reduce greenhouse gas emissions.</li> <li>• Support for energy efficiency improvements to existing building.</li> <li>• Local requirements for a building's sustainability which are consistent with the Government's zero carbon buildings</li> </ul>	<p>The topics of flooding, sustainable design and low carbon energy were agreed and adopted in the Core Strategy. Please see for further details;  <a href="http://www.wandsworth.gov.uk/downloads/file/10489/lpr109-soundness-self-assessment-checklist-2015">http://www.wandsworth.gov.uk/downloads/file/10489/lpr109-soundness-self-assessment-checklist-2015</a></p> <p>An SFRA was updated in 2016 which was used in the</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	policy. (95))	preparation of sequentially testing the proposed sites of the LPEID. Of the proposed employment sites, 22 sites fall within Flood zones 1-3 however, the Environment Agency has been consulted (as set out in the Duty to Cooperate Statement) and the EA supports the approach of the Employment and Industry Document. Flooding policies will be reviewed separately in the future full review of the Local Plan. The existing flood risk policies of the adopted Local Plan 2016 (Policies DMS 5, 6, 7 and PL2) will continue to be used for flood risk assessment. These Policies include support for the implementation of the TE2100 Plan. Any development will be assessed against the current adopted policy framework.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)	<ul style="list-style-type: none"> <li>• A strategy and policies to promote and maximise energy from renewable and low carbon sources,</li> <li>• Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</li> <li>• Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97)</li> </ul>	<p>This is not part of the partial review.</p> <p>For context the Council has a positive strategy to promote and maximise energy from renewable and low carbon sources which is set out in Core Strategy Policy IS2 – Sustainable design and low carbon energy. The policies are in line with the London Plan 2016.</p> <p>Guidance on the implementation of this strategy is set out in DMPD Policy DMS3 – Sustainable design and low carbon energy.</p>
Minimise vulnerability to climate	<ul style="list-style-type: none"> <li>• Account taken of the impacts of climate</li> </ul>	The policy approach to the topic of flooding is contained in the

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
change and manage the risk of flooding (99)	<p>change. (99)</p> <ul style="list-style-type: none"> <li>• Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100)</li> <li>• Policies to manage risk, from a range of impacts, through suitable adaptation measures</li> </ul>	<p>Adopted Local Plan. In order to conform with paragraphs 99 and 100 of the NPPF, minimise the Borough’s vulnerability to climate change and manage the risk of flooding, the Council has included policies in its Core Strategy and DMPD to guide development. These are as follows:</p> <p><b>Core Strategy</b></p> <ul style="list-style-type: none"> <li>• IS1 – Sustainable Development</li> <li>• IS2 – Sustainable design, low carbon development and renewable energy                             <ul style="list-style-type: none"> <li>• PL2 – Flood Risk</li> </ul> </li> </ul> <p><b>DMPD</b></p> <ul style="list-style-type: none"> <li>• DMS3 – Sustainable design and low carbon energy</li> <li>• DMS5 – Flood risk management                             <ul style="list-style-type: none"> <li>• DMS6 – Sustainable Drainage Systems</li> <li>• DMS7 – Consultation with the Environment Agency.</li> </ul> </li> </ul>
Take account of marine planning (105)	<ul style="list-style-type: none"> <li>• Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation</li> <li>• Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development</li> <li>• Integrate as appropriate marine policy objectives into emerging policy</li> </ul>	<p>The Marine Management Organisation (MMO) are happy with the Councils economic strategy and approach on the LPEID.</p> <p>The MMO are in the local plan database and had the opportunity to comment.</p>

## Employment and Industry Policies: Soundness Self-Assessment Checklist (October 2017)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	
Manage risk from coastal change (106)	<ul style="list-style-type: none"> <li>Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas.</li> <li>Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate.</li> </ul>	See above.
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>		
Protect valued landscapes (109)	<ul style="list-style-type: none"> <li>A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure.</li> <li>Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs.</li> </ul>	<p>This is not part of the LPEID.</p> <p>However, for clarity, the Council seeks to protect its open spaces. It also seeks to create, protect, manage and enhance networks of biodiversity and green infrastructure in accordance with paragraph 109 of the NPPF through the following Core Strategy policies:</p> <ul style="list-style-type: none"> <li>IS2 - Sustainable design, low carbon development and renewable energy</li> <li>PL4 - Open space and the natural environment</li> <li>PL9 – River Thames and the riverside               <ul style="list-style-type: none"> <li>PL10 – The Wandle Valley</li> </ul> </li> </ul> <p>DMPD polices which cover these issues include:</p> <ul style="list-style-type: none"> <li>DMS1 - General development principles – Sustainable urban</li> </ul>

## Employment and Industry Policies: Soundness Self-Assessment Checklist (October 2017)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>design and the quality of the environment</p> <ul style="list-style-type: none"> <li>• DMO1 – Protection and enhancement of open spaces</li> <li>• DMO2 – Playing fields and pitches, sport, play and informal recreation</li> <li>• DMO4 – Nature conservation</li> </ul> <p>The Borough’s designated green infrastructure is identified on the Policies Map.</p> <p>The LPEID Area spatial strategy for Wandle Delta sets out and identifies opportunities to improve biodiversity and places where the public realm should be improved.</p>
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> <li>• Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity.</li> </ul>	This topic was not the subject of the Local Plan review. However, for clarity, the Council’s requirements regarding pollution are set out in DMPD Policy DMS1 - General development principles – Sustainable urban design and the quality of the environment.
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> <li>• Identification and mapping of local ecological networks and geological conservation interests.</li> <li>• Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species</li> </ul>	The Council has collaborated with Natural England throughout the Employment and Industry Local Plan review and specifically on the content of the Scoping Report and Proposed Submission Integrated Impact Assessment (IIA). To ensure soundness and compliance with the Habitats Regulations, the Council wrote to Natural England in April 2017 seeking a formal opinion on whether Natural England considers that the 2015 HRA Report remains adequate, or whether a further HRA should be undertaken on the emerging Wandsworth Employment and Industry Local Plan. Natural England responded in in

