



The Planning Inspectorate

Report to Wandsworth Council

by Kenneth Stone BSc (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Date: 31 August 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Wandsworth Local Plan: Employment and Industry Document

The Plan was submitted for examination on 13 October 2017

The examination hearings were held on 21 and 22 February 2018

File Ref: PINS/H5960/429/9

Abbreviations used in this report

AA	Appropriate Assessment
CS	Core Strategy
CAZ	Central Activities Zone
DMPD	Development Management Policies Document
DtC	Duty to Co-operate
EPA	Employment Protection Area
EUIA	Economic Use Intensification Area
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
IBP	Industrial Business Park
LDS	Local Development Scheme
LP	Local Plan
LPEID	Local Plan: Employment and Industry Document
LSIA	Locally Significant Industrial Area
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SIL	Strategic Industrial Land
SME	Small and Medium-sized Enterprise
SPD	Supplementary Planning Document
SSAD	Site Specific Allocations Document
VNEB	Vauxhall Nine Elms Battersea Opportunity Area
WRWA	Western Riverside Waste Authority

Non-Technical Summary

This report concludes that the Wandsworth Local Plan: Employment and Industry Document (LPEID) provides an appropriate basis for the planning of employment and industry in the Borough, provided that a number of main modifications [MMs] are made to it. Wandsworth Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council, and were subject to public consultation over a period that extended beyond six weeks. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Changes to the text of a number of policies to ensure their clear interpretation and implementation so that they are effective and consistent with national policy.
- Changes to the Area Spatial Strategy for Wandle Delta, including the key diagram and justification to provide clarity and consistency with the Wandsworth Local Plan Site Specific Allocations Document (2016) (SSAD).
- Changes to various site allocations to clarify particular matters which are necessary to ensure the allocations provide effective detail on form, scale and quantum of development.

Introduction

1. This report contains my assessment of the Wandsworth Local Plan: Employment and Industry Document (LPEID) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (March 2012) (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. In July 2018 a revised National Planning Policy Framework was published. However, paragraph 214 of this document makes clear that the previous Framework (ie that of March 2012) will apply for the purpose of examining plans submitted on/before 24 January 2019 (ie this Local Plan). Consequently, references in this report to national policy/the NPPF are to the document of March 2012
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The LPEID, submitted in October 2017 is the basis for my examination. It is the same document as was published for consultation in March 2017.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council has requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for in excess of six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Policies Map Changes Document: Employment and Industry Document as set out in SD-002.
7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.

8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the necessary changes.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
10. The Council has prepared an '*Employment and Industry Document – Submission Duty to Co-operate Statement October 2017*' [Document SD-015]. The statement sets out how the Council has co-operated with other local planning authorities and partner organisations on strategic transboundary issues during the preparation of the LPEID. The Council has engaged with the bodies prescribed in Regulation 4 of the Town and Country Planning (Local Plans)(England) Regulations 2012 (as amended) which include the Greater London Authority (GLA), Natural England, the Environment Agency, Thames Water and neighbouring boroughs.
11. The main cross boundary matters between Wandsworth, the adjoining boroughs and the rest of London include the Vauxhall Nine Elms Battersea Opportunity Area (VNEB), Strategic Industrial Land, safeguarded employment land (including offices), the housing market, the town centre network, infrastructure provision, the river Thames, strategic site specific allocations, and waste and safeguarded wharves.
12. The Council is one of four neighbouring boroughs, along with Hammersmith and Fulham, Kensington and Chelsea and Lambeth, within the Western Riverside Waste Authority (WRWA). All domestic waste in this area is handled under a waste services management agreement. The other boroughs in the WRWA have been consulted and have not objected to the approach adopted in the LPEID. The VNEB extends into the London Borough of Lambeth, which has been engaged with along with the adjoining boroughs which form part of the Functional Economic Area. No issues have been raised with regard to the DtC.
13. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

14. The Council adopted its extant Local Plan Core Strategy (CS), Local Plan Development Management Document (DMPD) and SSAD in March 2016 following a Local Plan review that included all three documents. During the examination hearings, the Council made a commitment to updating the evidence which supports the policies and site allocations for employment and industrial land and premises, and to use this updated evidence to carry out a partial review of these aspects of the Local Plan documents.
15. The LPEID will form part of the Local Plan for Wandsworth setting out relevant planning policies and allocating sites and will replace policies, area spatial

strategies and site allocations in the CS, DMPD and SSAD. It will guide development on these matters until 2031.

