



Mr Kenneth Stone
c/o Banks Solutions
Flat 3 Stanmore House
118-120 High Street
Billingshurst
RH14 9QS

Wandsworth Council

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

Please contact: Adam Hutchings
Telephone: (020) 8871 6650
Fax: (020) 8871 6003
Email: ahutchings@wandsworth.gov.uk
Web: www.wandsworth.gov.uk
Minicom: (020) 8871 8403

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Dear Mr Stone

Wandsworth Council – Examination of Local Plan Employment and Industry Document (LPEID) Inspector's Main Issues and Questions to the Council (ref ID/002)

Thank you for your communication dated 1 December 2017, reference ID/002 raising Main Issues and Questions on the Local Plan: Employment and Industry Document (LPEID).

The following sets out the matters you have raised and our response:

Issue 1: Does the plan meet all its legal requirements?

Q1: Does the LPEID meet all its requirements in relation to the Local Development Scheme, Statement of Community Involvement, Sustainability Appraisal, Habitats Regulations, Public Sector Equality Duty and the Town and Country Planning (Local Planning)(England)Regulations 2012?

Council response

Yes – the Council considers that the LPEID has been prepared in accordance with the statutory procedures and Regulations as set out below.

Town and Country Planning (Local Planning)(England) Regulations 2012:
The Council considers it has met and fully documented its legal requirements in respect of the Regulations for the LPEID preparation as documented within the Legal Compliance Checklist (SD-014), and the Council's legal requirements overall have also been confirmed and checked in preparing the Soundness Self-Assessment Checklist (SD-013). The Legal Compliance checklist provides an overview of the evidence to demonstrate how the preparation of the LPEID has met these regulations and the requirements of the NPPF at all stages of plan making. It confirms that the Statements of Consultation and Duty to Cooperate Statement (Regulation 4) list the respective statutory stakeholder bodies contacted and provides evidence of how these organisations have been consulted and

representations considered, including through electronic communication, at Regulation 18 and 19 stages.

More specifically: Regulation 18 - Preparation of a local plan: both the preparation of evidence, stakeholder engagement and consultation was carried out in accordance with the regulations, and as reported in Stages 1 and 2 of the of the Legal Compliance Checklist (SD-014). In addition the Council incorporated the list of statutory stakeholders, including those specified for SEA and Duty to Cooperate stakeholder engagement in its consultation database as required by Parts 1 and 2 of these Regulations. The Council went beyond the minimum legal requirement and carried out an additional round of consultation at Regulation 18 stage, reflecting the feedback from the initial broader Issues consultation. The additional relevant organisations and public bodies identified for Duty to Cooperate and SEA engagement beyond those listed in the regulations are reported in the Duty to Cooperate report and final Scoping report.

Regulation 19 - Publication of a local plan: stage 4 of the Legal Compliance Checklist sets out how the Council has met each of the requirements for the various stages and tasks required at Publication stage including Regulation 20 - representations relating to a local plan (Stage 4, Activity 2 in the Legal Compliance Checklist), as well as for Stage 5 Submission of the plan (Regulation 22). The Council has engaged with the GLA during the preparation of the LPEID including on the local and strategic evidence base, and correspondence on the statement of conformity is set out in document SD-028 (Regulation 21). The Legal Compliance Checklist summarises what took place in this respect under the headings Stage 3 Activity 2, and Stage 4, Activity 7 of this document.

LDS: The Plan has been produced in accordance with the milestone dates set in the adopted 2015 LDS and its update of November 2017. The update anticipates taking into account the further round of public consultation to be undertaken during the Examination process to consider any modifications proposed by the Council and/or recommended by the Inspector. The Council considers it has therefore met the legal requirements in this respect, as summarised in Stage 1 in the Legal Compliance Checklist (SD-014).

Statement of Community Involvement: The report (SD-022) documents how the Council has committed to engage in policy consultation at all stages of plan making. The SCI, adopted in 2012, includes a section on Wandsworth's approach to engaging and consulting Development Plan Documents (DPDs), the scope and types of consultation and community involvement in the Local Plan Process, the process of producing documents and how the Council will report back on representations. Reporting back via the Statements of Consultation as required in this respect and has been included in the Examination library documents (SD-04 to SD-09 inclusive). The Legal Compliance Checklist summarises how the SCI and the engagement/participation has been documented against the relevant legal requirements particularly in Stage 1, Activity 2, Stage 4, Activity 2 and Stage 5, Activity 3 in the checklist.

Habitats Regulations: Additional correspondence with Natural England on the Habitats Regulations is provided in Submission document SD-017 and post-submission documents PS-001, PS-003 and PS-005, and demonstrates how the LPEID has been produced in accordance with these Regulations and has had constructive engagement with Natural England. In particular document ID/01 and attachments identify that on-going discussions and information exchange took place with Natural England on points of detail to ensure that the preparation of the LPEID has met the legal requirements and that Natural England is satisfied that no further scoping or evidence is required. The Legal Compliance checklist lists the tasks or requirements (Stage 3, Activity 12, Stage 4 Activity 7) alongside the relevant legal requirement – in this respect the Habitats Directive and Regulations 17, 19, 20 and 35).

Public Sector Equality Duty: The Council works corporately to eliminate unlawful discrimination, advance equality of opportunity and foster good relations through a long

standing approach of mainstreaming equalities. In the Planning Service this duty is implemented primarily through Equality Impact Assessment. Equality Impact Assessment of the LPEID has been integrated into the Integrated Impact Assessment (IIA) Report (SD - 003).

SA/IIA: In respect of the evidence base for the IIA, this was established in a new Scoping Report (October 2016) which updated the baseline evidence to inform updated IAA objectives and future monitoring indicators. The Council consulted the statutory consultation bodies, inclusive of the Strategic Environmental Assessment (SEA) statutory bodies, as required by the Regulations for the IIA (Sustainability Appraisal (SA)) and draft Scoping Reports for a 5 week period on the draft Scoping report. From the initial draft Scoping report stage, the Council went beyond the minimal requirements and engaged additional relevant bodies such as Wandsworth Public Health and Enable, who provide parks, open space and leisure management services for Wandsworth Council. The initial Scoping Report, and consultation responses have been considered and documented in the final Scoping Report (and annexes) and in the relevant Statements of Consultation during the progression of the LPEID as in Submission documents SD-027 and SD-028. How the Council has met the SEA/IIA production and consultation requirements is summarised alongside the referenced Regulations in the Legal Compliance Checklist which in itself states that the Council has taken account of the SEA guide as follows: (Stage 1, Activity 8 ; Stage 2, Activities 2, 5 and 10; Stage 3, Activities 1 and 10 - the Council has included here the no plan option as well as the 'London Plan only' as alternative options; Stage 4, Activity 1; and Stage 5, Activity 5).

Q2: Should the time frame for the plan be clearly identified? Paragraph 1 indicates it will guide development over the next 15 years, however the plan contains strategic and non-strategic policies and supersedes policies in the Core Strategy, DMPD and SSAD, (adopted 2016), which cover the period 2015-2030. This partial review document covers the period 2016-2031?

Council response

Agree. The LPEID forms part of the Local Plan, setting out relevant updated planning policies and allocating sites. Therefore, as this document provides updated information to the adopted Local Plan policies, the baseline for this information and the starting date runs from 2016. The Council agrees that it would be beneficial to add wording in paragraph 1 of the LPEID to clarify that the 15 year period identified will be the period 2016-2031. The following proposed wording is suggested and can be added to the ongoing modification table:

'It will guide development in the borough over the next 15 years (2016-2031) and will be used to inform decisions on planning applications.'

Issue 2: Will the LPEID positively support the strategic visions, objectives and spatial policies contained in the Core Strategy?

Q3: Will the LPEID positively support the strategic visions, objectives and spatial policies contained in the Core Strategy?

Council response

Yes, the Council considers the Plan positively supports the strategic visions, objectives and spatial policies contained in the Core Strategy. As the LPEID is a partial review of the Council's Local Plan, the vision and objectives were not subject to review. However, the LPEID was prepared and produced in accordance with the visions, objectives and spatial policies.