## Employment and Industry Policies: Soundness Self-Assessment Checklist (October 2017)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>June 2017 confirming that ‘the short Habitats Regulations screening document supplied in support of this review provides an acceptable level of assessment in line with the fact that the local plan has been adopted recently and has its own full HRA in support of its allocations.’</p> <p>The LPEID Area spatial strategy for Wandle Delta sets out and identifies opportunities to improve biodiversity and places where the public realm should be improved.</p> <p>The Council seeks to create, protect, manage and enhance networks of biodiversity and green infrastructure. This includes geodiversity. The Council’s approach which accords with paragraph 117 of the NPPF is covered by the following Adopted Core Strategy and Development Management policies which are not part of the review:</p> <ul style="list-style-type: none"> <li>• IS2 - Sustainable design, low carbon development and renewable energy</li> <li>• PL4 - Open space and the natural environment</li> <li>• PL9 – River Thames and the riverside</li> <li>• PL10 – The Wandle Valley</li> </ul> <p>DMPD polices which cover these issues include:</p> <ul style="list-style-type: none"> <li>• DMS1 - General development principles – Sustainable urban design and the quality of the environment</li> <li>• DMO1 – Protection and enhancement of open spaces</li> <li>• DMO2 – Playing fields and pitches, sport, play and informal recreation</li> <li>• DMO4 – Nature conservation</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Borough's designated green infrastructure is identified on the Policies Map.</p> <p>The Borough does not have any geological conservation interests.</p>
<p><b>12. Conserving and enhancing the historic environment (paras 126-141)</b></p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> <li>• A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</li> <li>• A map/register of historic assets</li> <li>• A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126)</li> </ul>	<p>This policy area topic is not the subject of the Local Plan review. However, heritage assets are located in certain site allocations and Historic England have provided feedback regarding reference to Conservation Area Appraisals where appropriate and Archaeological Priority Areas which has been incorporated into the submission version.</p> <p>However, for clarity, the Council has adopted a positive strategy for the conservation and enjoyment of the historic environment and has a clear understanding of the heritage assets present in the Borough.</p> <p>The area spatial strategy for the Wandle Delta seeks to protect the historic interest of Listed buildings ensuring they are protected and enhanced by any future development.</p>
<p><b>13. Facilitating the sustainable use of minerals (paras 142-149)</b></p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals</p>	<p>This topic was not the subject of the Local Plan review and the Borough does not have sources of minerals or aggregates.</p> <p>The Council recognises that the evidence base relating to waste</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>policies is in the process of being updated in conjunction with the other Western Riverside Waste Authority (WRWA) Waste Planning Authorities (WPA). However this is not programmed to be finalised in time to inform the LPEID but will instead be produced for a proposed full review of the Local Plan. The borough's waste apportionment figure may also change in the review of the London Plan, as may the protection given to safeguarded wharves, however it is not yet apparent what this may be or what implications it may have. Overall it is considered that the adopted policies and allocations in the Local Plan relating to waste and safeguarded wharves remain up-to-date and sound; for clarity, however, the relevant policies will be transferred to the LPEID as they are included in the Core Strategy policies that relate to employment and industry and the chapter of the Development Management Policies Document (DMPD) for industry, employment and waste. This is addressed in policy EI8 and EI9 of the LPEID and the relevant supporting text.</p> <p>Nevertheless, certain sites have been safeguarded for industrial and/or manufacturing purposes that involve aggregates. Safeguarded wharves and transport nodes adjacent to these facilitate the sustainable use of minerals and aggregates. The safeguarded sites are identified in the SSAD and the Policies Map and comprise:</p> <ul style="list-style-type: none"> <li>• Site 2.1.7 – Kirtling Wharf, Nine Elms, SW8 and</li> <li>• Site 3.12 – Pier Wharf, SW18 – this site has been reallocated in the LPEID and safeguarded.</li> </ul>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Other sites which handle aggregates, such as concrete batching activities, are situated within the Council's designated Strategic Industrial Locations (SILs).
<p><b>Justified:</b> The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> <li>• Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>• The most appropriate strategy when considered against reasonable alternatives.</li> </ul>		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Consultation on the Borough's Local Plan review has allowed for effective engagement of all interested parties in accordance with the Council's commitments set out in the Statement of Community Involvement (SCI), 2012.</p> <p>In relation to 'hard to reach groups', the SCI recognises that some residents are often under-represented and hard to reach individually. Over the last few years, the Council has built up an extensive database of groups and individuals that are consulted on a regular basis on local plan making activities, and this includes 'hard to reach groups'. Over 1,000 consultation letters/e-mails were sent to individual and organisations to notify them of the consultation period and to let them know where to find further information and how to make representations. The database is extensive and includes a variety of residents' and local amenity groups and societies as well as groups such as Age activity centre, local youth groups, Wandsworth Mencap and Welcare in Wandsworth.</p> <p>Consultation that was undertaken includes; stage 1 public consultation in Dec2015/Jan 16, which a consultation report was</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>published.</p> <p>This was followed by a policy options consultation between 7 October and 4 November 2016. This second consultation set out a broad set of policy options and asked 67 questions about the policies and has been carried out in accordance with the Council’s Statement of Community Involvement. This was a non –statutory consultation, to complement the earlier Reg 18 consultation and explore the issues in further detail. This consultation report sets out the responses to each comment here <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>.</p> <p>Engagement under the Duty to Cooperate has taken place, as set out in the Duty to Cooperate report. The Consultation report on the Employment and Industry review – Regulation 19 preparation stage (policy options consultation) March 2017 sets out what consultation has been undertaken,</p> <p>The submission library contains all submitted evidence base documents.</p>