16. Although this would result in the LPEID extending beyond the period of the CS, DMPD and SSAD, which extend to 2030, the Council's Local Development Scheme (LDS) indicates the Council is to embark on a full review of all its Local Plan documents, including the LPEID, in the summer of this year, with the aim to produce a new single Local Plan document covering both spatial and detailed policies and site allocations.
17. The Council has undertaken an Employment Land and Premises Study in 2016 [SD-011] to establish the principal evidence base on employment land and premises in the borough. It has produced a Housing and Economic Land Availability Assessment, in 2017, to cover the Plan's intended period 2016-2031 [SD-012]. The housing land component of the assessment has only been partially undertaken to the extent that it was necessary to identify sites that could be developed for residential uses only or to identify the likely mix of residential and economic uses on sites. This is a reasonable proportionate response given the nature of the plan and the coverage of the partial review. The LPEID takes account of the consolidated spatial strategy for London, The London Plan 2016, including the evidence base used to support it. The GLA have confirmed that the LPEID is in general conformity with the adopted London Plan.
18. The GLA have published the draft London Plan for consultation which closed on 2 March 2018. Given the early stage of the draft London Plan and that it has not yet undergone examination in public little weight can be attached to the policies it contains.

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified four main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Will the LPEID positively support the strategic visions, objectives and policies contained in the Core Strategy and is it an appropriate strategy to meet the borough's anticipated employment needs?

20. The CS sets out a spatial vision and strategic objectives for Wandsworth. The vision is to be achieved through a series of objectives divided into three key areas: environmental, social and economic.
21. In relation to employment and industry matters the spatial vision in the CS includes creating a range of opportunities for local business activity, including start up and small enterprises, in mixed use developments. It also seeks to provide for 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.

22. The strategic objectives set to fulfil that vision, include economic objectives to 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. They also include the promotion of the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough. The environmental objectives include the management of waste more efficiently. While the social objectives include the promotion of equality of opportunity, including seeking to ensure that new development is accessible for people with disabilities; and
23. The LPEID focuses its attention on those uses that fall within Part B of the Town and Country Planning (Use Classes) Order 1987 and some other uses that have an industrial character. In this context the Plan considers industrial and office uses. The broader economy including large institutions, community facilities, schools, universities, major hospitals and Wandsworth Prison are all outside the scope of the Plan.
24. The Council disaggregates the office component into that provided in Nine Elms, in the north east of the borough, and the rest of the Borough. Nine Elms is part of the Nine Elms Vauxhall and Battersea Opportunity Area (VNEB). It is also identified as an extension of the Central Activities Zone (CAZ) in the London Plan. The planned redevelopment of the area and office provision is focussed on large national and multinational companies requiring large footprint and high specification accommodation, creating a step change in the provision of offices in the area. The rental values are aligned to the central London office market and it is justified to treat this aspect of office employment as a separate element.
25. The VNEB that is within Wandsworth has capacity for some 205,000 sq m of office floorspace up to 2031. Presently planning permission exists for in the region of 190,000 sq m with further potential sites bringing the figure close to 200,000 sq m of planned supply. There is opportunity for some extant schemes to be reconfigured potentially resulting in further additional office space being provided. Added to this the new American Embassy, which although not technically office floorspace, has recently opened adding over 50, 000 sq m of additional floor space and creating jobs in the area. Therefore given the potential for further office floorspace I am satisfied that the VNEB is likely to be able to achieve the identified capacity and contribute towards the 20,000 jobs referred to in CS Policy PL11. In the rest of the borough there is a forecast demand for office floorspace between 31,700 and 65,800 sq m dependant on the growth scenario. The supply projections indicate that the capacity of identified sites in the Plan would be in the range 59,600 to 71,000 sq m's of office floorspace. Therefore there would be sufficient potential capacity to meet the medium growth scenario and even potentially exceed the high growth scenario for office space. The Plan directs office development to town centres, edge of centres, local centres, Focal Points and the Industrial Business Park part of the Strategic Industrial Land. This would support the Core Strategy's spatial vision and economic objectives by providing for a range of accommodation in appropriate locations increasing job and business opportunities.

