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## Wandsworth Council

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Our ref: LBW-PR-004  
Your ref: REP-1041290-001  
Date: 24 January 2018

Dear Mr Stone

**Wandsworth Council – Examination of Local Plan Employment and Industry  
Document (LPEID)  
Council's response to Letter of Representations from Turley – REP-1041290-001**

Thank you for the opportunity to respond to the comments set out in letter from Turley titled REP-1041290-001.

The Council's response is set out below.

The Council's response to ID/005 (ID Ref no: LBW-PR-002) sets out a detailed response to the Council's consideration of the Draft London Plan and corresponding weighting. The Council is of the view that very limited weight should be given to the Draft London Plan at this stage. The Plan still has to go through the public consultation process, and the adoption of Wandsworth's LPEID could be approximately 1 year prior to the adoption of the London Plan. The legal requirement and soundness test in relation to the London Plan is whether the LPEID is 'in general conformity' with the existing adopted London Plan. The GLA has been engaged throughout the consultation process of the LPEID and have not objected to the LPEID regarding conformity with the adopted London Plan.

The new SHLAA evidence base for the Draft new London Plan has been produced, which when adopted through the new London Plan will form the new housing target for the Borough. The Council will take into account the future new housing target to inform policy making in the future full review of the Local Plan. As can be demonstrated in previous and in the latest Authority Monitoring Report (Position at 31 March 2017) the Council meets its housing target and can demonstrate a 5 year housing supply. See the latest trajectory here:

[http://www.wandsworth.gov.uk/downloads/file/12984/housing\\_trajectory\\_and\\_summary\\_tables\\_201617](http://www.wandsworth.gov.uk/downloads/file/12984/housing_trajectory_and_summary_tables_201617)

The adopted housing target does not take into account the housing potential of the Employment Protection Areas as these areas were not previously identified. They have however been included as part of the SHLAA process for the draft new target. The Jaggard Way site was never identified as a site with housing potential until it was considered as an Employment Protection Area designation. It was also never identified in any of the boroughs 'call for sites' consultations as part of the adopted Local Plan 2016 or as part of the LPEID. It is considered that by designating Jaggard Way as an Employment Protection Area the LPEID contributes to the overall housing target to accommodate the additional housing as set out in the new Draft London Plan. The main thrust of Policy EI3 (Employment Protection Areas) is to protect existing employment uses and it is considered that only upon demonstrating a lack of demand that development for an alternative use be considered. However, the policy also provides flexibility to enable the consideration of residential use as part of mixed use development as long as it is not to the detriment of providing existing industrial and office floorspace if it can be successfully accommodated, in accordance with Policy EI5.

The Council considers that the draft new housing target should not be used as the basis for scrutinising proposed housing numbers at this current time. LPEID Policy EI3 has identified a number of Employment Protection Area sites set out in EI3 which have been taken into account in the latest SHLAA process as having mixed use development site potential.

Although the Council provisionally forecasts that it could meet the Draft new London Plan housing target it has concerns about the small sites methodology and its high risk strategy for overall delivery. The Council, alongside many other London Boroughs, will be challenging and objecting to the revised housing target and will be responding to the Draft new London Plan consultation, raising significant concerns regarding the methodology and assumptions made in deriving the new target.

Whilst it is acknowledged in paragraphs 1.25 -1.27 of the LPEID that there is not a sufficient supply of industrial land to meet the total forecast demand for industrial land the LPEID sets out an approach to protect existing and intensify industrial floorspace including the protection of its existing important local smaller industrial areas as set out in Policy EI3 as Employment Protection Areas.

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 new London Plan, 2017) and supporting documents (London Industrial Land Demand, 2017) seek to address. The Draft new London Plan, 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. In applying this in planning policy the Draft new 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. Boroughs in the 'Provide Capacity' category are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest. These boroughs should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water. The Council considers the protectionist approach of industrial floorspace

is integral to the Council's Employment and Industry Local Plan review and considers the LPEID approach to be in accordance with the adopted and Draft new London Plan.