The LPEID sets out policies and site allocations relating to planning for employment and industry in the borough and the review therefore has focussed upon the economic related visions and objectives. Strategic opportunities and references to the contribution made by the LPEID to achieving the Core Strategy spatial vision and strategic objectives are stated in paragraphs 1.48-1.53 of the LPEID. The adopted Wandsworth Core Strategy identifies key issues, problems and challenges: particularly relevant to the LPEID, paragraph 2.14 states that 'The promotion of the economy and local employment is a main objective of the CBP' (Corporate Business Plan). In response to these challenges, the document also sets out a Spatial Vision and Strategic Objectives for Wandsworth (page 18 sections 3).

The following table sets out further detail on how the LPEID supports the vision and objectives.

Core Strategy Spatial Vision and Strategic Objectives	Where addressed by LPEID policies
<p>Regeneration activity including tackling pockets of deprivation in Battersea, Tooting and Roehampton, with the main areas of change and development being the Thames riverside, the town centres and Nine Elms Vauxhall, including the development of a new town centre at Battersea Power Station.</p>	<p>Policy E11 - encourages sustainable economic growth and requires employment floorspace to be included in regeneration initiatives, focussing in areas lacking local jobs and seeks to promote redevelopment of sites and premises that have the potential to intensify the area.</p> <p>Policy E12 – identifies Roehampton as a regeneration initiative that will be supported for a new employment location.</p> <p>Policies (3-7) and Site Allocations – support redevelopment for employment and housing growth, along with and public realm improvements, particularly on riverside locations.</p>
<p>New mixed use quarters opening up the riverside and well linked into existing communities.</p>	<p>E11 –encourages employment floorspace as part of mixed use development on sites in Focal points.</p> <p>E12 – Locations for new employment floorspace E13 (3-7); Area Spatial Strategy for the Wandle Delta and Site Allocations – support redevelopment for employment and housing growth, along with and public realm improvements, particularly on riverside locations.</p>
<p>A range of opportunities for local business activity, including start up and small enterprises, in mixed use developments.</p>	<p>E11 sets out the strategic approach to intensifying identified locations and providing workspace for SMEs.</p> <p>The LPEID achieves the objective as it sets out in policy E1 that a strategic reservoir of land for industry and waste will be retained and protected. It also specifies that a range of floorspace must be flexible, affordable and meet the needs of emerging and growing industries.</p> <p>Policy E14 – this policy seeks to ensure that premises provide the flexibility that</p>

	<p>businesses need in order to flourish. Managed workspace is encouraged and this offers opportunities for affordability, flexibility and opportunity to incorporate business support features.</p> <p>Policy EI6 identifies areas with the Queenstown Road SIL where it would be appropriate for smaller scale offices that provide accommodation for SMEs.</p>
<p>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>EI1 - Encourages sustainable economic growth and seeks to protect established and thriving economic areas.</p> <p>EI3 – Protected employment land and premises to help the borough retain a strategic reservoir of industrial land. Seeks to protect established, identified industrial land which provides for strategically important functions such as waste management, transport, aggregate transfer, wholesale markets and distribution.</p> <p>EI6 - This policy protects the strategic reservoir of industrial land and identifies the uses that will be acceptable in the SIL and LSIA areas.</p> <p>Site Allocations – The site allocations set out where redevelopment opportunities exist for intensification and protection of industrial uses.</p>

The Core Strategy’s strategic economic objectives are set out in paragraph 3.3 (page 19) and are supported by the LPEID as follows:

Core Strategy Economic Objectives	Where addressed by LPEID policies
<p>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.</p>	<p>LPEID Policy EI1 sets out the strategic approach to economic growth, and promotes and protects land for business and industrial uses. Policy EI2 is the overarching policy which identifies the main locations for employment growth</p>
<p>Promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the over-whelming number of businesses in the borough.</p>	<p>Policy EI4 sets out criteria aiming to secure affordable flexible and well- managed workspaces</p>
<p>Secure regeneration in areas of deprivation to reduce poverty and social exclusion.</p>	<p>Policies EI1(5) and EI2 (3) support employment generating development initiatives in regeneration areas</p>

	The policies within the LPEID set out a strategic approach and the document will continue to protect the more successful industrial areas, and will re-designate some sites that are under utilised for mixed uses. They also can provide residential uses to meet the boroughs housing needs as well as business
Seek to ensure that the scale of development is related to environmental capacity and the capacity of public transport and other infrastructure.	The LPEID relates the intensity of development to sustainable locations which are well served by public transport, walking and cycling, or where capacity improvement commitments are already in place such as the extension to the Northern Line. It is also intended that by providing a range of training, securing local employment commitments and employment opportunities, this reduces the need to travel for local residents to access employment opportunities.
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.	Policy E11 and E12 reiterates the Core Strategy policy commitment to focus the majority of office development in the borough's town centres and VNEB (policy PL8) Policy E1 focusses new office development in the established town centres and at Battersea Power station, to ensure the town centres can thrive and grow and to support sustainable economic growth.

The Council considers that there are no spatial policy gaps and each economic objective can be clearly linked to a relevant policy in the plan. The LPEID has been through public consultation and various internal Council approvals.

Issue 3: Are the individual policies clear, justified and consistent with national policy and will they be effective?

Questions and comments on individual policies

Policy E11 – (Strategic Policy) – Encouraging sustainable economic growth.

Q4 Does this provide a clear, justified framework that is consistent with national policy in terms of long term protection of industrial land?

Council response

The Council considers that policy E11 strikes an appropriate balance between protecting the borough's industrial land for redevelopment in appropriate circumstances. This is consistent with Paragraph 22 of the NPPF, which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. Strong emphasis is placed on the requirement for applications to demonstrate that there is no longer demand for an industrial use on Employment Protected Areas through the provision of marketing evidence. This is considered to be a crucial approach to continue to safeguard industrial land within the borough.

Q5 Is the overall level of planned industrial supply appropriate, sufficient and realistic taking into account the forecast demand, the identified potentially shortfall against the London Plan benchmark by 2031, the low growth demand, the fact that some 36.9ha of industrial land has been lost between 2011 and 2016 and that the latest GLA evidence is that Wandsworth may need to increase floorspace capacity for industry and warehousing over the coming plan period?

Council's response

The London Plan (2016) categorises Wandsworth as a borough which should restrict the transfer of industrial land to other uses (though there is a recognised case for exceptional planned release at Opportunity Area VNEB). Supporting this policy, Annex 1 of the SPG Land for Industry and Transport (2012) quantifies the industrial land release by borough over the London Plan period. For LB Wandsworth the benchmark release over the period 2011 to 2031 is 41ha. However, work undertaken on the changing supply of industrial land in London has highlighted that the transfer of industrial land to other land uses has not been in line with the proposed benchmark rates. Building on data from the GLA's Industrial Land Supply and Economy (2015) the LBW ELPS estimates that between 2010 and 2016, 36.9ha of industrial land in LBW was transferred to non-industrial use.

The rate of loss of industrial land significantly in excess of benchmark targets has been seen across a number of areas of London and is something which emerging policy (Draft London Plan, 2017) and supporting documents (London Industrial Land Demand, 2017) seek to address. The Draft London Plan (2017), which draws on the GLA's updated land supply evidence as well as demand projections, proposes to categorise the borough as 'Provide capacity', with regard to the management of its industrial land for the next 20-25 years. The demand study estimates that LBW's net requirement for floorspace to meet demand going forward over the next 20-25 years equates to 16.4ha, though the level of demand 'should be treated with a degree of caution as most demand relates to the property market area rather than a specific Borough.' In applying this in planning policy the Draft London Plan, in recognition of the constrained supply of industrial land, places an emphasis on the efficient use of existing industrial land to meet demand and so sets out its policies having regard to floorspace rather than land. Specifically, Policy E4 of the Draft London Plan highlights the importance of the borough-level categorisations to ensure that across London 'overall ...there is no net loss of industrial floorspace within designated SILs and LSIAs.' It also states in Policy E7 the importance of intensification, substitution and co-location of industrial activity to support London's economic function.