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<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> <li>• The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by.</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>• Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</li> </ul>	<p>The evidence base for this partial review of employment and industrial land consists of the following documents;</p> <ul style="list-style-type: none"> <li>• <a href="#">Employment Land and Premises Study (July 2016)</a> Aecom</li> <li>• <a href="#">Scoping Report (for Integrated Impact Assessment)</a> (March 2017)</li> <li>• <a href="#">Scoping Report consultation responses</a> (March 2017)</li> <li>• <a href="#">Flood Risk Sequential Test Report</a> (March 2017)</li> </ul> <p>Integrated Impact Assessment (2016), incorporating requirements of Strategic Environmental Assessment and Sustainability Appraisal - this tests a number of policy options to establish the most sustainable option –the conclusion informs the ultimate policy option selected to go forward.</p> <p>The demand forecasts in AECOMs ELPS are based on GLA Economics data, which in turn applies office and industrial floorspace projections based on existing sectors in the borough. The ranges set out in the forecasts give 3 different growth scenarios. To address these issues, the LPEID has used the growth projections as a broad indication of likely demand for economic uses for the lifetime of the plan, rather than identifying one particular growth projection as the most likely level of demand. This is discussed in full in section 1.4 of the LPEID and reflected in policy EI1 of the LPEID.</p> <p>The review is also informed by various studies produced or</p>
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		<p>commissioned by the Greater London Authority (GLA):</p> <p><a href="#">London Industrial Land Supply &amp; Economy Study 2015</a> (AECOM, prepared for GLA – March 2016)</p> <p>The council and GLA have had focussed DTC meetings and engagement to discuss evidence during this process.</p> <p><a href="#">London Office Policy Review 2014</a>, including the updates to the office employment forecasts in 2014</p> <p><a href="#">Small offices and mixed use in London’s Central Activities Zone (CAZ) 2015</a> (Ramidus Consulting Ltd, prepared for GLA – August 2015)</p> <p><a href="#">Supporting Places of Work: Incubators, Accelerators and Co-working Spaces</a> (URS, prepared on behalf of GLA, 2015)</p> <p><a href="#">The creative industries in London (GLA Economics working paper, 2015)</a></p> <p><a href="#">Workspace Providers Directory (GLA, January 2015)</a></p> <p><a href="#">London Business Survey 2014 (GLA Economics)</a></p> <p><a href="#">Artists’ Workspace Study (GLA 2014)</a></p> <p><a href="#">London Industrial Land Baseline (URS 2010)</a></p> <p><a href="#">London Wholesale Markets Review 2007 (GLA 2007)</a></p> <p>Other studies and reports produced by third parties that have been used to inform the approaches explored in this policy</p>
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		<p>options review include:</p> <p><a href="#">London 2036 – an agenda for jobs and growth (London Enterprise Panel, London First 2015)</a></p> <p><a href="#">Workspace Futures – the changing dynamics of office locations (NLP, 2015)</a></p> <p><a href="#">London’s industrial land: Cause for concern (J Fern &amp; E Jones, Bartlett School of Planning, February 2015)</a></p> <p><a href="#">Size matters: the importance of small firms in London’s economy (Centre for Cities, 2012)</a></p> <p>The policy options (within the consultation report) and the wider review have been informed by various evidence sources (above), in particular a new Employment Land and Premises Study (ELPS) commissioned from AECOM. The report from this study is available on the Council’s website <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>.</p> <p>The primary findings of the AECOM study gave ranges that set out in the forecasts give different growth scenarios, based either on the economic forecast for the borough itself or for the wider functional economic market area (FEMA) which includes surrounding boroughs.</p> <p>The report made a number of policy recommendations, which have informed the policy options consultation and the subsequent policies contained in the Submission version of the LPEID.</p>
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<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> <li>• Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</li> <li>• An audit trail of how the evidence base, consultation and SA have influenced the plan.</li> <li>• Sections of the SA Report showing the assessment of options and alternatives.</li> <li>• Reports on how decisions on the inclusion of policy were made.</li> <li>• Sections of the consultation document demonstrating how options were developed and appraised.</li> <li>• Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies.</li> </ul>	<p>A new Employment and Land and Premises study has been produced by AECOM, forecasting the need for industrial and employment land and premises to meet demand. The key themes raised in the initial Regulation 18 consultation carried out in December 2015-January 2016 are set out in the Preparation Stage Consultation Report, which is available on the Council's website at <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>.</p> <p>The responses to the Regulation 18 stage consultation then informed the questions set out in the policy options document which was consulted upon in October 2016, and was agreed by committee and Executive in September.</p> <p>The main issues raised in the policy options consultation are detailed here;</p> <p><a href="http://www.wandsworth.gov.uk/downloads/file/12430/local_pl_an_employment_and_industry_review_-_consultation_report_preparation_stage_-_march_2017">http://www.wandsworth.gov.uk/downloads/file/12430/local_pl_an_employment_and_industry_review_-_consultation_report_preparation_stage_-_march_2017</a></p> <p>The alternatives were consulted on in the informal options stage and tested separately in an Integrated Impact Assessment Scoping report. This IIA was carried out early on in the process which reviewed the baseline, strategic priorities, and the IIA objectives and was subject to consultation from the statutory consultees. This scoping report updated the SA (integrating EqIA) which had been undertaken for the Wandsworth Local Plan which was adopted in March 2016, which a Scoping Report relates (see below)</p>

