

Wandsworth Local Plan Employment and Industry Document

Sustainability Appraisal Screening of Suggested Main Modifications



Table 1 sets out the Suggested Main Modifications and a summary of screening for further sustainability appraisal (SA) of these Main Modifications

Changes are presented in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The Schedule is listed in policy order.

Table 1: Suggested Main Modifications and Screening Conclusions

Ref.	Title	Number	Page No.	Change proposed	Reason	Further Sustainability Appraisal (SA) screening
MM/01	Locations for new employment floorspace	Policy E12	25	Amend second sentence of paragraph E12.2 to read: '...To ensure there is no detrimental impact on town centres, applications for development that would result in a net increase in employment (use class <u>B1a</u>) floorspace will need to be justified by a sequential test.'	Policy E12, point 2 is proposed to be altered due to a typo, the policy should require applications which would result in a net increase in employment use class B1a (offices) to demonstrate that there is no detrimental impact on the town centres.	Change to policy. No further SA is required as the change reflects the NPPF and Development Management Policies Document sequential test and retail impact assessment requirements for out-of-centre development. The outcome of the Main Modification is to clarify that only office use is applicable in the B1 use class.
	Locations for new employment floorspace	Policy E12.4	25	Delete: <ul style="list-style-type: none"> ● Former Gala Bingo Hall/Riverside Business Park, Bendon Valley ● Gas Holder, Hunts Trucks, Delta Business Park, Armoury Way ● Panorama Antennas, Frogmore ● Causeway Island, Keltbray Site and Wentworth House, Dormay Street ● Ferrier Street ● Frogmore Depot 	New formatting is proposed to show which Site Allocations fall within which EUIAs.	Change to formatting. No further SA required.

Ref.	Title	Number	Page No.	Change proposed	Reason	Further Sustainability Appraisal (SA) screening								
				<ul style="list-style-type: none"> Chelsea Cars and Kwik Fit garage, Armoury Way <p>Replace with:</p> <table border="1"> <thead> <tr> <th>Economic Use Intensification Areas</th> <th>Associated Site Allocations</th> </tr> </thead> <tbody> <tr> <td>Bendon Valley</td> <td> <ul style="list-style-type: none"> Riverside Business Centre and former Bingo Hall </td> </tr> <tr> <td>Central Wandsworth</td> <td> <ul style="list-style-type: none"> Panorama Antennas Causeway Island including land to the east Keltbray Site, Wentworth House and adjacent land at Dormay Street Ferrier Street Frogmore Depot Hunts Trucks, adjoining sites including the Gasholder </td> </tr> <tr> <td>Chelsea Cars and KwikFit</td> <td> <ul style="list-style-type: none"> Chelsea Cars and KwikFit </td> </tr> </tbody> </table>	Economic Use Intensification Areas	Associated Site Allocations	Bendon Valley	<ul style="list-style-type: none"> Riverside Business Centre and former Bingo Hall 	Central Wandsworth	<ul style="list-style-type: none"> Panorama Antennas Causeway Island including land to the east Keltbray Site, Wentworth House and adjacent land at Dormay Street Ferrier Street Frogmore Depot Hunts Trucks, adjoining sites including the Gasholder 	Chelsea Cars and KwikFit	<ul style="list-style-type: none"> Chelsea Cars and KwikFit 		
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MM/01	Locations for new employment floorspace	Policy EI2.4	26	Add wording to read: 'The site allocation for each area sets out the required approach to the provision of economic and other uses on the site and must be complied with. <u>Where a site allocation requires a 25% increase in floorspace this will be applied to the net internal area.</u> '	For clarification purposes, add wording to end of para 4 to state that where the increase of 25% floorspace is sought it will be the net internal area.	Change to policy. No further SA is required as the change is for clarification on implementation of the policy.
MM/02	Figure 1 Economic Use Intensification Area	Figure 1	24	Delete Figure 1 identifying the EUIA sites.	See Appendix 1 for proposed Policies Map changes. To clearly identify the EUiAs referred to in policy EI2. The areas will be contained on the Policies Map following adoption in accordance with Appendix 1.	No further SA is required as the change is for clarification.
	Policy EI2	EI2.4	25	Amend wording to first sentence of EI2.4 to read: 'To help meet the need for business and industrial floorspace, and to support emerging and growing industries, the following areas <u>as set out on the Policies Map</u> , are designated as Economic Use Intensification Areas.'	In order to cross refer to the identification of EUiAs within the Policies Map, wording has been added to policy EI2.4.	Change to policy. No further SA is required as the change is for clarification.
	Policy EI3	Figure 2	28	Delete Figure 2 Strategic Industrial	See Appendix 1 for proposed Policies Map changes.	No further SA is required as the change is for