The LPEID recognises the pressures on industrial land and the emerging policy position on better utilisation of existing land and has set out active policies to tackle the demand for provision. LBW LPEID Policy E12 identifies Economic Use Intensification Areas (EUIA), which through intensification and consolidation of uses EUIAs will aim to provide an overall increase in industrial and other business floorspace. Redevelopment within these areas

should provide at least a 25% increase in the amount of industrial (and office) floorspace. Policy EI3 and EI6 also sets out how industrial land is to be protected which includes identification of areas which could be intensified: the northern and western edges of the Queenstown Road, Battersea SIL, are promoted for Industrial Business Park (IBP) and are identified as having capacity to provide intensified economic uses including industrial floorspace as well as workspace for SMEs.

In seeking to prevent release of other industrial sites (i.e. those not designated as SIL or LSIA) Policy EI3 of the LPEID responds to the potential for such un-designated sites to be redeveloped for non-employment uses by designating sites either partly or wholly in industrial use/ economic use as Employment Protection Areas (EPA).

Change of use within EPAs will only be permitted if there is no net loss of existing employment floorspace levels, provided a mix of uses can be achieved in accordance with Policy EI5. This criterion recognises that meeting the evidenced demand for industrial sites and premises requires a restrictive approach to the release of small, often lower quality, industrial sites and the redevelopment of them for better quality floorspace co-located with other uses; release of such other industrial sites accounted for a significant amount of industrial land lost in Wandsworth between 2010 and 2015.

It is considered that the approach taken strikes a balance between wanting to encourage redevelopment of under-utilised sites (eg. the gas holder, the Bendon Valley car park) that in practical terms aren't contributing in meeting the borough's and London's need for industrial functions, and intensifying those industrial spaces. If the Council's stance was for no release of industrial land, it is considered highly likely that vacant sites would not be developed for industrial purposes. The Council's stance provides opportunities to intensify sites in particular in Economic Use Intensification Areas which will result in increased industrial floorspace that is of better quality and more suited to modern needs.

Whether demand is realised and catered for is determined by a range of factors many of which are outside the control of policy. Implicitly captured within trends of provision is how the property market works across a wider economic area, and how businesses see LBW as a place to do business. Substitution effects across wider geographies as businesses seek cheaper locations and development viability and acceptance, such as collocation of industrial and residential, will continue to play a part in shaping demand and provision.

Q6 What evidence demonstrates that the potential shortfall in supply can be adequately made up by intensification? And how has the level (percentage) of intensification been justified? Has consideration been given as to how intensification should be measured and why has floorspace been chosen over employment density?

Council response

What evidence demonstrates that the potential shortfall in supply can be adequately made up by intensification?

Intensification is a natural market process which occurs as stock is renovated or replaced by new stock which more efficiently utilises an area. Examples of intensification include changes to buildings themselves such as the installation of mezzanines in existing premises, new forms of buildings such as underground warehousing and increasingly serious interest from developers in multi-storey industrial buildings, and multi-site redevelopment to increase the density of floorspace provision.

Intensification is being driven by the increase in land values as supply shrinks rapidly. London's Industrial Land Demand (2017) provides commentary on intensification and also notes that at a strategic level, studies have been commissioned on how to increase floorspace and jobs.

The Council has low vacancy levels in industrial stock and rental values are relatively high and increasing. These indicators indicate the imbalance of demand and supply, and a constrained supply position. Within Wandsworth, there is evidence of interest from potential applicants in intensifying sites through planning pre-applications submitted to the Council. This is reflected in recent studies which highlight the increasing commercial attractiveness of intensified industrial uses and building typologies which support these (London Industrial Land Supply and Economy Study (2016), London Industrial Land Demand Study (2016) Keep London Working (SEGRO, February 2017)).

In recognition of a constrained supply position, the LPEID supports intensification and provides a number of locations where this can happen. Policy EI2 Economic Use Intensification Areas (EUIA) states that redevelopment within these areas should provide a 25% plus increase in the amount of industrial (and office) floorspace. Policy EI3 and EI6 also sets out how industrial land could be intensified at Queenstown Road, Battersea SIL. Together these locations comprise 28.5 ha of industrial land provision in the borough, and potential to provide new accommodation for industrial function. As stated in the LPEID, paragraph 1.27 recognises that whilst there is not sufficient supply of land to meet forecast demand, the LPEID provides the opportunity to increase actual industrial floorspace to provide an opportunity to viably provide floorspace which is of better quality and more suited to modern industrial needs for the current Wandsworth economy.

And how has the level (percentage) of intensification been justified?

The level of intensification of industrial use is set out in the site allocation section of the LPEID for each relevant site. It ranges on individual sites between a net zero loss of industrial floorspace, by replacement of existing floorspace, to at least a 25% increase over existing floorspace.

The level of intensification in each site allocation was arrived at through a site-by-site consideration based on:

1. existing floor areas, building heights and use classes on site;
2. pre-application discussions;
3. permissioned development;
4. landowner or developer submissions to consultation; and
5. assessment of achievability of economic use development on the site
6. Public realm and design considerations including allowing for the provision of serviced yard space, taking into consideration existing public realm and improvements to public realm; particularly where there are potential conflicts between different transport modes or an unwelcoming environment, new infrastructure improvements including improved access arrangements.

Has consideration been given as to how intensification should be measured and why has floorspace been chosen over employment density?

Data on floorspace is available from and can be monitored over time through analysis of planning applications, as floor areas are required for planning applications whereas employment data is less reliably provided on planning application forms.

Any increase in floorspace is recorded by Wandsworth Council's Development Monitoring Database through the planning application process, enabling monitoring over time, and large

proposals of 1000m² or more are also recorded by the Greater London Authority through the London Development Database, enabling regional comparisons where necessary.

...and why has floorspace been chosen over employment density?

Current levels of provision (supply) are measured in terms of their existing space, so changes to provision of industry (and office) can be more easily considered in terms of land or floorspace. The forecast of net demand is also expressed as an area measurement.

If expressed in employment density then this would limit the future redevelopment of space for lower density uses such as logistics or factories with higher levels of automation, or away from a high employment density sector to another, thus limiting the flexibility to meet a wider range of user needs.

Q7 Is the land to be protected, as listed in criterion 3, clearly identifiable as there is no direct reference to numbers identified on the proposals map, figures, or a clearly delineated boundary for each of the identified areas? (figures 1, 2 and 3 show Economic Use Intensification Areas, the Strategic Industrial Location and Locally Significant Industrial Areas respectively but it is not clear the relationship of these figures with the policy or proposals map). Also what defines 'smaller industrial clusters?' to provide a clear indication of how a decision maker should react?

Council's response

The Council proposes to modify the plans identifying the SIL, LSIS and EUIA sites set out on page 24, 28 and 29 of the LPEID. The modification will include the figures 1, 2 and 3 will have a corresponding key for each plan identifying the correct site referred to within the policy. There will also be a direct reference within the related policy to the plan.

All sites will also be numbered on the Councils proposal map, which will be updated as part of the adoption of the LPEID.

Also what defines 'smaller industrial clusters?' to provide a clear indication of how a decision maker should react?

Smaller industrial clusters refers to those sites or clusters of sites currently in industrial use (B1c, B2, B8 or industrial *sui generis* uses) which are not designated as SIL, LSIA, Economic Use Intensification Areas, safeguarded wharves or New Covent Garden Market, and comprise the following:

- Sites or clusters which are in industrial use which lie within areas proposed for designation as Employment Protection Areas (EPA) in Policy E13. These make up the majority of the Borough's smaller industrial clusters.

Q8 Have the boundaries of the Strategic Industrial Location and Locally Significant Industrial Areas been robustly reviewed to ensure they are fully justified in meeting the most stringent level of protection (with no opportunity for release of this strategic reservoir)? What criteria have been used?

Council's response

Yes, the Council considers that the LPEID provides the most appropriate and robust strategy to protect the SIL areas and the SIL and LSIA boundaries were reviewed, as appropriate. This has been based on comprehensive, up to date evidence.