27. The assessed level of current industrial land supply is some 141.9 ha of which 78.9 ha are core industrial uses. The LPEID identifies a proposed transfer of some 10.7 ha of core industrial land. This is of similar order to the suggested low growth scenario reduction in demand of 9.5 ha in the Employment Land and Premises Study. Given the prospects within this sector I consider that this level of release is justified.
28. Wandsworth is a borough for 'restricted with exceptions' transfer of employment land according to the GLA's Land for Industry and Transport Supplementary Planning Document (SPD). The benchmark for the borough is identified as -41 ha (a target of -2.1 ha per annum). The Employment Land and Premises Study demonstrates that between 2010 and 2016 the total change has been in the region of -36.9 ha, accounting for some 90% of the total suggested transfer within the first five years. This is substantially greater than that proposed under the transfer rates of the SPD. Coupled with the constrained land availability within the tight urban area of the borough this warrants the overall protection of remaining employment land beyond the releases identified.
29. This is to be achieved by various means with The LPEID including provision for the intensification of floorspace through the identification of the Industrial Business Park and the introduction of Economic Use Intensification Areas (EUIAs). Redevelopment proposals will be required to increase industrial floorspace through Policy EI2. Furthermore, the site allocations within these areas and policies EI4 and EI5 would lead to an increase in industrial floorspace that is of better quality and more suited to modern industrial needs than the current stock. The introduction of Employment Protection Areas (EPAs), in policy EI3 would further strengthen the policy protection of existing smaller employment areas.
30. The strategic reservoir of industrial land is also protected through the identification of Strategic Industrial Land and Locally Significant Industrial Areas in Policies EI3. Further protection of smaller industrial areas is provided through EUIAs and EPAs but there is flexibility for mixed use developments and the replacement or intensification of industrial floor space. Further flexibility is provided through allowing for the release of land in the EPAs in certain circumstances under the terms of Policy EI7. Overall I am satisfied that the LPEID strikes the right balance between protecting important industrial land whilst allowing for flexibility in accordance with national policy.
31. On this basis the Plan would support the vision and objectives of the Core Strategy through the protection of a strategic industrial reservoir whilst providing flexibility and potential for intensification and mixed use development. Better quality accommodation would be provided and support for small and medium sized enterprises would be given. The introduction of EPA would assist in giving the Council control of smaller industrial areas and ensure retention where appropriate but also facilitating release if it is demonstrated that there is not the demand.
32. The Council has addressed changes by reference to industrial floorspace figures rather than use a figure for employment densities or similar. I am satisfied that the use of floorspace figures is justified as the principal thrust is to protect industrial land and to produce intensification through more efficient

use of existing floor space, higher density forms of development and higher intensity of development.

33. Overall I conclude on issue 1 that the LPEID provides an appropriate strategy to meet the borough's anticipated employment needs and positively supports the strategic visions, objectives and policies contained in the Core Strategy.

Issue 2 – Are the individual policies clear, justified and consistent with national policy and will they be effective?

Policy EI1 – Encouraging sustainable economic growth

34. Policy EI1 sets out the overarching framework for the following policies. In effect it articulates the plan's strategy for focusing the various types of employment development in the most appropriate locations to achieve sustainable economic growth. It puts into effect the measures described above to ensure an adequate supply of employment land and premises

Policy EI2 – Locations for New Employment Floorspace

35. Policy EI2 includes the identification of the locations where new office development should be directed towards. The policy, amongst other matters, supports mixed use developments, including offices suitable for Small and Medium-sized Enterprises (SME), at various Focal Points in order to create vibrant active places. The policy seeks to restrict increases in employment (use class B) floorspace by reference to a sequential test. This part of the policy is however dealing with office development and the reference to 'use class B' floorspace introduces confusion and uncertainty in terms of interpretation. The policy should refer to use class B1a office floorspace and **MM1** is recommended to address the deficiency.
36. Policy EI.2 also identifies the areas classed as Economic Use Intensification Areas. To assist in the identification of the areas these should be set out on the Policies Map. Within each of the Economic Use Intensification Areas there are associated site allocations. The policy requires that the site allocations set out the required provision of the economic uses and other uses on those sites and that these must be complied with. The existing bullet point list does not make the identification and associated site allocations readily apparent. To achieve soundness it is recommended that the existing bullet point list is replaced by the table as set out in MM1. Where there is a requirement for a percentage increase in the amount of floorspace in the Site Allocations the Council have confirmed that the percentage increase is in terms of the net internal area and clarification to that effect is necessary. As these changes also all relate to policy EI.2 they are all included within **MM1**.

