

Comment

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Comment by	Mr Angus Robertson (1308555)
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Do you consider the Local Plan is legally compliant? No

Do you consider the Local Plan is sound? No

If you have entered 'No' to the above, please answer the below. Otherwise, please go to the next question. Do you think the Local Plan is unsound because it is not: (Please tick all that apply)

- Positively prepared
- Justified
- Effective

Do you consider the Local Plan complies with the duty to co-operate? Yes

Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.

If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Why the Area Strategy for Roehampton and Alton Estate Regeneration Area is not sound:

Two of the tests for soundness are that the Plan is;

'Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs.....'and;

‘Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’.

Under the Vision for the Area Strategy for Roehampton and Alton Estate Regeneration Area, section 9.12.2 states an objective as ‘Promoting the replacement of poor-quality housing stock’. However, no objective assessment has been provided (within the draft Plan or in any of the supporting documentation) to objectively demonstrate the ‘poor quality’ of the housing stock and no evidence has been presented to assess whether there is or is not a need to replace this housing stock. Furthermore, no alternatives to the ‘replacement of housing stock’ have been assessed to demonstrate that the replacement of the housing stock is an appropriate strategy.

Furthermore, another test for soundness is that the Plan is ‘*Effective - deliverable over the plan period.....*’. The Local Plan and the Area Strategy for Roehampton and Alton Estate Regeneration Area, as drafted, presumes that the specific regeneration plan for the Alton Estate will and should happen. Not only is it inappropriate for a Local Plan to rely on a specific regeneration route in this way but also, the proposed Regeneration of the Alton Estate has not happened although it has been proposed and discussed for nearly 18 years. It is therefore inappropriate to assume that it will now, during the term of this Local Plan.

As a result, this section of the Plan and this key objective for the Area Strategy is neither ‘positively prepared’ nor ‘justified’ nor ‘effective’ and as a result I think it is not sound.

Why the Area Strategy for Roehampton and Alton Estate Regeneration Area is non-compliant:

The draft Local Plan references the commitments and targets of the Wandsworth Environmental & Sustainability Strategy (WESS) and associated Action Plan. The strategy states that ‘the Wandsworth Local Plan is the main framework for sustainable development’, with a target for ‘developments reaching zero-carbon building targets’.

Furthermore, in the draft Plan Policy LP10, ‘Responding to the Climate Crisis: Sustainable Construction and Design’ states that ‘In order to mitigate the effects of climate change and achieve the Council’s target of becoming a zero-carbon borough by 2050, development proposals should;.....5. Retain existing buildings and their embodied carbon in renewal and regeneration projects where this is a viable option.’ And section 15.10 states that ‘The existing building stock in Wandsworth makes a significant contribution to the borough’s carbon emissions and therefore could have a positive role to play through where possible retention and refurbishment. As such, conversions, extensions and refurbishment of existing buildings, including for a different use, present an opportunity to reduce carbon dioxide emissions through retrofitting.’

However, the objectives of the Sustainability Appraisal (SA) published with the draft Local Plan (‘a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives’) whilst dealing with consideration of climate change, do not mention considerations about retaining existing buildings and their embodied carbon or zero carbon building targets. In this context the SA is non-compliant with Wandsworth’s own Environmental Strategy.

Furthermore, the Area Strategy for Roehampton and Alton Estate Regeneration Area takes no account of all of these environmental policy commitments to climate change mitigation, zero carbon building targets or the potential for retrofitting. It has not considered and objectively assessed whether the retention of the existing buildings and their embodied carbon is ‘a viable option’. Instead, it sets the objective of ‘replacement of housing stock’ by an envisioned large-scale demolition with the associated emission of vast amounts of embodied carbon that this would bring.

As a result, neither the Sustainability Assessment nor the Area Strategy for Roehampton and Alton Estate Regeneration Area are legally compliant with Wandsworth’s own Environmental & Sustainability Strategy (WESS).

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified in the question above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

The Area Strategy for Roehampton and Alton Estate Regeneration Area should therefore be modified by removing objective 9.12.2 and replacing it with two new objectives for this Area Strategy; one to objectively assess the exact condition of the existing housing stock, and one to explore the range of different options that could be followed to achieve the vision and objectives of the Local Plan in this area with respect to the existing housing stock.

The Sustainability Assessment should be modified to include a full assessment of the policy commitments made through WESS, including objective for the retention of embodied carbon (when viable) and zero carbon building targets. And the Area Strategy for Roehampton and Alton Estate Regeneration Area should be modified to remove the objective for 'replacement of existing housing stock' and should be replaced by one to objectively assess whether the existing building stock could be retained.

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)