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MM/02				Location.	The Strategic Industrial Location designation remains. The Industrial Business Park is extended as identified in Appendix 1. To clearly identify the sites referred to in policy E13 with the correct related site on the Policies Map to be produced as an update to the proposed additional modification table for consideration at the hearing sessions in accordance with the Inspector's Main Issues and Questions.	clarification.
	Policy E13	Figure 3	29	Delete Figure 3 Locally Significant Industrial Areas.	See Appendix 1 for proposed Policies Map changes. To clearly identify the sites referred to in policy E13 with the correct related site on the Policies Map to be produced as an update to the proposed additional modification table for consideration at the hearing sessions in accordance with the Inspector's Main Issues and Questions.	No further SA is required as the change is for clarification.
	Policy E13	Figure 4	30	Delete Figure 4 Employment Protection Areas (East).	See Appendix 1 for proposed Policies Map changes.	No further SA is required as the change is for

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					To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the Policies Map.	clarification.
	Policy EI3	Figure 5	31	Delete Figure 5 Employment Protection Areas (West).	See Appendix 1 for proposed Policies Map changes. To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the Policies Map.	No further SA is required as the change is for clarification.
	Policy EI3	Figure 6	31	Delete Figure 6 Employment Protection Areas (South).	See Appendix 1 for proposed Policies Map changes. To clearly identify the sites referred to in policy EI3 with the correct related Employment Protection Areas on the Policies Map.	No further SA is required as the change is for clarification.
MM/02	Policy EI3	Policy EI3.1	32	Amend wording of first sentence in EI3.1 to read: 'A strategic reservoir of industrial land will be retained in the borough, made up of the Queenstown Road, Battersea Strategic Industrial Location (SIL) and the following Locally Significant Industrial Areas (LSIAs) in the Wandle Valley as	In order to cross refer to the identification of SIL and LSIAs within the Policies Map, wording has been added to policy EI3.1	Change to policy. No further SA is required as the change is for clarification on implementation of the policy.

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	Policy E13	Policy E13.3	33	<p><u>identified on the Policies Map:</u></p> <p>Amend wording of the 4th Paragraph on p33 to read: 'The following areas will be protected <u>as identified on the Policies Map.</u>'</p>	In order to cross refer to the identification of EPAs within the Policies Map, wording has been added to policy E13.3	Change to policy. No further SA is required as the change is for clarification.
MM/03	Policy E14		38	<p>Add wording to paragraph E14.2 to read:</p> <p>'All development that provides economic floorspace will be expected to contribute to the provision of affordable, flexible and/or managed workspace <u>and will be secured via S106 agreement.</u></p>	To ensure clarity on how affordable, managed workspace will be secured, wording will be added to the policy to highlight that the mechanism used will be via S106.	Change to policy. No further SA is required as the change is for clarification.
MM/03	Policy E14		38	<p>Add wording to paragraph E14.2bii to read:</p> <p>'Providing a proportion of office floorspace at an affordable rent in perpetuity: <u>subject to scheme viability.</u>'</p>	As agreed at the hearing sessions wording will be added to refer to scheme viability within policy E14.	Change to policy. No further SA is required as the change is for clarification on how the policy will be implemented.
MM/04	Paragraph	2.24	39	<p>Add a new paragraph following paragraph 2.24 to read:</p> <p><u>'Poorly designed workplaces combine multiple pathways for health risks – from exposure to indoor pollutants and increased risk of asthma to lack of physical activity during work hours leading to obesity and fatigue. People spend significant parts of their lives working in buildings that affect their</u></p>	Whilst it is considered that the criteria of Policy E15 together with the adopted Development Management Policies DMS1 (General Development Principles - Sustainable Urban Design and the Quality of the Environment), would generally cover Active Design principles it is agreed that wording on Healthy and Active Design can	No change to policy. Change to clarify and assist the implementation of the policy. No further SA is required.