Policy EI3 - Protected Employment Land and Premises

37. The Locally Significant Industrial Areas were reviewed and considered through the Employment Land and Premises Study (August 2016). The Council has sought to balance the needs of protecting adequate industrial land where there has been a demonstrable loss of industrial land, at a pace in excess of that proposed in the GLA Land for Industry and Transport Supplementary Planning Document. The broad approach to the protection, planned release and intensification is sound and justified by the various studies in the evidence

base. The supply and demand for the finite resource of land is in a finely balanced position. However the loss of significant areas of strategically important industrial land would potentially derail the Council's carefully considered and evidenced position. The Council has sought to release areas from its strategic reservoir and to identify these as Economic Use Intensification Areas which would have the potential of retaining or increasing the level of industrial floor space on the sites but in a more intensive form and thereby facilitating redevelopment, improvements in the quality of the offer and efficiency.

38. However that judgement must be made against the wider backdrop of the need to protect sufficient strategic industrial land to ensure the broad strategy is not compromised. The proposed loss of some Locally Significant Industrial Area, as currently designated, is justified given the nature of the existing uses, the intensity of development and the relationship to adjoining development. However the loss of further areas of the strategic reservoir including parts of the Locally Significant Industrial Areas would erode the strategic industrial base on which the plan's strategy rests. Much of the existing industrial land in these areas reflect an historic pattern of development in the area with close physical relationships with adjoining residential streets this is a common pattern of development in tight urban areas and does not provide justification to remove these areas. Many of the industrial areas also have relatively low vacancy rates.
39. The policy does not directly refer to the policies map or identify the sites which are named as Strategic Industrial Land or Locally Significant Industrial Areas and a change is required to ensure there is sufficient clarity in the policy in this regard. A similar issue arises in respect of Employment Protection Areas referred to in the policy and a similar change is recommended. The policy deals with protecting office floorspace but is not clear that these criteria only relate to redevelopment proposals in the locations identified where the office floorspace is protected. Changes are required to address these matters as identified above and the recommended changes are all incorporated under **MM2**.

Policy EI4 - Affordable flexible and managed workplaces

40. Small firms make up over 90% of businesses in the borough. There are a number of specialist operators and those operating in the creative and digital economies that benefit from clusters of activity. The achievement of realistic rents and provision of suitable forms of accommodation and managed work space are important to support and encourage the development of these sectors. The policy would assist in supporting a more diverse business base and is required to strengthen and support SMEs.
41. The policy does not however clearly identify how such work space and affordable rents would be achieved and section 106 obligations would be used to secure such provision. It is recommended that the policy is amended to provide clarity. To ensure the policy is not excessively prescriptive, such that it would undermine scheme viability, it is recommended that the provision of affordable rent is subject to scheme viability. **MM3** incorporates the recommended changes into policy EI.4.

Policy EI5 - Requirements for new employment development

42. The requirements for new employment development set out a range of matters to be addressed to ensure that they are suitable for modern business needs and provide space for a broad range of users. The policy balances the need to provide appropriate useable floorspace to meet the demands of small business users without placing undue burdens on development that may threaten its viability. The interlinkage with other policies in the strategy, for example the EUIAs, could result in additional developments of mixed use and these requirements are also addressed through the policy.
43. The policy is unclear as to what is meant by a good standard of accommodation and changes are proposed to add clarity. Flexibility is required in terms of floor to ceiling heights, which is excessively prescriptive, and clarity is required to ensure that it is evident that the bullet point list at EI5.2 is inclusive. EI5.4, in seeking to retain existing businesses, should have regard to scheme viability and a change to the wording is necessary. All these changes are set out in **MM4** and are recommended to ensure the policy is clear, not excessively prescriptive and has due regard to scheme viability.