The boundaries of the SIL and LSIA's were reviewed in the Employment Land and Premises Study (August 2016) by AECOM where the ongoing suitability of all industrial sites or

clusters in employment use greater than 0.25 hectares or within employment designations or Town Centre areas were assessed. Survey work was primarily conducted through site visits and supported by desk based research. Site assessments were undertaken using the set of appraisal criteria listed within the GLA's Land for Industry and Transport Supplementary Planning Guidance (September 2012) Annex 3 with additional criteria based on AECOM's survey experience including:

- The potential for intensification of employment uses through better site configuration and layout or utilisation of space
- The predominant premises typologies to identify opportunities for intensification
- Physical site constraints
- Existence of granted or implemented Prior Approvals for office to residential development via Permitted Development Rights within SIL or LSIA, or for any other sensitive receptors (e.g. community uses, open space) within these locations.

Each site or cluster boundary was reviewed against this comprehensive list of appraisal criteria.

Q9 To what extent and what criteria have been used to review the boundaries of the LSIAs?

Council's response

The boundaries of the LSIAs were reviewed principally through the Employment Land and Premises Study (ELPS) (2016) by AECOM and subsequently by the Council during preparation of detailed policies, with the criteria used being those set out in the Land for Industry and Transport SPG (September 2012) and those appropriate in AECOM's experience as are listed in the Council's response to Q9.

At an individual LSIA level, consideration was given to the amendment of boundaries to exclude non-employment uses where these were deemed to compromise the integrity of the SIL or LSIA and its functionality, on the basis of AECOM's evidence presented in the ELPS including the field survey of these areas. Where non-employment uses such as retail and non-industrial *sui generis* were identified, these were typically not considered for exclusion on the basis of the possibility for such uses (non-residential only) to return to industrial use through market factors and in reflection of the limited potential for release of land designated for industrial use.

Consideration was also given to the potential for LSIAs to have capacity to provide intensified industrial uses, increased business floorspace and/or managed workspace for SME businesses. This was principally in recognition of the even balance of supply and demand identified in the ELPS including the 'high growth' scenario whereby net additional land and thus floorspace would be required to be provided over the Local Plan period in order to meet demand from businesses, including for appropriate/contemporary specification of premises which would likely be realised through intensification.

Q10 Is the Lydden Road LSIA clearly justified and effective? Will the proposed re-designation of part of it as an Economic Use Intensification Area add further pressure for the release of further land within it and undermine the residual area as a LSIA?

Council response

The Employment Land and Premises Study (ELPS) was commissioned by the Council to assess the quantity, quality and viability of the Borough's employment land to form an evidence base for the LPEID. The assessment included a site visit to 30 clusters combined with elements of desk research. As detailed in the ELPS under section R6 in order to meet wider strategic objectives the Council it suggested a change from industrial uses and re-designation for a mix of uses including employment at the Bendon Valley LSIA. This was also proposed alongside a policy to be introduced which introduces criteria on allowing this alternative use.

The Lydden Road LSIA provides employment floorspace for SMEs in a variety of accommodation. Industrial and industrial sui generis uses occupy the majority of sites within the LSIA, and low levels of vacancy are indicative of there being demand from businesses to operate from there. The proposed re-designation of part of it as an Economic Use Intensification Area reflects the scope for intensification of that part of the site.

The eastern portion of the area, the former Mecca bingo hall, is in long-term non-industrial use, is thus currently not complementary of being in an LSIA, and has no obvious prospect of returning to industrial use. The proposed re-designation of the site would prioritise the intensification and re-provision of purpose-built industrial floorspace on the southern side of Bendon Valley such as to ensure compatibility with uses to the north. The western portion of the site containing the Riverside Business Centre is mixed in character with intensification proposed to provide increased floorspace provision. Again, the northern portion of the site abutting the residual area of the Lydden Road LSIA is expected to contain industrial floorspace to provide continuity with existing uses to the north. The re-designation is intended to intensify economic use of the land and appropriate location and design of re-provided employment floorspace would not undermine the remaining LSIA or result in further pressure for release. The design principles of the site allocation and Policy EI5 (3) reiterates this position to ensure that the use does not conflict with surrounding uses which will be assessed at pre application and application stage.

Q11 In Criterion 4 what determines what are 'well located?' what considerations would be taken on board in determining whether a site is 'well located' and how would a decision maker know the considerations to apply?

Council response

Policy EI1 is a strategic policy which sets out the boroughs sustainable approach to economic growth. Policy EI1 is supported by policies EI2-EI9 of the LPEID. As this is a strategic policy the purpose of bullet point 4 is to give an overview and explain that policies EI3 sets out where the existing employment premises will be protected, it is not a specific criteria in policy EI1. Policy EI3 identifies where these sites are protected, which have already been assessed to be 'well located'.

Policy EI2 – Locations for new employment floorspace

Q12 This policy seeks to direct new employment floor space to the right locations focussing office accommodation in Town Centres, edge of centre, local centres, the CAZ and the Industrial Business Park and sites allocated in the SSAD in line with strategic policy EI1. Is this necessary given EI1?

Council response

LPEID Policy EI1 sets out the Borough's strategic approach to encouraging sustainable economic growth. This strategic policy sets out the locations where office development will be encouraged to support the sustainable economic growth of the borough. Policy EI2 follows that approach set out in Policy EI1. Policy EI2 explains in more detailed where new employment floorspace will be supported, and then sets out how this will be achieved. The

Council therefore considers it is necessary and important to set this out in both policies to ensure clarity regarding suitability for locations of office development when reading either policy.

Q13 In the context of criterion 2 does the fact that this would be an up to date plan not disengage the threshold, the assumption being that in the Plan making process consideration would be given to the impact of such developments outside of town centres or give the opportunity to consider the appropriateness of the town centre boundary? Paragraph 26 of the Framework also refers to a locally set threshold as the preference, is the threshold identified justified? A similar approach and criteria are identified in criterion 6 and similar questions regarding the justification of the threshold arise.

Council's response

The Council's original Core Strategy, adopted 2010 set out broad strategies for the local economy and for town centre growth and set out the town centre hierarchy (Policy PL6 and PL8), and contained a commitment to review housing targets and policies following publication of the London Plan 2011. In addition, the publication of the NPPF in 2012 meant that the Council was required to undertake a review of the Local Plan to ensure compliance with the NPPF. The Council carried out a partial review of reviewed the Core Strategy 2010 in respect of housing, along with other identified limited areas where revisions were necessary to comply with the NPPF, to produce the adopted Core Strategy 2016. As the Core evidence supporting retail and town centre policies was considered to be robust and looked ahead over a 5 year time period, (Retail and Town Centre Needs Assessment 2008 and 2012) a detailed review of town centre policies was not considered necessary at this time. However the NPPF approach to sequential testing and Retail Impact Assessment (RIA) was incorporated into the policies and it is considered that these continue to support the Council's approach to focussing development in the borough's town centres and other identified areas for town centre use (DMPD policies DMTS1-DMTS2). The RIA threshold is considered appropriate to the Council's strategic town centres and retail policy, and is of a scale to enable assessment of any trade draw to ensure one centre does not grow at the expense of another. It is not considered appropriate to review this threshold until the Council carries out the Full Review of the Local Plan, where the relevant evidence will be updated, the draft London Plan has progressed, and the Local Plan policies reviewed as whole. It will be relevant to consider or benchmark other thresholds in cooperation with other London boroughs, as there is an inter-relationship between the London town centres network across borough boundaries. Within this adopted Local Plan 2016 the Core Policy for Places PL8 Town and Local Centres sets out the Council's approach to the town centres being the main focus for office development. Policies DMTS1 Town centre uses and DMTS2 Out-of-centre development set out the Council position in further detail.

Within policy DMTS2 proposals which exceed the 2,500 sqms floorspace threshold as set out in the NPPF must also be accompanied by a Retail Impact Assessment. The threshold has not been analysed since the adopted plan as this was not part of the focussed LPEID review. The Council concurs with NPPF evidence and the policy relying on the 2500sqm to be applied in all circumstances.

The NPPF, the London Plan and the spatial strategy of the Local Plan all recognise the importance of town centres as the primary location for businesses. Policy EI2 follows that approach, seeking to focus new office development within town centres (and other appropriate locations listed for town centre uses such as the CAZ) and where there is limited capacity – on edge-of-centre sites.

Q14 In criterion 3 what defines 'areas lacking in local jobs'? How are the phrases 'such as' and 'near to' to be interpreted?

Council's response

Policy EI2 promotes positive sustainable economic development and sets out in detail locations for new employment floorspace.