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				<u>health. As a consequence new development proposals should consider the impacts on the health and wellbeing of employees. Examples include good access to natural daylight and locating and making staircases more convenient and attractive so employees can use them on a regular basis. By incorporating Active Design into employment environments, employers stand to benefit from employees' increased productivity and improved quality of life.'</u>	be incorporated as a new paragraph following para 2.24 to clarify that Active Design should be considered as part of a requirement for new employment development.	
	Requirements for new employment development	Policy E15	39	Add a new 7th bullet point to Policy E15 1: 'Good Telecommunications connectivity, including superfast broadband connections where appropriate; <u>Active Design which encourages wellbeing and greater physical movement as part of everyday routines.'</u>	It is considered that the criteria of Policy E15 together with the adopted Development Management Policies DMS1 (General Development Principles Sustainable urban design and the quality of the environment would generally cover Active Design principles. However, a minor amendment to Policy E15 can also be accommodated to reflect this consideration.	Change to policy. No further SA is required as the change is for clarification on how the policy will be implemented.
	Requirements for new	Policy	39	Amend wording at first sentence of E15.1 to read:	The policy is considered to be sound and based on a robust	Change to policy. No further SA is required as

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	employment development	E15		'New developments for economic uses must provide a good standard of accommodation and be suitable <u>flexible workspace which would allow for a range of unit sizes</u> for use by a wide range of occupiers.'	and credible evidence base. The intention of policy E13 is to ensure that there is no net loss of the existing office and industrial floorspace, the policy also cross refers to policy E15 which seeks any redevelopment to retain existing businesses on site following development, with similar lease terms and rent levels, if the businesses wish to remain. It is proposed that the wording is amended to clarify what is meant by 'good standard of accommodation' to also consider the scale and type of premises for a wide range and type of unit sizes for use by a wide range of business occupiers. This change should give further emphasis on achieving the optimal requirements for new employment development.	the change is for clarification.
	Requirements for new employment development	Policy E15	39	Amend Policy E15 (2) bullet point 2 to read: 'Floor to ceiling heights of 3.35m <u>or similar where justified</u> .'	It is considered that 3.35m is a standard height for industrial uses, however it is acknowledged that where the buildings are being designed for	Change to Policy. No further SA is required as the change is minor.

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					specific end users this may require a slight deviation from the 3.35m height. A minor change is therefore proposed to the wording of the policy to accommodate this flexibility to accommodate a variation in height to suit the requirements of the user where justified.	
MM/04	Requirements for new employment development	E15.4	40	Add new paragraph after 2.24 to read: <u>'2.25 Given the significant increase in rent levels for businesses in the borough in recent years, and the affordability implications for many businesses, especially the SME firms that make up the majority of the borough's business base, it is considered appropriate to seek realistic rents for existing businesses and to take into consideration existing space requirements and any other reasonable business needs following redevelopment in accordance with the Planning Obligations SPD.'</u>	In order to clarify the policy reflects the aspirations of the Council and that the policy will be subject to viability. The Council will shortly be producing a revised Planning Obligations SPD which will contain the approach as to how the Council wishes an applicant to retain existing businesses.	No change to policy. No further SA is required.
	Requirements for new	E15.4	40	Amend E15.4 to read: 'Redevelopment of existing economic	As agreed at the hearing sessions clarification on when	Change to Policy. No further SA is required as

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	employment development			uses should <u>where viable wherever possible</u> seek to retain existing businesses on site following development, <u>with similar taking into consideration existing space requirements</u> , lease terms and rent levels, and <u>any other reasonable business requirements</u> , if those businesses wish to remain. <u>If retention is not possible this should be demonstrated through a viability appraisal to the satisfaction of the Council. Further details will be set out in the Planning Obligations SPD.'</u>	E15.4 should be applied has been added.	the change is for clarification on implementation of the policy.
MM/05	Managing land for industry and distribution	Paragraph 2.29	41	Delete paragraph 2.29 : The northern and western edges of the Queenstown Road, Battersea SIL will be promoted for designation in the forthcoming London Plan as Industrial Business Park. The Summerstown LSIA will be promoted for designation in the forthcoming London Plan as part of the North Wimbledon SIL. The North Wimbledon SIL is currently made up of the industrial estates at Durnsford Road and Plough Lane in the London Borough of Merton.	Paragraph 2.29 is proposed to be deleted in recognition that the emerging London Plan no longer recognises IBP as a category of designation. In addition to the above it is proposed to delete reference to Summerstown LSIA potentially becoming part of the North Wimbledon SIL as part of the emerging London Plan. As agreed at the hearing sessions Summerstown industrial area to remain as LSIA in accordance with the latest evidence of the Employment Land and Premises	No change to policy. No further SA is required as the change is for clarification on implementation of the policy.