Policy EI6 - Managing land for industry and distribution

44. The policy sets out the appropriate uses required to ensure the strategic reservoir of land is appropriately used and it is generally effective and justified.
45. The emerging London Plan no longer proposes to maintain the designation of Industrial Business Park (IBP). As a consequence IBPs should be referred to as a standalone policy in the LPEID and not reliant on the London Plan. The IBP designation is compliant with the extant London Plan and is justified given the increased flexibility that is proposed for intensified uses whilst still protecting the industrial function of the Strategic Industrial Land (SIL). The introduction of large scale office developments in the SIL, including in the IBP, could undermine its industrial character and would therefore be inappropriate. Large scale offices are appropriately directed towards the Central Activity Zone (CAZ). Changes to policy EI6 are therefore required to confirm that the introduction of office accommodation should not jeopardise the industrial function of the SIL.
46. These changes are set out in **MM5** and are recommended to ensure the management of land for industry and distribution is effective.

Policy EI7 - Redundancy of employment premises

47. Policy EI7 provides an appropriate structure against which to consider the redundancy of employment premises and alternative uses. It facilitates the flexibility required in the protective policies to ensure compliance with the national policy and is therefore justified. The marketing time frame has been in use for some time under previous iterations of industrial policy and appears to operate successfully without being unduly onerous. However, the policy contains some ambiguity and MM6 is recommended to address this in the interests of effectiveness.
48. These recommended changes are identified in **MM6**.

Policy EI8 - Waste & Policy EI9 – Protected Wharves

49. The adopted CS and DMPD contain policies for Waste (PL7, DMI5, DMI6 and DMI7) and which safeguard protected wharves (PL9). The Council has transposed and reconfigured these existing policies into the LPEID. . The Council has demonstrated that Policy EI8 continues to meet the Borough's waste apportionment figure set by the GLA, as set out in the London Plan 2016, and that the Site Specific Allocations have been identified to meet the figure.
50. The policy does not however accurately reflect the NPPF's approach to heritage assets and the contribution their setting makes to the significance of the asset. **MM7** is required to ensure that the policy is consistent with and accurately reflects national policy in this regard.
51. Policy EI9 reflects the strategy set out in the relevant part of policy PL9 - River Thames and the riverside, and therefore supports the CS. There have been no reviews of safeguarded wharves since the Local Plan documents were adopted in 2016 and the policy is justified.

Conclusion

52. Subject to the main modifications identified, the abovementioned policies are clear, justified and consistent with national policy and will be effective.

Issue 3 – Is the Area Spatial Strategy for Wandle Delta consistent with the SSAD and does it support the Core Strategy and Development Management Policies Document?

53. The review of the Employment and Industry policies of the CS and DMPD has implications for the Site Allocations, changing the policy context that would be applicable within them and the context of the Area Spatial Strategies.
54. The LPEID proposes the deletion of the Area Spatial Strategies for the 'land between Armoury Way and the Railway' and for the 'Wandle Delta, land north of the Railway'. These would be replaced by a new single Area Spatial Strategy for the Wandle Delta. The area covered would be extended and cover a greater area of change. It would include new sites within the new Employment Use Intensification Areas, with the potential to introduce mixed use developments including residential, and sites which previously did not fall within either of the aforementioned Area Spatial Strategies but were identified as Site Allocations in the SSAD. The Strategy in the LPEID sets out the existing and potential routes and spaces and building frontages in the Wandle Delta area. It identifies opportunities to improve biodiversity and places where the public realm should be improved. It supports and underpins the Site Allocations and sets an appropriate context within which they are to be considered.
55. The general approach for the Area Spatial Strategy for the Wandle Delta is consistent with that in the SSAD in terms of the existing ones and reflects the updated policy position set out in the remainder of the LPEID. It also complements the CS strategic vision and objectives for the Wandle Delta as set out in PL12 – Central Wandsworth and the Wandle Delta.