The phrase 'areas lacking in local jobs' has been used as the intention of Policy EI2.2 is to support the Core Strategy Council regeneration initiatives, and support applications where employment jobs are lacking and to focus them in sustainable locations. Estate regeneration projects, with their relevant masterplans are underway in Clapham Junction (Winstanley Estate), and, Roehampton (Alton Estate) which has been highlighted in Policy EI2 as this is an area that also suffers from fewer public transport options.

The adopted Wandsworth Core Strategy sets out a Spatial Vision which includes the aim to have regeneration activity, including tackling pockets of deprivation, and lists Battersea and Roehampton as key areas for improvement. This spatial vision to tackle deprivation has been identified and a strategy for tackling regeneration has been set out in Policy PL13: Clapham junction and the adjoining area, and PL15: Roehampton.

The phrase 'such as' and 'near to' have been used in order not to be overly prescriptive so where evidenced, employment floorspace can be considered where there is a need in appropriate locations. The paragraph EI2.3 is a general statement, giving examples of where appropriate locations for additional employment floorspace may be acceptable. This has been interpreted through initiatives that the council has on estate regeneration and the Roehampton estate regeneration has been highlighted above.

Q15 In Economic Use Intensification Areas what is the evidence that leads to the intensification level being set at 25%? The level of intensification is identified in site allocations however in the submission draft policy the level of intensification is not identified, should a minimum level be set out in the policy and justified?

Council's response

The ELPS identifies areas that are suitable for intensification and recommends that where opportunities exist to intensify these industrial sites they should be allocated to increase industrial floorspace. The 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.

To help meet the need for business and industrial floorspace, and to support emerging and growing industries, Economic Use Intensification Areas have been identified. These areas have capacity to provide intensified industrial uses, increased business floorspace and/or managed workspace for SME businesses.

As per the response to Question 6, the 25% intensification level has been derived through pre-application enquiries and permissions, a general assessment of the type, scale and usage of the buildings and comparing this to the size of the overall site, with consideration of any landowner submissions including operational consolidation and other site constraints. The suitability and achievability of the sites for the level of intensification was assessed through this process.

The percentage increases for the identified sites together contribute to the overall borough potential supply of office space calculated in the Wandsworth Council Housing and

Economic Land Availability Assessment 2016–2031 (Submission Document Reference: SD/012), as set out in Tables 3 and 4 on pages 8 and 9 of the LPEID. These totals culminate in the 13,400m² shown as EUJA potential sites in Table 4, potential office supply, and contribute to the borough-wide total supply to meeting the high growth demand scenario of 71,000m² shown in Table 3.

Where a 25% uplift is sought in each relevant site allocation this will be taken as the starting point for planning discussions. It provides clarity to the developer from the outset to include within the design and any financial calculations at an early stage. As with all applications viability will be considered and levels of economic use intensification will be negotiated as part of a planning application and viability will be assessed, including possible scenario testing of varying degrees of intensification to determine the impact on an overall scheme taking into account the full policies of the Local Plan.

In summary, the 25% intensification is considered an achievable target across the relevant sites, and provides the minimum contribution to future industrial/office floorspace requirements to go towards meeting the future demand scenarios as part of a comprehensive strategy of viable intensification whilst maintaining the existing level of industrial and office floorspace.

Q16 Is there a target or overall assumed level of floor space that will come forward through the plan period from intensification? Is this to be monitored?

Council's response

The Proposed Monitoring Framework (Submission Document Reference: SD/016) sets out in Table 3 Indicator EM 06, which will monitor the amount of floorspace in LSIA, EUJA, SIL, EPA and IBP (and other) areas. The indicator does not specify intensification as a measure, but this would be able to be measured through floorspace and the areas of the sites identified.

Q17 Why has an increase in floorspace been chosen over an increase in employment density as the appropriate indicator?

Council's response

As set out in the answer to question 6 current levels of provision (supply) are measured in terms of their existing space, so changes to provision of industry (and office) can be more easily considered in terms of land or floorspace. The forecast of net demand is also expressed as an area measurement.

If expressed in employment density then this would limit the future redevelopment of space for lower density uses such as logistics or factories with higher levels of automation, or away from a high employment density sector to another, thus limiting the flexibility to meet a wider range of user needs.

Q18 What is the justification for redevelopment of sites in IBP parts of the SIL to have to have industrial uses (defined in Glossary as B1c, B2 and B8 and sui generis uses of an industrial character) on the ground floor if the existing use of the site is solely or predominantly B1a, when IBP Uses include research and development (B1b) and smaller scale offices (B1a)?

Council's response

The Wandsworth Employment Land and Premises Study (2016) 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 to help meet wider strategic objectives and promote higher density development at accessible locations, intensification to include 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. 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 +16.4ha (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.

As the IBP is within a SIL – a location identified as strategically important location for industry it is important to ensure that the appropriate level and balance of industrial and office floorspace development is allocated. The LPEID sets out that the SIL is not intended for large-scale office development and is not an appropriate location for any sort of residential use.

Therefore the Council must ensure that the industrial character of the area is not eroded, and developments in SIL must not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24 hour basis. Policy EI6 intends to support industrial businesses in the area and by requiring industrial on the ground floor ensures that where there is redevelopment that the character of the area is preserved, and increases industrial floorspace through the regeneration opportunities that occur by allowing small scale B1a and B1b in the area.

Policy EI3 – Protected employment land and premises

Q19 Is EI3 effective in providing the protection required under policy EI1?

Council's response

Yes. The Council considers that policy EI3 protects Strategic Industrial Land and Locally Significant Industrial Areas which have been identified through the work carried out by the ELPS. The study robustly assessed employment land and premises and identified areas to be retained and protected in order to achieve the strategic approach of policy EI1. Policy EI3 sets out these areas and premises that will be protected and identifies appropriate uses for each area.

Policy EI3 also provides additional sites through the Council's work on identifying and protecting EPAs. For appropriate areas and premises the policy allows a change of use subject to demonstrating that there is no demand for the premises, in accordance with policy EI7 which seeks a robust marketing exercise.

Q20 What is the justification for only B1a as an alternative use for premises that are in B1c, B2 B8 or industrial sui generis uses in Criterion 3a rather than also including B1b research and development?

Council's response

Policy EI3.3 allows a flexible approach when protecting employment areas and permits mixed use redevelopment including residential uses where appropriate. The overarching thrust of the policy is to protect existing, established industrial uses and premises in

economic uses. The policy takes an approach that if there is no demand for the existing industrial use that an alternative sought would be office floorspace in order to preserve the floorspace for local businesses.

'Office floorspace' within the defined glossary of the LPEID defines this as B1a but can also include B1b. Therefore, the policy protects the floorspace for continued employment use which can either be B1a or B1b.

Q21 In relation to Railway Arches 6c what is the test for demand for industrial premises or use - is it related to E17 and should that be referred to in order to make the policy effective?

Council's response

The test for demand in E13.6c is the test applied in E17. For consistency the Council propose the following modification to the text of Policy E13.6c:

'Non B class uses of railway arches will only be supported if there is no demand for B class use of the premises, in accordance with policy E17.'

Policy E14 – Affordable flexible and managed workplaces

Q22 Paragraph 154 of the Framework advises that Local Plans should address the spatial implications of economic, social and environmental change does criteria 1 of policy E14 meet this objective? If so how?

Council's response

The objective of criteria 1 is for development for economic uses to be expected to be leased at reasonable rents and in doing so the policy request that account is taken of the Code for Leasing and Business premises. This approach offers flexibility by using the words 'taking account of' but uses the Code for Leasing and Business Premises as its benchmark for assessing rent levels. The Council considers this to be a clear policy on how a decision maker should react to a development proposal, and thus provides an indication of the Council's desire to achieve reasonable rents. Therefore the Council considers that the Local Plan meet the objectives of Paragraph 154 of the NPPF.

By achieving realistic rents this policy seeks to ensure businesses are able to afford to operate from the borough, in particular to help meet the need for SMEs, and to support emerging and growing industries which form a key part of the Wandsworth economy. Small firms of 1-9 employees make up over 90% of businesses in the borough highlighting the importance of realistic rents. It is important to recognise that such a community needs to be nurtured. This means providing the kind of space that will encourage such businesses to thrive premises that are too expensive will discourage growth in the SME sector.