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				<p>and replace with the following wording:</p> <p><u>'The northern and western edges of the Queenstown Road, Battersea SIL will be designated as Industrial Business Park (IBP). All development in these areas will be required to provide floorspace for industrial uses. Those proposals which additionally include research and development (B1b) or SME office accommodation (B1a) may also be appropriate provided these uses do not erode the industrial function and character of the SIL. The IBP designation will facilitate at this accessible location the development of intensified employment uses, complementing the anticipated digital cluster focussed on the emerging Battersea Power Station town centre, whilst maintaining compatible business uses within the SIL.'</u></p>	<p>Study.</p> <p>A new paragraph has been proposed which provides details of the IBP designation and defines types of development that are suitable.</p>	
MM/05	Managing land for industry	Policy E16.6	42	Amend wording in last sentence of Policy E16.6 to read:	To provide clarification. E16.6 makes provision for SME office	Change to policy. No further SA is required as the change

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	and distribution			‘Alongside industrial uses, these parts of the SIL will also be appropriate for research and development (B1b) uses as well as smaller-scale offices (B1a) that provide accommodation for SMEs <u>SME office accommodation (B1a) provided that the use does not impede the effective operation of the industrial function of the SIL.</u>	accommodation in appropriate circumstances as set out in the EI6.6 and suggested modification. In addition wording has been added to the policy to recognise that office development may only be appropriate where it does not jeopardise the industrial function of the SIL.	is for clarification on implementation of the policy.
MM/06	Redundancy of employment premises	Policy EI7.1	43	Amend wording between bullet point 1 and 2 of EI7.1 to read: <ul style="list-style-type: none"> • ‘The premises must be unsuccessfully marketed for a continuous period of at least 18 months while vacant or available for occupation; and • Convincing <u>Justifiable</u> evidence must be provided to demonstrate that it is not feasible or viable to refurbish, renew or modernise the premises in order to meet the requirements of existing or future occupiers.’ 	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to justifiable in accordance with the Inspector’s Main Issues and Questions.	Policy change. No further SA is required as the change is for clarification on implementation of the policy.
	Redundancy of employment premises	Policy EI7.3	43	Amend wording of first sentence in Policy EI7.3 to read: ‘For larger offices that provide over 1,000	To ensure the policy is clear and there is no ambiguity, the word convincing has been changed to	Policy change. No further SA is required as the change is for clarification

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				sq ms of office floorspace, convincing <u>justifiable</u> evidence must be provided to demonstrate that it is not feasible or viable to adapt the office floorspace as smaller business (B1) units to meet demand from SME business.'	justifiable in accordance with the Inspector's Main Issues and Questions.	on implementation of the policy.
MM/06	Redundancy of employment premises	Policy EI7.4	43	Amend wording of first sentence in Policy EI7.4 to read: 'In Employment Protection Areas, employment premises should be marketed <u>in accordance with EI7.1</u> for a broad range of employment uses including all B class and appropriate <i>sui generis</i> uses.'	To ensure the policy is clear, cross reference to EI7.1 has been added to the policy as agreed at the hearing sessions.	Policy change. No further SA is required as the change is for clarification on implementation of the policy.
MM/07	Waste	Policy EI8.6	47	Add wording to Policy EI8.6, (iv) to read: 'Is proposed on a site meeting the following locational criteria: <ul style="list-style-type: none"> • 'The site is not within, or partly within, nature conservation areas protected by current international and national policy; and • the site does not contain <u>or adversely affect the setting of</u> Heritage Assets' 	An amendment is proposed to take further into account heritage assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan Policies. DMPD policy DMS2 and DMS2b currently refers to the '...setting of the Heritage Asset itself and the surrounding historic environment...'	Policy change. No further SA is required as the changes are to better align the policy with the intention of the NPPF regarding Heritage Assets.