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		<p>Information from the previous SA Report (<i>Wandsworth Local Plan Proposed Main Modifications Sustainability Appraisal Incorporating Equalities Impact Assessment, September 2015</i>) has been used and updated in the preparation of this document.</p> <p>Integrated Impact Assessment (IIA) report: <a href="http://www.wandsworth.gov.uk/downloads/file/12472/integrated_impact_assessment_-_scoping_report_-_october_2016">http://www.wandsworth.gov.uk/downloads/file/12472/integrated_impact_assessment_-_scoping_report_-_october_2016</a></p> <p>This fulfils the requirement for a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and also includes an Equalities Impact Assessment (EIA) and Health Impact Assessment (HIA).</p>
<p><b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> <li>• Be deliverable</li> <li>• Demonstrate sound infrastructure delivery planning</li> <li>• Have no regulatory or national planning barriers to its delivery</li> <li>• Have delivery partners who are signed up to it</li> <li>• Be coherent with the strategies of neighbouring authorities</li> <li>• Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>• Be flexible</li> <li>• Be able to be monitored</li> </ul>		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> <li>• Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives.</li> </ul>	<p>The adopted strategic objectives will last for the lifetime of the plan which is until 2030. The Adopted plan's vision and objectives are set out in Chapter 2 of the Adopted Core Strategy. The revised policies within the LPEID seek to deliver</p>

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<p>gaps in the policies, having regard to the objectives of the DPD?</p> <ul style="list-style-type: none"> <li>• Are the policies internally consistent?</li> <li>• Are there realistic timescales related to the objectives?</li> <li>• Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	<ul style="list-style-type: none"> <li>• Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</li> <li>• Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure.</li> <li>• Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix).</li> </ul>	<p>the objectives and are consistent with other adopted policies in the Plan and will sit alongside them.</p> <p>The vision and objectives set out in the Core Strategy are not subject to this review. They set out the following objectives which are for the lifetime of the plan 2016-33:</p> <ul style="list-style-type: none"> <li>• Seek to maximise the employment potential of land in the borough by safeguarding land and buildings for business and industrial use and promoting development for employment purposes in appropriate locations including as part of mixed use development so as to increase job and business opportunities.</li> <li>• Promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough.</li> <li>• Increase the viability and vitality of the town centres and local centres, including the proposed centres at Battersea Power Station and Vauxhall, as the focus for shopping and for employment and leisure and other community activities.</li> </ul> <p>The LPEID contains policies on encouraging sustainable economic growth (E11) and locations for new employment floorspace (E12). These policies seek to protect established and thriving economic areas as well as promoting redevelopment of sites and premises that have the potential to intensify in order to better meet the needs of the local economy.</p> <p>The council has carried out extensive consultations on the Plan to seek early feedback and input from the Duty to Cooperate bodies and other key stakeholders as well as interested parties and groups on the LPEID. Therefore, the plan has been</p>
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		<p>informed by the priorities of other agencies and services (such as the Environment Agency, GLA and Historic England.)</p> <p>The London Plan acknowledges the importance of industrial land in the Wandle Valley as being important to London as a whole and has consequently designated Wandsworth as a 'restricted transfer' borough - meaning that there is an in-principle strategic objection to the loss of industrial land due to its significance to London as whole. Duty to Cooperate meetings with the GLA at Regulation 18-19 stages and during the informal policy options stages have enabled information sharing of key employment evidence carried out by the borough (ELPS) and the GLA, such as growth scenarios and employment forecasts. The principles and proposed policy direction regarding retention of industrial land, promotion of offices, intensification of uses and proposed changes to the strategic Industrial Business Park boundary were identified to ensure that new policies and site allocations would not have adverse impacts on strategic planning. Further DtC engagement took place with the GLA after the publication of the Industrial Land Demand Study in 2017, and that the GLA have confirmed that they do not object to to the plan. Similarly the Local Plan Review has been informed by discussing with the GLA on the proposed 'direction of travel' for the forthcoming London Plan review. Strategic issues such as waste sites, apportionment and protected wharves are an on-going item, and the merits of reviewing these issues as a part of a full review were discussed and justified. Further details on issues raised with the GLA/London Plan are contained in the Statements of Consultation, and in the 'Letter of Conformity'.</p> <p>As set out in the Local Development Scheme 2015:</p>
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## Employment and Industry Policies: Soundness Self-Assessment Checklist (October 2017)

		<a href="http://www.wandsworth.gov.uk/downloads/file/11066/october_2015">http://www.wandsworth.gov.uk/downloads/file/11066/october_2015</a>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> <li>• Have the infrastructure implications of the policies clearly been identified?</li> <li>• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</li> <li>• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?</li> </ul>	<ul style="list-style-type: none"> <li>• A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward.</li> <li>• A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate.</li> <li>• Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues.</li> <li>• Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule.</li> </ul>	<p>This was not subject of the plan review.</p> <p>Sites have come forward through a call for sites process and have the industry support to ensure delivery. None of the proposals or allocations rely on a specific piece of infrastructure to be delivered.</p> <p>Plan wide viability has not been part of this review.</p> <p>However, as part of this partial review infrastructure providers, key agencies and other key stakeholders have been consulted throughout the preparation of the LPEID.</p> <p>The Borough's CIL is of importance in delivering strategic infrastructure; see <a href="http://www.wandsworth.gov.uk/downloads/file/6315/community_infrastructure_levy_cil_charging_schedule/">http://www.wandsworth.gov.uk/downloads/file/6315/community_infrastructure_levy_cil_charging_schedule/</a></p> <p>and the Regulation 123 list; <a href="http://www.wandsworth.gov.uk/downloads/file/6697/regulation_123_list_of_infrastructure_to_be_funded_by_cil/">http://www.wandsworth.gov.uk/downloads/file/6697/regulation_123_list_of_infrastructure_to_be_funded_by_cil/</a></p> <p>Which lists the infrastructure projects and/or types of infrastructure that the Council intends to fund in whole or in part from the CIL revenue. As detailed in the infrastructure delivery schedule 2015 <a href="http://www.wandsworth.gov.uk/downloads/file/10430/infrastructure_delivery_schedule_2015">http://www.wandsworth.gov.uk/downloads/file/10430/infrastructure_delivery_schedule_2015</a></p>
<i>Co-ordinated Planning</i>	<ul style="list-style-type: none"> <li>• Sections of the DPD that reflect the</li> </ul>	Yes the LPEID looks in more detail at the concept of spatial

