



Representation on behalf of Safestore PLC

17th March 2023

1. Introduction

- 1.1. Savills has been instructed by Safestore PLC (“Safestore”) to prepare this representation in response to the London Borough of Wandsworth (“LBW”) Local Plan Main Modifications which are subject to consultation from 3rd February 2023 to 17th March 2023.
- 1.2. Safestore has engaged throughout the LBW Local Plan Review process. Safestore welcomes the opportunity to comment on the LBW’s Main Modifications to the Draft Local Plan, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. Safestore support LBW’s ambition to produce an up-to-date development plan document that aligns with National and Regional policy and considers the emerging challenges and opportunities for the Borough. Safestore shares the view that a positive policy framework can and should be used to plan for and deliver the scale of growth that London requires in a sustainable and inclusive way.
- 1.3. This representation sets out Safestore’s position in respect of the following Main Modifications (See in full at Appendix 1):
 - **MM4** - SDS1 Spatial Development Strategy 2023-2038;
 - **MM146** - LP4 Tall and Mid-rise Buildings;
 - **MM202** - Map 18.1 Economic Land;
 - **PMC17** - Battersea Design and Technology Quarter;
 - **PMC18** - Queenstown Road SIL; and
 - **PMC19** - Battersea Design and Technology Quarter LSIA.

2. Main Representation

MM4 - SDS1 Spatial Development Strategy 2023-2038

- 2.1. Safestore acknowledges that LBW has proposed to amend the wording of paragraph 2.104 to ensure that it references the most up-to-date LBW AMR position (2021/22) and correlates with the Draft Local Plan period of 2023 – 2038. Safestore notes that this proposed change is a result of discussions between LBW and the Homebuilders Federation that have been agreed between the parties through a SoCG.
- 2.2. Notwithstanding, The Draft Local Plan housing delivery target remains at 20,311 homes. This figure represents a significant shortfall against the objectively assessed local housing need figure (LHNF, 2020) of 2,537 homes per annum or 45,666 homes between 2019 and 2037, as set out in the LBW’s Local Housing Needs Assessment (LHNA, 2020). MM4 proposes no change to this figure. As such, and as outlined in Safestore’s Matter 2 Hearing Statement, the Draft Local Plan:

- Does not accord with paragraph 35 (a) of the NPPF which states that plans should be positively prepared and provide a strategy that, as a minimum, seeks to meet the area’s objectively assessed needs;
 - Conflicts with the recommendation made in the LHNA which states that *“The Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible.”*; and
 - By simply adopting the London Plan housing target, the Draft Local Plan has no regard to the fact that a review of the London Plan should be undertaken at the earliest opportunity when all identified housing need is not being met to ensure the plan in place reflects current national policy (as noted in the letter written to Mayor of London from the then Secretary of State for Housing, Communities and Local Government, James Brokenshire, dated 27 July 2018).
- 2.3. In order for the Draft Local Plan to satisfy the NPPF test of soundness, it should have due regard to the Draft Local Plan evidence base in seeking to meet its own identified housing need figure rather than defaulting to the London Plan 10-year housing target which is informed by an out-of-date evidence base and very likely to undergo a review.
- 2.4. In addition to the Draft Local Plan housing delivery target being unjustifiably low, we note that at the time of writing, a number of site allocations that have been identified as having the ability to contribute towards this target are considered to be undeliverable, further reflecting how the Draft policy framework is not **positively prepared** or **effective**, and therefore unsound. These site allocations include:
- **Lombard Road (RIV6)** – allocated for residential uses and economic floorspace, including improvements to the amenity of the surrounding area and the creation of a new public space.

MM146 - LP4 Tall and Mid-rise Buildings

- 2.5. Safestore has made representations in respect of Ingate Place and Lombard Road during previous consultations on the Draft Local Plan. Safestore has consistently challenged the soundness of Draft Policy LP4 on the grounds that, the building height limits are unjustified and prevent viable development from coming forward, therefore sterilising the development potential of available, deliverable, and allocated sites, such as Ingate Place (NE7) and 19 Lombard Road (RIV8). The proposed Main Modifications do not alter the position taken by Safestore in previous rounds of consultation.
- 2.6. Notwithstanding, Safestore welcomes the justification by LBW through MM146 that Draft Policy LP4 should be more flexible to allow tall or mid-rise buildings to come forward outside of identified tall building zones. The Council’s justification for MM146 is as follows (bold emphasis added):

*‘To enable **more flexibility** in recognition that there **may be instances where tall or mid-rise buildings may be appropriate outside these zones based on a more detailed assessment at planning application stage**. The Council wishes to maintain the thrust of its position by seeking to restrict proposals for tall and mid-rise buildings outside these zones. However, the proposed wording is considered more flexible than stating that proposal will not be permitted, to potentially allow for such proposals.’*

- 2.7. Whilst Safestore fully supports the Council's justification case, Safestore does not consider that the proposed wording of MM146 accurately reflects either the concerns raised during the examination in public or its own objective as set out in its justification. The evidence base which underpins Draft Policy LP4 – Arup's Urban Design Study (2021) – acknowledges at Appendix A that:

'In all cases, further analysis will be required to determine actual proposals for individual sites on the basis of detailed review and analysis of the specific local context which is not part of the scope of this borough-wide study.'