Q23 What is the justification to seek to control rent agreements through planning policy? Where is the evidence to justify such control? Have the implications of such control been tested against viability and deliverability? How will this be achieved in practice? Is the criterion sufficiently future proofed as it refers to code for leasing Business Premises in England and Wales 2007 but not any potential future update?

Council response

What is the justification to seek to control rent agreements through planning policy? Where is the evidence to justify such control?

The ELPS highlights that start up and small businesses provide an important source of economic growth and prosperity to the borough. Table 5.2 shows that over half (50.7%) of office units in Wandsworth are under 250m² in size, representing 8% of total stock. The

ELPS suggest that current occupiers within Wandsworth may struggle to find premises suitable for their needs and may therefore seek alternatives outside the Borough. This is further substantiated by the GLA London Office Policy Review (2017) which finds that the needs of smaller occupier and those seeking space at rents they can afford generally agglomerate in secondary space and in the CAZ fringe. It is in these areas that the viability of such firms is being threatened by the growing core area, and by conversions from office to higher value residential use. As stated in the GLAs 'Artists' workspace study, 2014 artists are among the lowest earners, so it is crucial to keep the cost of workspace low. Most studio providers operate within a complex web of funding streams as well as public investment ranging from grants to Section 106 allocations in order to maintain low rents.

By controlling rent agreements this will support a more diverse business base to emerge and strength which will support SMEs, particularly start up business and support investment in area where certain business types and sizes may be priced out.

Have the implications of such control been tested against viability and deliverability?

The justification and evidence for rent control has previously been examined as part of the Wandsworth Core Strategy Hearings. The Inspector at the time asked the following question (EX2-05 Wandsworth Council statement issue 5);

Policy DMI4 – Provision of flexible employment floorspace -How are the provisions relating to realistic rents, flexible leasing arrangements and building management to be secured through the planning process?

As part of the hearing session this issue was discussed and the Council considered that rents, leasing arrangement and building management are sought in DMPD Policy DMI4 and would be agreed by negotiation. Negotiated agreements will be entered into via a S106/legal agreement. The Inspector was satisfied with the outcome of the Hearing and recommended approval to the Wandsworth Local Plan with no proposed modifications on this point. The policy was adopted in 2016 and has been operating well and the Council considers that this policy is deliverable.

How will this be achieved in practice?

Through negotiated agreements that will be entered into via S106/legal agreements.

Is the criterion sufficiently future proofed as it refers to code for leasing Business Premises in England and Wales 2007 but not any potential future update?

The Code encourages the property industry to address issues of inflexibility in commercial lease terms and for the industry to regulate itself as opposed to have government intervention. The 2007 edition is the third edition and remains the current code the Council will seek for the provision of all development for economic uses.

Q24 What is the justification for the 1,000sqm threshold for the delivery of affordable, flexible and managed workspaces? Have the implications of such requirements on viability been assessed?

Council response

As set out in the Town and Country Planning (Development Management Procedure) 2015 for major developments, Wandsworth Borough Council applies a 1000sqm threshold for floorspace. This 1000sqm threshold has been taken as the starting point for applying policy

E14. In order to maximise the benefit of managed workspace, providers generally seek floorspace over 400sqm.

The Council considers that the 1000sqm threshold is an accommodating approach as a development of this size should easily have capacity for the general minimum of 400sqm managed workspace which is sought.

Policy E14 allows a flexible approach for ensuring that affordable, flexible and managed workspace is achieved. The policy in the first place seeks managed, flexible range of unit sizes or if this is not achievable, if suitable evidence can be submitted, then the Council will seek affordable rent in perpetuity.

Through the planning application process if there are implications on viability this will be discussed and negotiated as part of the initial scheme.

Q25 Would it be appropriate to include a definition of 'affordable workspace' to make the policy effective?

Council Response

Policy E14 sets out how Affordable Workspace can be delivered through a variety of methods which can include; rents below market value, managed workspace, co-working space or providing a range of unit sizes. It is considered that a flexible approach to securing affordable workspace is the most appropriate in order to provide the premises that businesses need to operate, and this approach should be pursued.

There has been a significant expansion of managed workspaces in recent years and these premises can provide a wide range of leasing arrangements, flexible practises, business support. There is a clear demand for managed workspace and will encourage investment in modern, flexible premises that meet the needs of a wide variety of businesses including the SME firms that make up the significant majority of businesses in the borough.

However, it is recognised that this type of space may not always be practical, or suitable for the premise and may not provide sufficient affordability and business support features and as an alternative, it is considered appropriate to secure a fixed quantity of workspace at a specified affordable rate through a s106 agreement. As average rental rates for offices and industrial uses have increased significantly in recent year in Wandsworth policy E14 proposes that 10% of gross economic floorspace is capped at a rate of 20% less than the prevailing market rate.

The Council therefore considers that by defining 'affordable workspace' might be too restrictive when applying the policy.

Policy E15 – Requirements for new employment development

Q26 What is the justification for the policy and the level of detail for the requirements of new employment development?

Council Response

The Council considers that it is important to clearly identify the form of development that would secure permission and that new employment floorspace must be fit for purpose and meets the needs of the wide variety of businesses that operate from the borough or may seek to locate here. The Council is aware that Local Plan policies should not be overly restrictive, however it is important to ensure that details such as where mixed use sites are developed they should be designed in a way that uses complement rather than compete with each other.

In the context of a balanced demand for office floorspace and industrial land and premises forecasted over the Local Plan period, as set out within the Employment Land and Premises Study (ELPS) (August 2016), it is crucial that the design of buildings for B use are of a specification to be attractive to businesses in order to maximise take up. New employment space should, both externally and internally, be designed appropriately for their function, whilst also designed to contribute to an attractive, safe and active environment that is sustainable for the future. Council's policy EI5 seeks to do this.

The requirements listed in criterion 1 of Policy EI5 are considered to be of appropriate detail that, when in determination of individual applications the policy, will enable the Council to robustly review the accordence of proposals for new employment space against these requirements, whilst retaining an appropriate level of flexibility not to preclude development being realised by requirements being too onerous or specific.

Criterion 2 is intended to set out additional requirements applying specifically to new industrial employment floorspace. Industrial premises which are vacant as a result of their quality and appropriateness can present a risk to the integrity of employment areas given the ability of non-industrial occupiers to make the case for occupying such premises/land on the grounds of lack of evidence of enquiries/demand and thus limited prospect of re-use. The potential consequence of this is that sensitive receptors (e.g. residential and community primarily) introduced can affect the ability of neighbouring employment uses to continue functioning and spatial integrity. The additional requirements are considered appropriate to help ensure the provision of premises that are suitable for business needs and preventing potential unintended release of industrial land in this way. A minimum internal building height of 3.35m aligns with recommended standards for industrial floorspace and with typical new provision of small units coming onto the market.

The requirements of criterion 3 are considered to be well-justified given LPEID policy EI2 regarding the designation of Economic Use Intensification Areas where mixed-use developments are required to intensify employment uses compared to that currently on-site, and thus the incidence of such proposals will likely increase. This is including through a continuation of a growing trend for such mixing of uses that can be noted elsewhere in London (Industrial Intensification Primer (GLA, 2017), Park Royal Intensification Study (GLA, 2017)) and in emerging planning policy (Draft London Plan (GLA, 2017)).

Q27 Do these requirements place undue burdens on developers given the advice in paragraph 173 of the Framework that development should not be subject to such policy burdens that their ability to be developed is viably threatened? Has the impact on viability been assessed?

Council response

The intention of the policy is to ensure that uses are enabled to work alongside each other not place undue burdens to threaten development. The requirements set out in the policy regarding design are standard requirements that most economic developments would require to operate at fully and therefore the policy is ensuring that the developer takes this on board at the beginning to ensure costs are kept to a minimal. The policy encourages more efficient use of the site and advocates vertical stacking of economic uses. The Council considers that there would not be any significant abnormal costs incurred by the developer, which would greatly limit development viability/commercial returns as a result of policy EI5.

Q28 Are the control of lease terms and rent levels identified at point 4 an excessive burden on business? Are they matters appropriate to control through planning policy and in line with national policy?