The Council acknowledges the importance of and requirement to meet housing targets and has set out a reasoned policy approach which will contribute to the future Draft new London Plan Housing target and crucially not to the detriment of the boroughs employment floorspace supply.

With regard to the Draft new London Plan, 'Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function', the Council generally supports this policy approach and considers the LPEID in conformity. In paragraph 6.7.2 the Draft new London Plan highlights that the majority of land in SILs should be retained and intensified and in selected parts of SILs and LSIAs there is scope for consolidation. The LPEID has reviewed these designations and has identified areas that could benefit from consolidation (identified in Policy E12 as Economic Use Intensification Areas), thus improving the employment offer and increasing housing supply. This approach forms part of an overall consolidated approach with additional protection for EPAs forming part of that overall consideration for assessing the Boroughs industrial supply demand.

The LPEID sets out an approach to protecting what the Draft new London Plan would categorise as 'Non-Designated Industrial Sites' (Employment Protection Areas – LPEID Policy E13) where they are in appropriate locations and form a cluster which enables benefits from agglomeration effects, supplying each other and realising economies of scale for servicing and other operational requirements. This approach was based on evidence provided in the Borough's Employment Land and Premises Study 2016 which assessed the quantity, quality and viability of the Borough's employment land to support the LPEID. The ELPS has been used by the Council to inform its approach to the provision, protection, release and enhancement of employment land and premises.

LPEID Policy E13 requires evidence of demand unless a mixed use development is proposed which results in no net loss of existing office and industrial floorspace. The continued demand for industrial premises and the limitations on supply of industrial land require the protection of smaller industrial areas and premises, as identified in Policy E13. This approach is evidence based and considered to be in accordance with Draft new London Policy E7.

The ELPS identifies in para 8.3.40 that industrial employment land not designated for SIL or LSIA but still provide a significant function to the borough's economy in meeting a local business need should be protected. The study recommends a criteria based policy approach to ensure that certain 'non-designated sites' are appropriately protected to avoid an over release of industrial land. This approach has been applied in LPEID Policy E13.

The Draft new London Plan Policy E7 supports mixed use or residential proposals in Non-Designated Industrial Sites (outside of SIL and LSIAs), subject to certain criteria such as evidence of demand. This proactive approach takes into consideration vacancy rates to ensure efficient functioning of the industrial market. As identified in the study Jaggard Way has been identified as an area which is an established, well performing (with no evidence of vacant units) local SME employment area and industrial and office premises location and provides a substantial amount of floorspace for local businesses and is therefore vital in supporting the borough's economy.

It is considered that the local evidence for the Borough justifies the approach set out in Policy EI3 which requires no net loss of office and industrial in mixed use schemes. It is considered crucial to protect the existing level of employment uses to supplement other designated SIL and LSIA sites. Policy EI3 of the LPEID aims to protect these crucial areas for economic use and Jaggard Way has therefore been identified as an Employment Protection Area.

It is also regarded by the Council that whilst the Draft new London Plan has new emerging evidence, until this has been robustly tested through consultation no significant material weight should be applied. The LPEID actively encourages sustainable economic growth in Wandsworth and takes a balanced approach, seeking 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 meet the needs of the local economy including contributing to meeting housing targets. The Council considers this is in accordance with the general approach of the Draft new London Plan.

In relation to these comments it is also considered appropriate to draw your attention to a planning application which is being considered by Planning Application Committee on the 25<sup>th</sup> January with an officer recommendation to refuse a mixed use scheme on Jaggard Way. The report places emphasis on the protection of existing employment land in accordance with the LPEID and considers the importance of the Borough's need to protect its industrial floorspace. Details of which can be found via the following link:

<https://democracy.wandsworth.gov.uk/documents/s55227/3%202017-2678%20-%20Land%20including%20units%20on%20Jaggard%20Way%20SW12%208SG.pdf>

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

Yours sincerely



**John Stone**  
Head of Planning and Transport Strategy