- 2.8. Given the above, Safestore considers that the wording of Draft Policy LP4, even with the proposed amendments of MM146, sets out unjustified approach to the development of tall buildings which does not align with the Draft Local Plan evidence base and fails to reflect the fact that further analysis and detailed review is required to determine site specific proposals.
- 2.9. By seeking to restrict the development of tall buildings outside of tall building zones, without a proportionate evidence base, Draft Policy LP4 is not **justified** or **positively prepared**. Safestore consider that the proposed wording of MM146 takes a particularly negative approach to the development of tall buildings and cannot be considered sound.
- 2.10. In light of the above, Safestore consider that Draft Policy LP4 should include the following wording:

'Proposals for tall buildings may exceed the height of the relevant definition established in Appendix 2 where they would not result in any adverse visual, functional, environmental and cumulative impacts in accordance with London Plan policy D9(c).'

MM202 - Map 18.1 Economic Land

- 2.11. Safestore support MM202, which proposes to amend the Battersea Design and Technology Quarter (BDTQ) to only include Havelock Terrace and Ingate Place, with the removal of the area north of Palmerston Way and the removal of the area south of Ingate Place. This proposed change reflects discussions between Safestore and LBW at the Examination in Public.

PMC17 - Battersea Design and Technology Quarter

- 2.12. Safestore support PMC17 as per MM202. This proposed change reflects discussions between Safestore and LBW at the Examination in Public.

PMC18 - Queenstown Road SIL

- 2.13. Safestore support PMC18 which removes the area to the north including Havelock Terrace and Ingate Place from the Queenstown Road SIL designation. This reflects the wider characteristics of the area and supports the vision for Ingate Place to deliver a mix of uses, including industrial.

PMC19 - Battersea Design and Technology Quarter LSIA.

- 2.14. Safestore support PMC19 which includes Ingate Place (NE7) within the new Battersea Design and Technology Quarter LSIA boundary. This amendment reflects that a more flexible policy framework is required to ensure general conformity with the London Plan and can help to facilitate Ingate Place in

delivering *'a mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space.'*, as outlined in the Draft site allocation.

3. Conclusion

- 3.1. Having reviewed the Main Modifications to the Draft Local Plan, Safestore considers that the amendments to SDS1 Spatial Development Strategy 2023-2038 and Draft Policy LP4 outlined in this representation are necessary if the Draft Local Plan is to be justified, effective in its delivery, consistent with national policy, and sound.
- 3.2. Thank you for the opportunity to comment on the Main Modifications. Safestore would welcome any further engagement with LBW and the Inspectors as the Local Plan Review progresses. Please do not hesitate to contact us via the details below should you require any further information.