Council's response

Please see response to question 23

Policy EI6 – Managing land for industry and distribution

Q29 Would it be appropriate to give an indication of 'small-scale' in criterion 5 to make the policy effective?

Council response

The background text at paragraph 2.27 gives instances where small-scale non-industrial uses may be appropriate. The Council considers that it is appropriate to contain these examples in the supporting text as it is the intention of the Council to give an indication of situations where this might be applied and not an exhaustive list of instances.

Q30 What would define a 'significant industrial function' for the Industrial Business Park in criterion 6? Is such a definition required to make the policy effective and provide a clear indication of how a decision maker should react?

Council Response

The IBP designation is considered an area that has the capacity to increase the amount of industrial floorspace as well as providing increased quantities of business floorspace. The IBP area has been identified due to its close proximity to central London and it will form part of the emerging digital and creative cluster around Battersea Power Station. This flexibility has been introduced in the SIL area to ensure that current sites have the opportunity to be redeveloped (by allowing small scale SME use), ensuring that sites do not become vacant and will also improve the quality of stock available in the SIL.

The Council's wording in EI6.6 '*these areas should retain a significant industrial function*' will take into account an increased capacity for industrial floorspace which also considers adequate servicing yard/area space, and other factors which relate to the ongoing functionality of the area. The wording of the policy will include ensuring that the development does not dilute the industrial function or set an unacceptable precedent to erode the industrial function or character of the area and that the industrial capacity is retained. The Council will ensure that industrial developments can continue to operate successfully and thereby securing their long-term viability.

The Council considers that by defining 'significant industrial function' this approach may restrict future opportunities when developing more intensive economic uses in the IBP and considers a definition not to be required.

As part of considering increasing the capacity for industrial floorspace in the IBP the Council would consider a collaborative masterplanning process with developers and the GLA to maximise the opportunity of the IBP.

Policy EI7 - Redundancy of employment premises

Q31 What is the justification for the 18 month time period?

Council response

The 18 month marketing period has proved over time through the adopted Local Plan 2016 policy DMI2 Mixed Use Former Industrial Areas to be effective. This policy criterion was subject to the Local Plan examination hearings for policy DMI2. The Inspector was satisfied with the outcome of the hearings and this policy has been operating effectively since adoption of the policy. The 18 month period gives adequate time for full and proper marketing, to prevent inappropriate interest in the highest value use in the shortest time

without testing the market. This duration allows adequate time for an active, comprehensive marketing campaign, viewing, expressions of interest, negotiation of lease terms and possible viability assessments addressing refurbishments or modernisation. The inclusion of this requirement in policy EI7 helps provide clarification for applicants and assists in speeding up the process of determining planning applications.

Q32 Does the word 'convincing' in the policy add ambiguity and thereby reduce its effectiveness?

Council response

The council acknowledges this point that the word 'convincing' could be misconstrued.

The purpose of the word in the policy is to ensure that rigorous marketing has been carried out by the applicant and it can be proven to the Council. The word justifiable is considered to be more appropriate to demonstrate the requirement and would suggest a modification to the text.

Q33 What is the justification for the threshold of 1,000 sq m of office floorspace to require evidence to demonstrate it is not feasible or viable to adapt as smaller business units?

Council response

The NLP report 2015 – 'Workspace Futures' has highlighted how the office market has changed over the years and the degree of flexibility and varying types of work spaces that cater for a diverse range of businesses and organisations. *'Premises may be considered important to protect for the provision of space to support start-up and growth businesses.'* Given the strong demand for SME workspace in Wandsworth, larger office premises should in most instances find demand for occupancy for smaller firms, where it is feasible and viable. Therefore the intention of policy EI7 is to ensure that existing office premises have been robustly assessed to ensure that options for smaller business units have been tested.

As set out in the Mayor of London's 'Creating open workspace' 2015 compared to other property providers, the co-working business model depends on having a relatively high volume of paying users. The number of users required to achieve break even is usually higher than a serviced office although the set up costs and capital build costs can be lower. The space must be big enough to accommodate the high volume of uses. Viable and financially self sufficient co-working spaces are typically around 400sqm or more.

The Council considers that the 1000sqm threshold, which is in line with the threshold for major applications, is a justifiable approach to ensure provision of smaller businesses. This level of threshold takes into consideration the general sought after minimum floorspace (400sqm circa) for managed workspace and this permits a certain flexibility in accommodating smaller units.

Q34 Why is it not appropriate to also include a preference for B1b which is not included in the definition of industrial uses?

Council response

The Policy EI7 sets out the alternative uses to industrial once it has been demonstrated there is no demand. The policy states there is a preference for B1 office floorspace. Within the glossary of terms B1 office floorspace is defined as 'usually B1a (office) but can also include B1b (research and development). Also referred to as business floorspace.

Q35 What is the justification for the sequential approach to alternative uses at point 5?

Council response

Policy EI7 protects existing employment premises (as identified in policy EI3) for future use as an employment designation. The Council considers that policy EI7 adopts a flexible approach for applications where it has been demonstrated that there is no demand for the premises to continue in B1a office use.

The ELPS identified that sectors within the creative economies are growing strongly in Wandsworth. Conversely as noted in the Artists Workspace Study, GLA 2014 there has been significant losses of cultural workspaces across London in place making and regeneration initiatives. There is a growing need and demand to identify sites for cultural and community uses.

The Lombard Road/ Focal Point SPD sets out the spatial vision for the Lombard Road area, including the provision of cultural facilities and creative workspace. Community and cultural economies are prioritised as these are sought after uses within Wandsworth and the wider area.

The Councils spatial vision and strategic objectives for Wandsworth include:

- Investment in public services throughout the borough as opportunities arise.
- Good access to wider opportunities outside the borough for jobs and services particularly in central London and,
- Provide the needs of and improve access to educational, social, welfare, health, community, police and prison services.

Due to the demand and need for cultural and community uses within the borough this use will be a priority. New cultural spaces will continue to be sought and encouraged in line with adopted Local Plan policy, with a preference for these in accessible and town centre locations and as part of established and emerging night time economics.

The preference is then to keep employment sites in some form of employment generating use (as they are crucial in supporting the borough's economy) which there is limited stock in the supply of land and premises in economic use. In order to allow the character of the area to be predominately for economic uses an employment generating use will be sought.

Lastly, the Council will consider a mixed use site which must still contain an employment generating use. This will be negotiated at application stage.

Policy EI8 - Waste

Q36 Paragraph 2.39 indicates that safeguarding existing sites dealing with waste services but which could be re-orientated and consolidated to provide waste management capacity within the SIL gives a total of 1.69 ha; where is the justification and evidence for this? How is the figure arrived at?

Q37 Paragraph 2.39 then states that 1.69 ha is sufficient to process 218,000 tonnes. However, based on the GLA ratio of 80,000 tonnes per ha, which is what is suggested earlier in the paragraph, this would only equate to 135,200 tonnes insufficient to meet the residual apportionment figure of 165, 000 tonnes or 2.05 ha? Can you clarify?

Council response to Q36 and 37

Waste policy has not been reviewed in the LPEID as part of the review of the employment and industry policies of the adopted Local Plan 2016. This was due to the likely future revision to the waste apportionment figure changing as part of the GLA's review London Plan and the timing of that meaning review being more appropriate as part of a future full Local Plan review. Also, work is ongoing with the Western Riverside Waste Authority Boroughs on updating the evidence base for waste sites and the capacity to meet the London Plan waste apportionment across this area. This work commenced with the intension to update the policies and site allocations as part of the full review of the Local Plan,

The approach taken to include the waste policies in the LPEID is because the waste policies of the adopted Local Plan 2016 are included within the adopted industry and waste chapter, and relevant linked policies of the Core Strategy. Therefore, instead of a comprehensive review of the waste policies, the text of the relevant part of the policies are transferred over to the LPEID with minimal changes to reflect updated policy numbering but otherwise retaining the adopted policy wording.