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<p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>plans or strategies of the local authority and other bodies</p> <ul style="list-style-type: none"> <li>• Policies which seek to pull together different policy objectives</li> <li>• Expressions of support/representations from bodies responsible for other strategies affecting the area</li> </ul>	<p>planning. It sets out a clear vision as to what the borough will be like in 2031, which is supported by strategic objectives that outline what will need to be achieved to deliver the Local Plan's strategic vision such as Decentralised energy, Thames Tunnel, Hazard zones, flood risk, wandle valley regional park which are referred to in the LPEID and take account of their findings and objectives.</p> <p>Wandsworth is identified as a restricted transfer borough in the London Plan. The evidence of the London Industrial Land Supply and Economy Study (2015) shows that across London industrial land has been released at a much greater rate than the Industry and Transport SPG benchmark. In Wandsworth, the equivalent of 90% of the benchmark for the period up to 2031 (see the Wandsworth Employment Land and Premises Study, AECOM 2016) has already been lost to other uses.</p> <p>Representations from bodies such as Historic England were submitted as part of the consultation. Heritage assets are located in certain site allocations and Historic England have provided feedback regarding reference to Conservation Area Appraisals where appropriate and Archaeological Priority Areas which has been incorporated into the submission version. The area spatial strategy for the Wandle Delta seeks to protect the historic interest of Listed buildings ensuring they are protected and enhanced by any future development.</p> <p>In addition there have been supportive representations from bodies such as the GLA, Environment Agency and Wandle Valley Regional Park trust.</p>
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		<p>The approach taken in the Employment and Industry Document is a balanced one. It does plan for release of industrial land over and above that of the SPG benchmark, however this is tempered by additional protections and stringent requirements for newly-released sites.</p> <p>Policies which seek to pull together different objectives are set out by designation of protected Strategic Industrial Land, protected offices in town centres, and protection of the uses in the CAZ reflect adjacent boroughs, and London Plan policy direction. This is discussed in more detail in the Duty to Cooperate report.</p> <p>The Employment and Industry Document continues the approach taken in the adopted Local Plan for industrial land in Nine Elms and in Focal Points near the Thames. In these areas, and particularly at Nine Elms, there are significant regeneration projects underway and continuing this planned release is crucial in ensuring that those projects come to fruition, enabling major new development to provide the homes and jobs that Londoners and the residents of Wandsworth need.</p> <p>The Council has carried out extensive consultation, including with Duty to Cooperate bodies as well as partner agencies and key stakeholders. Representations from bodies responsible for other strategies have been received and taken into account in the preparation of the Plan.</p> <p>Representations from bodies responsible for other strategies have been received and taken into account in the preparation of the Plan.</p>
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<p><i>Flexibility</i></p> <ul style="list-style-type: none"> <li>• Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>• Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed.</li> <li>• Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor:             <ol style="list-style-type: none"> <li>a. the effectiveness of policies and what evidence is being collected to undertake this</li> <li>b. changes affecting the baseline information and any information on trends on which the DPD is based</li> </ol> </li> <li>• Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> <li>• Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>• Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required.</li> </ul>	<p>The partial review is regarded as flexible to respond to unexpected changes in circumstances. The Council considers that they can be interpreted flexibly if necessary. Marketing and viability evidence are required within policies EI3 and EI7 where redundancy of employment premises occur.</p> <p>The policies will be subject to regular review and this includes the strategic policies within the London Plan. WBC considers the plan to be based on robust and credible evidence base. Policy performance is recorded in the Authority's Monitoring report and this informs priorities for future review. A monitoring report is publicised and the monitoring indicators have been agreed as part of the adopted Core Strategy The council have set out in a separate document the new indicators for monitoring the new policies. If upon annual monitoring the policies are not working as expected then the council would review the plan.</p> <p>Growth scenarios were identified by the AECOM ELPS 2016 and were used as a broad indication of likely demand for economic uses for the lifetime of the plan and have been set out in the document. It is considered that the approach set out in the LPEID on protecting and re-designation of employment land is sound and based on a robust and credible evidence base. The London Plan identifies Wandsworth as a 'restricted transfer with exceptional planned release' borough, meaning that there is an in principle presumption to protect the existing industrial land and to adopt a more restrictive approach to the transfer of industrial sites to other uses. The Wandsworth Employment Land and Premises Study (2016) also identifies a cautious approach to the release of industrial land as there is not sufficient supply of industrial land to meet the total forecast demand for industrial land set out in the ELPS. The Study recommends that that to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include</p>
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		<p>higher density employment uses (e.g. B1a/b) through designation of an Industrial Business Park is recommended. This advice has been applied for the proposed extension of the current IBP which is considered to be in accordance with the evidence base and the London Plan. In addition the Study recommends that where opportunities exist to intensify some industrial sites to increase industrial floorspace the loss of some industrial land may be justified if the resulting floorspace is of better quality and is more suited to modern industrial needs, and that the spatial character of the area is improved in accordance with the NPPF. The sites identified in the Study as being most suitable for re-designation and intensification are the Bingo Hall site in the existing Bendon Valley LSIA and the Wandsworth Gasholder in the existing Central Wandsworth LSIA.</p> <p>It is considered that this approach is also supported by the London Industrial Demand Study 2017: this confirms a positive demand / benchmark for the borough driven by logistics. The positive number is +16.3ha (and a 0.5% ind. vacancy rate – where 8% is considered healthy for efficient market operation, the lower the % the less scope for release of industrial capacity). This Study states that intensification can be achieved through: more efficient use of existing floorspace, higher intensity of development on existing land and through higher density forms of activity replacing less dense activity. This study is available at <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/full-review-evidence-base</a>. The approach of the EILP has been confirmed as being an appropriate one with the GLA after release of the Industrial Demand Study. The Council considers that both the local and London-wide research demonstrate the importance of safeguarding existing employment land within the borough and considers the approach to re-designation and intensification in accordance with this evidence.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> <li>• Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being</li> </ul>	<ul style="list-style-type: none"> <li>• A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A ‘tick box’ approach or a collection of correspondence is not</li> </ul>	<p>The Council has worked closely with neighbouring boroughs and the prescribed Duty to Cooperate bodies and other relevant organisation as set out in the Duty to Cooperate report which forms part of the submission document library on the Council’s</p>