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Appendix 1

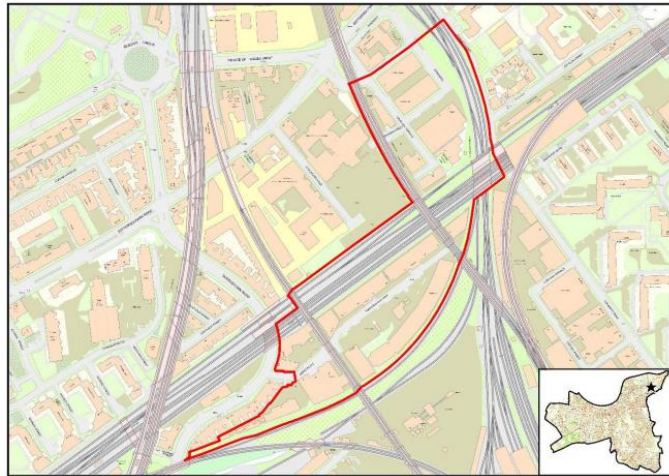
Main Modification Number	Section of the Plan	Proposed Main Modification	Justification	Reason for change																														
MM4	SDS1 Spatial Development Strategy 2023-2038	<p>Amend para 2.104 as follows:</p> <p>‘The number of new homes to be provided between 2023 and 2038, as set out in SDS1, has had regard to the housing target for the borough set out in the London Plan of a minimum of 1,950 dwellings per annum to 2028/29. The Council’s latest Authority Monitoring Report, <u>2021/22</u>, demonstrates that there is sufficient capacity provided for through the Wandsworth Local Plan 2016 (taking into account Site Allocations, extant and implemented planning permissions which have yet to be completed) to deliver 1,950 dwellings per annum for the period 2019/20 (which is the start date of the London Plan) to 2022/23 – i.e. the period prior to the start date of this Plan. <i>It also demonstrates an expectation to meet the 10 year London Plan target.</i></p> <table border="1" data-bbox="584 794 1200 1198"> <thead> <tr> <th>Year</th> <th>Completions</th> </tr> </thead> <tbody> <tr><td>2015/2016</td><td>2,735</td></tr> <tr><td>2016/2017</td><td>2,710</td></tr> <tr><td>2017/2018</td><td>2,025</td></tr> <tr><td>2018/2019</td><td>1,877</td></tr> <tr><td>2019/2020</td><td>1,359</td></tr> <tr><td>2020/2021</td><td>1,422 1,470</td></tr> <tr><td>2021/2022</td><td>2,571 (projected) 1,974</td></tr> <tr><td>2022/2023</td><td>2,169 2,108 (projected)</td></tr> <tr><td>2023/2024</td><td>2,392 3,712 (projected)</td></tr> <tr><td>2024/2025</td><td>2,460 2,846 (projected)</td></tr> <tr><td>2025/2026</td><td>1,414 4,008 (projected)</td></tr> <tr><td>2026/2027</td><td>2,424 (projected)</td></tr> <tr><td>2027/2028</td><td>2,957 (projected)</td></tr> <tr><td>2028/2029</td><td>1,934 (projected)</td></tr> </tbody> </table> <p style="text-align: right;">Table 2.3 Housing Delivery (Source: 2019/20 <u>2021/22</u> Authority Monitoring Report)’</p> <p>Add to the beginning of para 2.105 as follows:</p>	Year	Completions	2015/2016	2,735	2016/2017	2,710	2017/2018	2,025	2018/2019	1,877	2019/2020	1,359	2020/2021	1,422 1,470	2021/2022	2,571 (projected) 1,974	2022/2023	2,169 2,108 (projected)	2023/2024	2,392 3,712 (projected)	2024/2025	2,460 2,846 (projected)	2025/2026	1,414 4,008 (projected)	2026/2027	2,424 (projected)	2027/2028	2,957 (projected)	2028/2029	1,934 (projected)	To provide update to current AMR position, and to illustrate a how the London Plan target will be met over the London Plan period.	In response to the Homebuilders Federation and to provide a clear target and trajectory in the plan to assist with monitoring the Local Plan’s performance.
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		<i><u>'The Local Plan sets out a housing trajectory for the ten-year period of the London Plan, 2019/20 – 2028/29, which identifies an annualised target against which the Council will monitor progress. This is included at Appendix 1.'</u></i>		
MM146	LP4 Tall and Mid-rise Buildings	<p>Amend parts C and G of LP4 as follows:</p> <p>C. <i><u>'The Council will seek to restrict P</u></i>proposals for tall buildings will not be permitted outside the identified tall building zones.'</p> <p>G. <i><u>'The Council will seek to restrict P</u></i>proposals for mid-rise buildings will not be permitted outside the identified tall and mid-rise building zones.'</p>	To enable more flexibility in recognition that there may be instances where tall or mid-rise buildings may be appropriate outside these zones based on a more detailed assessment at planning application stage. The Council wishes to maintain the thrust of its position by seeking to restrict proposals for tall and mid-rise buildings outside these zones. However, the proposed wording is considered more flexible than stating that proposal will not be permitted, to potentially allow for such proposals.	As a result of Hearing discussion.
MM202	Map 18.1 Economic Land	Amend the Battersea Design and Technology Quarter boundary to only include Havelock Terrace and Ingate Place, with the removal of the area north of Palmerston Way and the removal of the area south of Ingate Place.	<p>To correctly reflect the significance of the cluster.</p> <p>In response to the GLA to ensure general conformity with the London Plan policies E4 and E7.</p>	