This stance was indicated in the Local Plan Employment and Industry review – Regulation 18 Statement of consultation (ID Ref no SD-006); Policy Options consultation Document (October 2016) Paragraphs 8.97- 8.99 (pg54) (ID Ref no (SD-032); the Policy Options statement of consultation Paragraph 3.19 (pg 8) (ID Ref no SD-005) and in response to comments in the Proposed Submission version consultation report (ID Ref no SD-004). Section 2.8 waste, including Policy EI8 is not subject to review and is the adopted position as set out in the Local Plan 2016.

For clarification Paragraph 2.39, is the same a paragraph 4.71 of the Adopted Core Strategy Local Plan. The 1.69ha figure is the sum of two waste site land areas identified on page 225 of the Site Specific Allocations Document (ID Ref no SD-021), the Biffa Waste Services and Cory Environmental waste transfer site. These two sites, together with the remaining site on the Pensbury Place Waste Management Site (SSAD Allocation 2.1.33, Pg78) make up part of the total throughput figure needed to meet the London Plan Waste apportionment figure. The following table sets out the key figures (an expanded version of the table contained on Pg 253 of the SSAD):

Site	Waste site map reference	Site (Ha)	Site tonnage throughput	Future tonnage towards apportionment figure over the plan period (tonnes per annum)
European Waste Recycling (Pensbury Place Waste Management Site) existing waste management site	2	0.8	64,000 ¹	280,000
Biffa Waste	2	0.18	23,261 ²	

¹ 0.8ha x 80,000 (the 80,000 figure was a GLA advisory figure used as the basis for the London Waste Apportionment Study 2006 Prepared by Jacobs Babtie for the Greater London Authority December for average waste management facility throughput).

Services (Pensbury Place Waste Management Site) Not classed as waste management site				
Cory Environmental Waste Transfer Site (Pensbury Place Waste Management Site) not classed as waste management site	2	1.51	195,137 ²	

This approach was discussed and accepted as part of the process of consultation with the GLA and found sound as part of the Local Plan adoption 2016. This approach and information will be reviewed and updated as part of future joint evidence work with the Western Riverside Waste Authority boroughs in a joint Waste technical paper to be used as evidence for the future full review of the Local Plan.,

Policy EI9 – Protected Wharves

Q38 Has there been any changes in circumstances since the DMPD and in particular policy DMI 3(c) was found sound?

Council response

No. It is understood that the GLA will be shortly commencing a safeguarded wharves review and the Council will be a key stakeholder in any future consultation. There have been no reviews of safeguarded wharves since the Local Plan 2016 was adopted.

Issue 4: Is the Area Spatial Strategy for Wandle Delta consistent with the SSAD and does it support the CS and DMPD?

Q39 Is the Area Spatial Strategy for Wandle Delta consistent with the SSAD and does it support the CS and DMPD?

Council's response

Yes. The Council considers that the Area Spatial Strategy for the Wandle Delta is consistent with the SSAD and supports the Core Strategy and Development Management Policies Document. The Area Spatial Strategy supports and considers the strategic objectives of the CS in particular the environmental objectives and policy PL12 which sets out the vision for Central Wandsworth and the Wandle Delta. Some of which include;

‘Secure sustainable development in the borough to help tackle climate change’ and ‘the planned consolidation, intensification of industrial land will increase capacity for industrial

² $0.18 \times 129,230 + 1.51 \times 129,230 = 218,398 + 64,000 = \text{Circa } 280,000$. The Biffa and Cory site throughput was multiplied by 129,230 as this was based on evidence of actual throughput of Smugglers Way Materials Recycling Facility (waste site ref no 4) which was 84,000/0.65ha. This figure was used instead of the 80,000 figure for these sites as it was demonstrated that to the GLA that they formed part of the wider Pensbury place site and further efficiencies (reorientation/consolidation) could be made as part of a larger site.

uses'. To achieve the objectives the Area Spatial Strategy Investment in the area will present opportunities to improve permeability across the Delta and improve walking and cycling routes. New development will enable improvements to biodiversity and ecology, create a more welcoming public realm and better road links around the area and Wandsworth Town Centre.

Issue 5: Are the site allocations justified, effective, deliverable within the plan period and consistent with national policy?

Q39 Do the site allocations contain sufficient detail on form, scale, access and quantum of development?

Council response

The Council considers that there is sufficient detail within the site allocations section of the LPEID, which follows the format of the adopted site specific allocation document in setting requirements for sites.

A proposed modification has been tabled in the LPEID to introduce wording to relevant site allocations to say that at least a 25% increase in the existing amount of floorspace will be required.

Form, scale and access will be considered at the pre-application stage in accordance with the guiding principles of the site allocation and policy requirements.

Q40 Site 42A is in EUIA map 12 but why does that not also require a 25% increase in the industrial floorspace?

Council response

Site 42A, The Frogmore Complex, is in Council use and primarily used for vehicle parking with supporting office floorspace. Consolidation of operations is planned for as part of wider operational requirements. A 25% increase in floorspace is not considered an appropriate as the Council's use of the site is most appropriately categorised as a non-core industrial use, given it's utility-like functions.

Q41 The allocations include identification of storey heights. What criteria have been used to identify the definition of tall in respect of the different sites? What is the status of the Stage 2 Urban Design Study, referred to in the allocations?

Council response

The Stage 2 Urban Design Study is an adopted study which builds on work which was undertaken as part of the Stage 1 Urban Design Statement which identifies broad areas where tall buildings may be appropriate. The Stage 2 Urban Design Study further tests and refines the assessment of those areas where tall buildings may be appropriate, to provide locational guidance for tall building development within these broad locations. The sites where storey heights have been identified and criteria applied to different sites to identify a definition of tall has been based on the Stage 2 Urban Design Study.

Q42 Are the site allocations 42A, B, C and D within the Wandle Delta Area Spatial Strategy area?

Council response

Yes the site allocations 42A, B, C and D are all within the Wandle Delta Area Spatial Strategy area.

MODIFICATION

Discrepancies and clarification

Q. In policy EI3, employment protection areas, the names in the bullet point list do not correspond with the titles of the plans identifying the sites which could lead to confusion and the policy being ineffective.

Council's response

The Council proposes to modify the plans identifying the employment protection area sites. Figures 4, 5 and 6 will be modified and have a corresponding key for each plan which identifies the correct site.

All EPA sites will be numbered on the Councils proposals map and will also be updated to include the names of the sites. For clarity figures 1, 2 and 3 the site will also be added to the proposal maps and figures included in the names.

Q. The Area Spatial Strategy covers the Wandle Delta which appears to replace the area spatial strategies for 'land between Armoury Way and the Railway' and for the 'Wandle Delta, land north of the Railway'. Whilst it is noted at paragraph 1.46 that the LPEID will replace these and they will be deleted from the relevant documents there is no suggested amendment to figure 1.3 of the SSAD – Spatial Strategy Areas which maintains reference to these two area spatial strategies identifying their broad location?

Council response

An amended version of the Adopted Local Plan: Core Strategy, Development Management Policies and SSAD are being kept up-to-date with required changes. As part of the update figure 1.3 of the SSAD will be modified to reflect the changes to the area spatial strategy. The current tracked change versions will be modified upon adoption.

Q. The existing SSAD area strategies identify the sites covered by the strategy by reference to numbering on the illustrative drawing for the area, such numbering is not included in the new Wandle delta spatial strategy why not? Does this make identification of which sites it relates to ambiguous? E.g. Are those sites formerly numbered as 3.4 – 3.12 in the existing SSAD now incorporated within the expanded Wandle Delta Area Spatial Strategy or are they outside this area? I note the numbering has changed.

Council response

Please see response to question 42. These sites listed are part of the Wandle Delta Area Spatial Strategy

Q. To which Area Spatial Strategy do sites 35A and 99F relate if any? (Site 35A - Central Wandsworth Area Spatial Strategy? and site 99F - Other Sites?) Should these be clarified in the document and how they will be integrated with the existing SSAD?

Council response

Site 35a is referenced within the Site Allocation section of the LPEID as being within the Central Wandsworth Area Spatial Strategy. Site 99f is not identified within an area spatial strategy but considered that it will contribute towards the area of the central Wandsworth Area Spatial Strategy and benefits from the objectives.

If you have any queries or require any further information on this response, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Stone', with a horizontal line drawn through the middle of the signature.

John Stone
Head of Planning and Transport Strategy