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<p>examined?</p> <ul style="list-style-type: none"> <li>• Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	<p>sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> <li>• The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</li> </ul>	<p>website. .</p> <p>It shows that no strategic issues were identified as part of this focused Local Plan review, which involved at different stages the adjoining boroughs and the GLA, to discuss issues such as; joint working in waste and the sharing of evidence, reasons for policy options and good practise were discussed.</p> <p>It highlights the policy outcomes of cooperation, evidence of having cooperated and liaison with consultees. In summary, the following was undertaken</p> <p>As part of preparing and developing the Employment and Industry review, the Employment and Industry Document is underpinned by the London Plan evidence base prepared by the GLA group and other relevant authorities. All stages of the Plan's development have been prepared in accordance with national and regional policies, particularly the London Plan (2016).</p> <p>The council is a member of Central London Forward, a sub-regional partnership of central London Boroughs. This facilitates discussion between the boroughs, TFL, the GLA and other Central London stakeholders on a range of planning, transportation and regeneration/economic development issues. The LEP is also a prescribed duty-to-cooperate body and the Council has considered the relevance in the DTC statement which is part of the evidence base and can be found here:- <a href="http://www.wandsworth.gov.uk/employmentlandreview">www.wandsworth.gov.uk/employmentlandreview</a>. Regular engagement takes place with both the Environment Agency and with Thames Water on planning policy issues and on planning applications in relation to water and sewer capacity, and flood risk which are also strategic issues. In their capacity as a Lead</p>
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		<p>Local Flood Authority (LLFA) Wandsworth planning policy officers attend regular LoDEG (London Drainage Engineers Group) meetings along with the other London borough officers to discuss flood risk, SUDs and related drainage issues. LoDEG's remit aims to facilitate partnership working between London Boroughs and other risk management authorities (including the Environment Agency, GLA and Thames Water); formulate and provide advice; and to promote best practice, and share knowledge and experience within the profession.</p> <p><b>Engagement on a sub-regional level</b></p> <p>As detailed above, there is on going duty-to -cooperate engagement with adjoining boroughs which are part of the housing market area or functional economic market area FEMA. Each of these boroughs, in developing its own local plan has carried out on-going Duty to Cooperate engagement. In developing the Employment and Industry Document, regular correspondence and/or meetings have taken place with adjoining boroughs under the Duty to Cooperate at all stages including the informal policy options stage, and these have been summarised in Appendix 1 and set out in more detail in the relevant Statement of Consultation. Strategic transport, waste and wharves, industrial and employment land, Wandle Valley and the Thames riverside are specific strategic matters relevant to this review that are common policy areas with adjoining boroughs.</p> <p><b>Waste</b></p> <p>Waste planning and policy is a standing item on Duty to Co-operate meetings with the four WPA boroughs, who are at different stages in plan-making. Whilst waste and working</p>
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		<p>wharves policies are explained in the LPEID Duty to Cooperate meetings with these boroughs will help inform any changes to waste policies and safeguarded wharves which will be undertaken as part of the full review of the Local Plan.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> <li>• Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>• Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>• Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD setting out indicators, targets and milestones</li> <li>• Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>• Reference to any other reports or technical documents which contain information on the delivery of policies</li> <li>• Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal</li> </ul>	<p>Yes, please see adopted Core Strategy Chapter 5: Implementation and Delivery and also Appendix 1. This shows the indicators and targets relating to the delivery of the policies. An updated monitoring framework will be finalised to take account of the new policies once adopted. The authority monitoring report contains the housing trajectory.</p> <p>The information collected as part of the preparation of the monitoring will also feed into annual monitoring systems set up by the GLA and TFL.</p> <p>Through the Authorities Monitoring Report process, if it has been identified that Local Plan targets have not been met, the Council will assess whether it is necessary to review policies in order to secure delivery of the spatial vision, consider alternative strategies, or take appropriate management action.</p>
<p><b><i>Consistent with national policy:</i></b> the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> <li>• Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>• Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	<ul style="list-style-type: none"> <li>• Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons.</li> <li>• Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy.</li> <li>• Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from</li> </ul>	<p>No. All policies within the Local Plan are consistent with national policy.</p> <p>Neither do the documents that comprise the Local Plan (Core Strategy, DMPD and SSAD) repeat national policy. Where relevant,</p>