56. However, the plan does not specifically identify the site allocations in the main body text or on the relevant diagram, figure 7. This does not make it easy to identify the sites and so undermines the plan's effectiveness. **MMS** is therefore required to ensure the clear identification of the allocated sites.
57. Overall I conclude that the strategy is justified and effective and provides a sound basis and context within which to address the Site Allocations and policies in the Plan in the Wandle Delta area.

Issue 4 – Are the site allocations justified, effective, deliverable within the plan period and consistent with national policy?

58. Paragraph 157 of the NPPF at bullet point 5 advises that Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development.
59. The Site Allocations in the LPEID take forward the previously allocated sites but update them having regard to the new policy constraints, change of designation and taking account of reviews to the site boundaries. There is no evidence to suggest that these sites are not deliverable through the plan period and the previous conclusions on these sites remain sound.
60. The additional sites included are those within the new designation of EUIA and the 92 Putney Bridge Road (HSS Hire) site which forms part of the new designation of Employment Protection Area, and which were previously not allocated for development. The sites are supported by the current landowners and there is sufficient evidence to reasonably conclude that these sites would be deliverable within the Plan period and they are justified.
61. The details in the allocations include sufficient information on the access, scale, height, form and quantum of development expected as well as appropriate uses. This is consistent with national policy and supports the corresponding policies in the LPEID and wider policies from the CS and DMPD.
62. In terms of those sites where there is a requirement for an increase in the amount of floorspace on the site, through policy EI2, the quantum of the increase is specified in the allocation. This is identified as a percentage increase of the current floorspace. The increases have been arrived at following site specific analysis of the potential of the sites and are therefore justified.
63. During the hearing sessions it became apparent that the implementation of reference to Tall Buildings in the current SSAD allocations and the relationship with policy DMS4 had caused some tension. In order to give clarity changes are required to the wording of the allocations for a number of site allocations namely Site Allocations 40, 42, 42A, 42B, 42C, 42D and 99F for buildings of 5 storeys and Site Allocations 50, 51, 52, 53, 54, 55, 56, 57 and 58 in relation to buildings of 9 storeys. The Site Allocation for Riverside Business Centre and Former Bingo Hall includes specific reference to a foot bridge however there are other potential scenarios that could come forward to address the overall aim which is to improve access to the River Wandle. Therefore amended wording is required to introduce the required flexibility for access.

64. In relation to site allocation 42D the Council accept that the existing site is not in industrial use. Changes are required to correctly identify the existing use and the consequential requirement for replacement employment generating floor space rather than industrial floor space.
65. **MM9** is recommended to effect these changes to ensure that future decision makers will know how to react to a development proposal on these sites.
66. Overall I conclude on Issue 4 that the site allocations are justified, effective, deliverable within the plan period and consistent with national policy.

Assessment of Legal Compliance

67. My examination of the legal compliance of the Plan is summarised below.
68. The LPEID has been prepared in accordance with the Council's Local Development Scheme (LDS) November 2017 [PS-006]. The LPEID is identified in the scheme with an anticipated adoption date of Winter 2018 and its contents is as outlined in the LDS.
69. Consultation on the LPEID and the MMs was carried out in compliance with the Council's Statement of Community Involvement 2012 [SD-022].
70. Sustainability Appraisal has been carried out and is adequate. It is in the form of an Integrated Impact Assessment, March 2017 [SD-003] which fulfils the requirement for a Sustainability Appraisal, Strategic Environmental Assessment and also includes an Equalities Impact Assessment and Health Impact Assessment.
71. The Habitats Regulations Appropriate Assessment (AA) Screening Report, April 2017 is included in SD-017 and sets out why an AA is not necessary in relation to this partial review. This is further supported by the Council's response to my preliminary matters, raised in ID-001, as contained in LBW-PR-001 and supported by documents PS-002 to PS-006 which includes a further response from Natural England. Natural England supports the position that AA is not necessary.
72. The LPEID is a partial review of the extant documents that form the Local Plan for the area and which include the CS, DMPD and the SSAD. The Local Plan as a whole includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
73. The LPEID is in general conformity with the spatial development strategy (The London Plan) 2016.
74. The LPEID complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

75. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted,

in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

76. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Wandsworth Local Plan: Employment and Industry Document satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Kenneth Stone

Inspector

This report is accompanied by an Appendix containing the Main Modifications.