Policies Map Modifications

PMC17 Battersea Design and Technology Quarter

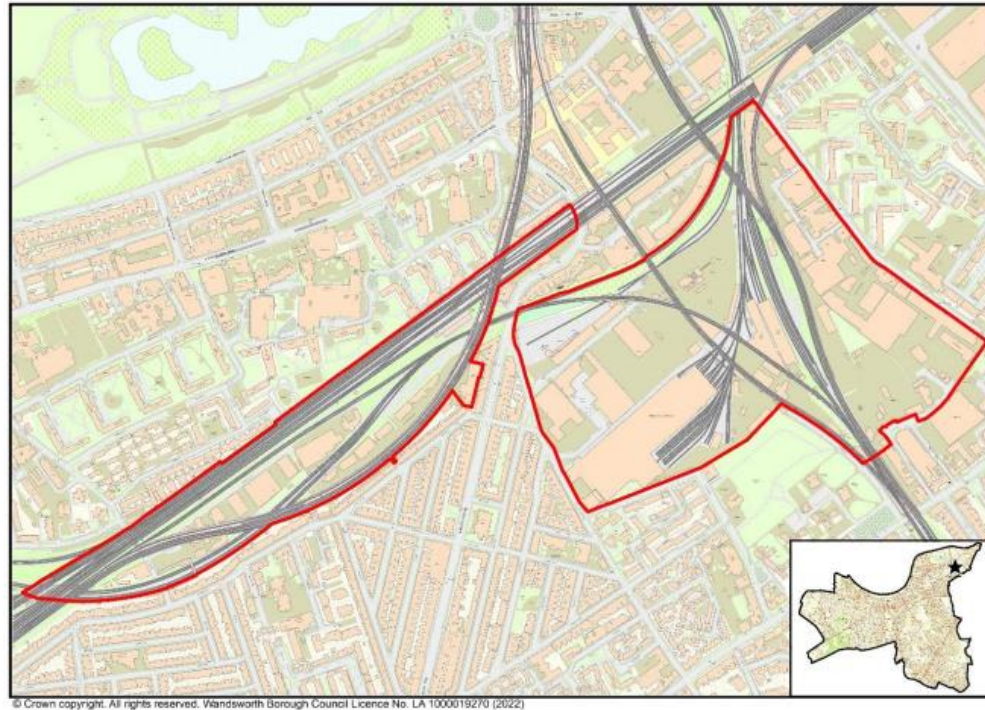
It is proposed to amend the Battersea Design and Technology Quarter designation to include Havelock Terrace, excluding the area north of Palmerston Way, and Ingate Place with the area to the south including Silverthorne Road removed.



Reason for Change: In response to the GLA to ensure general conformity with the London Plan policies E4 and E7. See Main Modification MM202 in PSD-028.

PMC18 Queenstown Road SIL

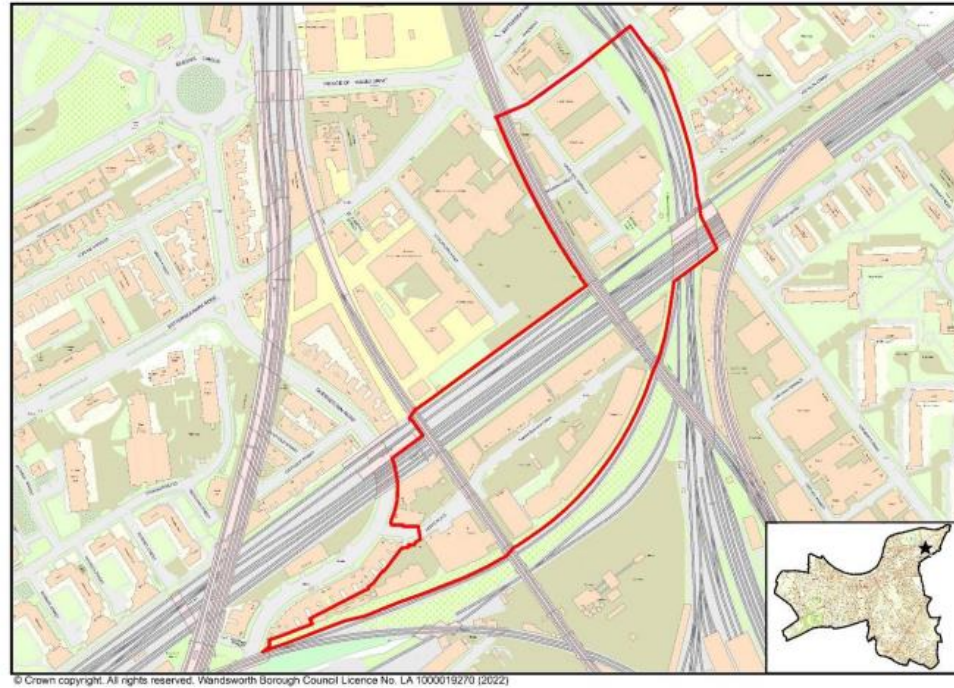
The SIL boundary is proposed to be amended to remove the area to the north including Havelock Terrace and Ingate Place.



Reason for Change: In response to the GLA to ensure general conformity with the London Plan policies E4 and E7. See Main Modification MM202 in PSD-028.

PMC19 Battersea Design and Technology Quarter LSIA

It is proposed to include a new boundary which includes Havelock Terrace, excluding the area north of Palmerston Way, and Ingate Place. The designation should be titled Battersea Design and Technology Quarter LSIA.



Reason for Change: In response to the GLA to ensure general conformity with the London Plan policies E4 and E7. See Main Modification MM202 in PSD-028.