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	<p>the results of community involvement.</p> <ul style="list-style-type: none"> <li>• Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement</li> <li>• Reports or copies of correspondence as to how representations have been considered and dealt with.</li> </ul>	<p>mention is made to the NPPF, 2012 and National Planning Policy Guidance so that policy compliance can be demonstrated and/or aid the cross-referencing of planning guidance.</p> <p>All policies are considered to be locally specific and representative of the local issues raised through the plan formulation process.</p>
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## Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy A: Using evidence to plan positively and manage development (para 6)</b></p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> <li>• Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups.</li> </ul>	<p>This was not part of the LPEID. For context the adopted Core Strategy Policy IS5 identifies a site that is currently managed to be safeguarded. This was established by comprehensive evidence base such as the SHMA 2012 which undertook a detailed review for gypsy and traveller pitches and was undertaken including contacting known traveller groups and canvassing travellers resident in the borough on any unmet needs. The Council considers this approach to still be sound and robust, and there have been no changes in circumstances.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> <li>• Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan.</li> <li>• Collaborative working with neighbouring local planning authorities.</li> <li>• A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions.</li> </ul>	<p>This was not part of the LPEID. Please see response above.</p>
<p><b>Policy B: Planning for traveller sites (paras 7-11)</b></p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> <li>• Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15.</li> <li>• An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified.</li> <li>• Policy which takes into account criteria a-h of para 11</li> </ul>	<p>This was not part of the LPEID. Please see response above.</p>
<p><b>Policy C: Sites in rural areas and the</b></p>		

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Policy Expectations	Possible Evidence	Evidence Provided
<b>countryside (para 12)</b>		
When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.		N/A
<b>Policy D: Rural exception sites (para 13)</b>		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> <li>• If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity.</li> </ul>	N/A
<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> <li>• Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process.</li> </ul>	This was not part of the LPEID. Please see response above.

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Policy Expectations	Possible Evidence	Evidence Provided
<p><b>Policy F: Mixed planning use traveller sites (paras 16-18)</b></p>		
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<ul style="list-style-type: none"> <li>• Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</li> <li>• N.B. Mixed use should not be permitted on rural exception sites</li> </ul>	<p>This was not part of the LPEID. Please see response above.</p>
<p><b>Policy G: Major development projects (para 19)</b></p>		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> <li>• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.</li> </ul>	<p>N/A</p>

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### Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

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In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all<sup>1</sup> public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions<sup>2</sup>

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

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<sup>1</sup> Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

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These aims are further supported by footnote 36 in the NPPF.

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<sup>2</sup> For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

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Policy Expectations	Possible Evidence	Evidence Provided
<b>Key requirements under the Duty to Co-Operate</b>		
<p>Consistency between marine and terrestrial policy documents and guidance</p>	<ul style="list-style-type: none"> <li>• Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans)</li> <li>• Proof of collaborative working with the MMO and that the MPS has been taken into account.</li> </ul>	<p>The MMO did not object to any element of the LPEID, nor did they take up the opportunity of a meeting with the Council when this was offered. There were no conflicts with the plan and therefore this was not deemed an issue to not have a meeting.</p> <p>The MMO introduced the South East plan in the September 2017 DTC meeting.</p> <p>A Marine Plan has not yet been drafted. As part of the Duty to Cooperate the MMO have been consulted during the formation of the LPEID. The Marine Management Organisation (MMO) contacted Wandsworth specifically</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		<p>under the Duty to Cooperate in July 2017 as part of on-going initial engagement to discuss marine planning. The main emphasis was on dissemination of the new MMO South East Marine Plan, alongside Wandsworth specific issues/priorities and the integration with terrestrial plans. A Duty to Cooperate meeting with the MMO was held in September 2017 together with Richmond council to provide an overview of Marine planning and the future marine plan for the area and for boroughs to share information on river related issues.</p> <p>This has been summarised in the Duty to Cooperate Report</p> <p>Representations from the MMO have been summarised and a response from the Authority is within the DTC</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		report.
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> <li>• Early and effective policy development engagement undertaken, including discussions with the MMO</li> <li>• Evidence of iteration of policies and plans as a result of engagement with the MMO</li> <li>• Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle</li> <li>• Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS</li> </ul>	<p>As part of the duty to cooperate the MMO have been consulted during the process of the LPEID. This has been summarised in the Duty to Cooperate Report.</p> <p>The MMO did not object to any element of the LPEID, nor did they take up the opportunity of a meeting with the Council when this was offered.</p>
Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions	<ul style="list-style-type: none"> <li>• Evidence that the LPA has shared or provided relevant data to the MMO that can help inform Marine Plans or MPS review</li> <li>• Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS</li> </ul>	<p>This was not considered necessary for the LPEID.</p> <p>For reference the Adopted Core Strategy PL2: Flood Risk and DM Policy DMS5: Flood</p>

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Policy Expectations	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> <li>• Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans</li> </ul>	Risk both contribute to the vision of achieving development whilst minimising residual risks through appropriate flood risk measures.
<b>Marine Policy Statement- Chapter 2: General Principles for Decision-Making<sup>3</sup></b>		
<b>Sections 2.1 -2.2: The UK vision for the marine environment</b>		
The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')  Achieving the vision through marine planning	<ul style="list-style-type: none"> <li>• Reference in DPD where appropriate to UK vision for the marine environment</li> <li>• Contribution to the vision through local plan policies and supporting text</li> </ul>	See Adopted Core Strategy Spatial Vision and Strategic Objectives for Wandsworth Chapter 2.
<b>Section 2.4: Considering benefits and adverse effects in marine planning</b>		

