

Wandsworth Council

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Our ref: NDT5
Your ref:
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Linda Wride DIPTP, MRTPI
The Planning Inspectorate
c/o Vijaya Ram
Programme Officer
vijaya.p.ram@barnet.gov.uk

Dear Ms Wride

Wandsworth Core Strategy Examination

I am writing to provide an update on the Council's progress in addressing the concerns raised in your recent letters.

Affordable Housing:

The Council is in the process of appointing consultants to undertake an assessment of the economic viability of the Council's affordable housing policy. Following discussions with the Greater London Authority (GLA), we should be in a position to appoint consultants in the week commencing 8 June 2009, and expect the report to be delivered by 24 July 2009.

In your letter of 15 May 2009, you again raised the issue that the affordable housing target did not include "measurable targets for the % affordable units to be provided in developments of 10 or more units".

The current policy wording reflects a response to the GLA's comments on the Council's policy at the Preferred Options stage. Preferred Options Policy IS4 included the wording "At least one in three homes in major development should be affordable and a higher level will be encouraged where viable". In the GLA's opinion Policy IS4 was not in conformity with the London Plan and therefore discussions took place leading to the current wording of the policy. Planning Policy Statement 3 (PPS3) Housing states that Local Planning Authorities should "set an overall (ie plan-wide) target for the amount of affordable housing to be provided". In amending the Council's affordable housing policy our reading of PPS was that there is no requirement for a site specific percentage of affordable housing to be included in the policy. We have been advised by the

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Government Office for London that they sought advice from Communities and Local Government's Planning Policy division on the wording of the Council's policy and they were informed that it met the requirements of PPS3 in this aspect.

In the light of your comments, we will be meeting the GLA on 26 May 2009 to discuss potential changes to the wording of the affordable housing policy. Discussions with the GLA will include an exploration of the nature of the changes we might propose to make to the affordable housing policy whilst remaining in conformity with the London Plan.

In considering the changes we make we will take account of the work that has previously been done as part of the sustainability appraisal of this policy. This has included analysis of the effect of the options of "At least one in three homes in major development should be affordable" and "retention of 25% target of affordable housing" in addition to the current policy. The need or otherwise for any potential changes, will then be reviewed in the light of the result of the consultants report on economic viability when this becomes available and we would hope to be in a position to outline any changes we propose to make to the wording of the policy by 5 August 2009.

At the present time, subject to the results of the economic viability testing, we do not expect to make significant changes to the policy which have not previously been considered as part of the plan making process and are therefore of the opinion that a further consultation period is unlikely to be necessary.

Tall Buildings:

The Council had a productive meeting with English Heritage on 21 May 2009 and is considering how it might address their concerns, however in our view, as a result of the meeting, we do not feel that there is a great distance between us. Following this meeting, the Council is documenting in one place the urban design considerations employed in developing its tall buildings policy. The Council is also and considering potential, relatively minor, changes to policy IS3 d. to make the policy more explicit in relation to where tall buildings are not considered appropriate, and how it will consider both the positive and negative impacts in accessing proposals for tall buildings in areas where they may be appropriate. We will also be considering potential changes to the area based policies referencing tall buildings.

The Council is engaging in continuing positive discussions with English Heritage, and would hope to be in a position to provide you with additional information before the Exploratory Meeting on 16 June 2009.

As you know, the Parliamentary Under-Secretary of State's response to the Member for Battersea on 29 April 2009 noted that; "It is not expected that rigid height limits for specific locations should be included in local development frameworks. Instead, core strategies should contain broader policy that sets guidance for development in an area" and, "the local planning authority must prepare a core strategy, which might incorporate a working definition of a tall building and indicate which locations could be appropriate in that particular area or what other factors would need to be taken into account, such as access

to public transport. There may also be a requirement in terms of the benefits that a tall building should offer, whether regeneration, affordable housing—a matter of some concern and passion to my hon. Friend—or some other public good that could be solved by sound design, planning conditions or a section 106 agreement with the developer. If desired, detailed criteria for assessing the design and impact of tall buildings can be incorporated in a local authority’s development management document.”

Subject to the adjustments to address English Heritage’s concerns, we feel that the Council’s approach to tall buildings is consistent with this approach.

Implementation and Monitoring:

I attach a copy of a combined table indicating the related infrastructure and indicators for each policy, including the information outlined in your letters.

Where further information has become available on the delivery of infrastructure projects since submission, e.g. confirmation of funding of the East London Line, this has been included in the table.

The Council’s Annual Monitoring Report 2007/8 reports information on each of the indicators and as identified in the Core Strategy, in future, it is intended to update the infrastructure schedule as part of the Annual Monitoring Report.

Response to e-mail of 21 May concerning a revised timetable for the Pre-Hearing Meeting and Hearing Sessions:

Given the impact of the delay in the Core Strategy programme, in terms of “losing” the whole document; the Council is of the opinion that the cost of effectively withdrawing the Core Strategy outweighs the risk of the Core Strategy being found unsound. The Council is therefore happy for the Examination of the Core Strategy to continue pending the outcome of the Exploratory Meeting.

Taking account of the work the Council is undertaking we would hope that by the time of the Exploratory Meeting we will be able to give you the reassurance and confidence that it will be appropriate to hold the Pre-Hearing Meeting before the deadline of November 2009.

With respect to the exact timing of the Pre-Hearing Meeting, in relation to the current issues under discussion, the last information which we expect to provide you with is any proposed changes to the affordable housing policy on 5 August 2009.

Yours sincerely

Martin Howell
for Borough Planner