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MM/07	Waste	Policy EI8.7	48	Add wording at Policy EI8.7, (vii) to read: 'sites which contain no archaeological features <u>and do not adversely affect Heritage Assets or their settings;</u> '	An amendment is proposed to take further into account Heritage Assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan policies. DMPD policy DMS2 and DMS2b currently refers to the '...setting of the heritage asset itself and the surrounding historic environment...'	Policy change. No further SA is required as the changes are to better align the Policy with the intention of the NPPF regarding Heritage Assets.
	Waste	Policy EI8.9	48	Add wording at Policy EI8.9,(vi) to read: 'the impact of development on Heritage Assets <u>or their settings;</u> '	An amendment is proposed to take further into account heritage assets as proposed by Historic England in accordance with the NPPF and align with existing Local Plan policies. DMPD policy DMS2 and DMS2b currently refers to the '...setting of the heritage asset itself and the surrounding historic environment...'	Policy change. No further SA is required as the changes are to better align the Policy with the intention of the NPPF regarding Heritage Assets.
MM/08	Area Spatial Strategy Wandle delta	Area Spatial Strategy Wandle delta	49	Amend Figure 7 Area Spatial Strategy for Wandle Delta to include a key identifying the site allocations and to change format to landscape to accommodate this change.	See Appendix 1 for further details. As agreed at the hearing sessions a key will be identified	No further SA is required as the change is for clarification

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					on Figure 7 for consistency and clarity and to accommodate this change the format will be changed to landscape view.	
	Area Spatial Strategy Wandle delta	Area Spatial Strategy Wandle delta	50	<p>Add new section after paragraph 3.5 before the Strategic Opportunities section to read:</p> <p>'The Sites</p> <p>There are 16 sites that are all inter-linked in terms of the contribution that future development proposals can make to the achievement of the objectives for the area. These sites are:</p> <ol style="list-style-type: none"> 1. Causeway Island including land to the east 2. Hunts Trucks, adjoining sites including Gasholder, Armoury Way 3. Keltbray Site, Wentworth Housing & adjacent land at Dormay Street 4. Frogmore Depot 5. Panorama Antennas 6. Ferrier Street 7. 92 Putney Bridge Road (HSS Hire) 8. 9, 11 and 19 Osiers Road 9. Linton Fuels Site, Osiers Road 10. Feather's Wharf, The Causeway 11. Land at the Causeway 	For clarification and consistency it is proposed to add wording to the Area Spatial Strategy to include listing the sites that are allocated.	No further SA is required as the change is for consistency and clarification

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				<p>12. Cory Environmental Materials Recycling Facility, Smugglers Way</p> <p>13. Western Riverside Transfer Station</p> <p>14. Homebase, Swandon Way</p> <p>15. B and Q, Smugglers Way</p> <p>16. Wandsworth Riverside Quarter, Point Pleasant.</p> <p>This Area Spatial Strategy for Wandle Delta provides guidance for these 16 sites and the diagram shows how any new development should be designed in order to meet the Local Plan objectives. The strategy shows how new development should be designed in order to contribute to the provision of vibrant new public spaces and achieve safe and attractive connections within the town centre and start the connections to the Thames Riverside.'</p>		
	Policies Map reference number 40 42 42A 42B		57 63 65 68 70 72 and	<p>Amend Tall Buildings paragraph to delete first sentence to read:</p> <p>'In accordance with Core Strategy Policy IS3d. Tall buildings in this location are</p>	To provide clarity and avoiding misinterpretation of DMPD Policy DMS4.	No further SA is required as the change is for clarification on how policy is implemented.

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MM/09	42C 42D 99F		104	likely to be inappropriate. In accordance with DMPD DMS4, the height at which a development in this location will be considered to be tall is 5 storeys. <u>Policy DMS4 sets out the areas where tall buildings may be appropriate or are likely to be inappropriate. Development proposals will trigger assessment against the detailed criteria in Policy DMS4b in order to demonstrate compliance with the Core Strategy.'</u>		
	Policies Map reference number 50 51 52 54 55 56 57 58		84 86 90 92 94 96 98 99	Amend Tall Buildings paragraph to delete first sentence to read: 'In accordance with Core Strategy Policy IS3d. Tall buildings in this location are likely to be inappropriate. In accordance with DMPD DMS4, the height at which a development in this location will be considered to be tall is 9 storeys. <u>Policy DMS4 sets out the areas where tall buildings may be appropriate or are likely to be inappropriate. Development proposals will trigger assessment against the detailed criteria in Policy DMS4b in order to demonstrate compliance with the Core Strategy.'</u>	To provide clarity and avoiding misinterpretation of DMPD Policy DMS4.	No further SA is required as the change is for clarification on how policy is implemented.