<sup>3</sup> As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

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Policy Expectations	Possible Evidence	Evidence Provided
Consider benefits and adverse effects of plan policies	<ul style="list-style-type: none"> <li>• Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal</li> </ul>	This not part of the LPEID review however please see Scoping report and Integrated Impact Assessment as this updates plans on biodiversity on river development.
<b>Section 2.5: Economic, social and environmental considerations</b>	<ul style="list-style-type: none"> <li>•</li> </ul>	
Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)	<ul style="list-style-type: none"> <li>• Reference to relevant EU Directives in DPD and sustainability appraisal</li> <li>• Consideration of contribution of DPD policies to the objectives of relevant EU Directives</li> </ul>	Please see Scoping report and Integrated Impact Assessment.
<b>Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities</b>		
<b>3.1 Marine Protected Areas</b>		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on</p>	<ul style="list-style-type: none"> <li>• Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s)</li> <li>• Consideration of impacts of policy and/or terrestrial development on those areas and features of importance</li> </ul>	This was not part of the review. For context please see adopted policies DMO4: Nature Conservation. Where data is available the scoping report has updated the

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Policy Expectations	Possible Evidence	Evidence Provided
biodiversity should be designed or located to avoid such impacts	<ul style="list-style-type: none"> <li>Measures to mitigate, monitor and manage negative impacts on those areas and features of importance</li> </ul>	ecological and environmental baseline.
<b>3.4 Ports and shipping</b>		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> <li>Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector</li> <li>Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector</li> </ul>	Please see Adopted Plan Policy DMO7: Development in the river and on the foreshore. This policy ensures that the use of docks and safeguarded wharves are not harmed by river related development.
<b>3.8 Fisheries</b>		
Consider potential economic, social and environmental impacts of other developments on fishing activity	<ul style="list-style-type: none"> <li>Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture</li> </ul>	It is considered that this policy area does not form part of the LPEID and therefore there is no specific policy on this issue.
<b>3.9 Aquaculture</b>		
Consider the benefits of encouraging the development of efficient, competitive and	<ul style="list-style-type: none"> <li>Where relevant, evidence that the benefits of aquaculture industry development have been considered</li> </ul>	It is considered that this policy area does not form part of the LPEID and

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Policy Expectations	Possible Evidence	Evidence Provided
sustainable aquaculture industries		therefore there is no specific policy on this issue.
<b>3.10 Surface water management and waste water treatment and disposal</b>		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> <li>Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location</li> </ul>	See Policy Adopted Core Strategy PL2: Flood Risk and Development Management Policy DMS5: Flood Risk both ensure that any development that is at risk of flooding takes account of Flood Risk management plans.
<b>3.11 Tourism and recreation</b>		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities	<ul style="list-style-type: none"> <li>Where relevant, reference to marine tourism and recreation</li> <li>Evidence that the potential for marine tourism and recreation has been recognised in plan-making</li> </ul>	<p>Please see adopted Policy DMO7: Development in the river and on the foreshore. This policy ensures that <i>'the character and open nature of the river and riverside is not harmed.'</i></p> <p>The LPEID Area Spatial Strategy for Wandle Delta identifies that the area contains listed and locally</p>

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Policy Expectations	Possible Evidence	Evidence Provided
		<p>listed buildings that add its unique character. Investment in the area will present opportunities to improve permeability across the Delta and improve walking and cycling routes along the Thames Path and Wandle Trail. New development will enable improvements to biodiversity and ecology, and create a more welcoming public realm and better links to the town.</p>

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## Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	City of Kingston upon Hull	Gloucester	Liverpool
Allerdale	City of Peterborough	Gosport	Maidstone
Arun	City of Plymouth	Gravesham	Maldon
Babergh	City of Portsmouth	Great Yarmouth	Medway
Barking and Dagenham	City of Southampton	Greenwich	Middlesbrough
Barrow-in-Furness	City of Westminster	Halton	New Forest
Basildon	Colchester	Hambleton	New Forest National Park
Bassetlaw	Copeland	Hammersmith and Fulham	Newark and Sherwood
Bexley	Cornwall	Hartlepool	Newcastle upon Tyne
Blackpool	County Durham	Hastings	Newham
Boston	Dartford	Havant	North Devon
Bournemouth	Doncaster	Havering	North East Lincolnshire
Broadland	Dover	Horsham	North Lincolnshire
Broads Authority	East Cambridgeshire	Hounslow	North Norfolk
Canterbury	East Devon	Huntingdonshire	North Somerset
Carlisle	East Lindsey	Ipswich	North Tyneside
Castle Point	East Riding of Yorkshire	Isle of Wight	North York Moors National Park
Chelmsford	Eastbourne	Isles of Scilly	Northumberland
Cheshire West and Chester	Eastleigh	Kensington and Chelsea	Norwich
Chichester	Exeter	King's Lynn and West Norfolk	Poole
Chorley	Exmoor National Park	Lake District National Park	Preston
Christchurch	Fareham	Lambeth	Purbeck
City of London	Fenland	Lancaster	Redcar and Cleveland
City of Brighton and Hove	Fylde	Lewes	Richmond upon Thames
City of Bristol	Gateshead	Lewisham	

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Rochford	Tonbridge and Malling
Rother	Torbay
Scarborough	Torridge
Sedgemoor	Tower Hamlets
Sefton	Wandsworth
Selby	Warrington
Shepway	Waveney
South Cambridgeshire	Wealden
South Downs National Park	West Devon
South Gloucestershire	West Dorset
South Hams	West Lancashire
South Holland	West Lindsey
South Lakeland	West Somerset
South Norfolk	Weymouth and Portland
South Ribble	Winchester
South Somerset	Wirral
South Tyneside	Worthing
Southend-on-Sea	Wyre
Southwark	York
Stockton-on-Tees	
Stroud	
Suffolk Coastal	
Sunderland	
Swale	
Taunton Deane	
Teignbridge	
Tendring	
Test Valley	
Thanet	
Thurrock	