

KEY
 - SITE BOUNDARY

P01	16/11/18	PLANNING
REV	DATE	
CONSULTANTS	NAME	
CLIENT:	TR PROPERTY INVESTMENT TRUST	
CONTRACTOR:	-	
STRUCTURAL ENGINEER:	HEYNE TILLETTS STEEL	
MECHANICAL ENGINEER:	BUILDING SERVICES DESIGN	
COST CONSULTANT:	-	
PROJECT MANAGER:	CONSTRUCTIVE MANAGEMENT	
ACOUSTIC CONSULTANT:	WSP	
CLADDING CONSULTANT:	-	
SPECIFICATION CONSULTANT:	-	
SPECIALIST CONSULTANT 1:	-	
SPECIALIST CONSULTANT 2:	-	
SPECIALIST CONSULTANT 3:	-	

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Job title
FERRIER STREET INDUSTRIAL ESTATE

drawing title / location
EXISTING SITE LOCATION PLAN

drawn by	checked	scale	status
KS	SH	1:1250@A1;1:2500@A3	PLANNING
project	zone	source	classification
14075	-	-	[01] P001 P01

CB/JR/P08078
28th February 2022

Planning Policy Department
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

Dear Sir/ Madam,

London Borough of Wandsworth Local Plan; Publication (Regulation 19) Version Consultation (January 2022)

We write on behalf of our client TR Property Investment Trust Plc (TRPIT), to make representations on the London Borough of Wandsworth Draft Local Plan (Reg 19 version) which is out for consultation. These representations are written with specific reference to the following site:

- **Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW**

Our client acknowledges that their site falls within the proposed Area Strategy for Wandsworth Town which will be managed through the introduction of proposed Policy PM2 (Wandsworth Town, Place Based Policy). Policy PM2(B) highlights six 'key clusters' which include Ferrier Street (Cluster E). The Industrial estate itself is also an allocated site (WT8) within the Wandsworth Town Growth Location. The Draft Local Plan Policy LP4 has also identified several areas in which are suitable for Tall and Mid-rise buildings. The Ferrier Street site is notably absent from these designations and our client seeks to amend the designation to ensure its inclusion.

We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.

The Site

The Ferrier Street Industrial Estate is located within Wandsworth, close to Wandsworth Town Station (see enclosed site ownership and location plan). Ferrier Street comprises 16 x two storey small business units with limited servicing/parking providing circa 800sqm per unit. There is a wide range of existing tenants including catering businesses, tool hire, and motorcycle hire. Whilst the units (on the whole) are in reasonable state of repair, the accommodation is becoming outmoded and is in need of upgrading to better reflect tenant requirements and modern business needs. Furthermore, the existing tenants have expressed that they would prefer improved employment space with more adaptable floorspace with improved access and services arrangements.

The site has been subject to a full planning application for the following works:

Architecture Planning Interiors

Old Church Court, Claylands Road, The Oval, London SW8 1NZ

T 020 7556 1500

www.rolfe-judd.co.uk

'Demolition of existing buildings and construction of mixed use development ranging from 4 to 10 storeys to provide 5826sqm light industrial (Class B1c) use, 5078sqm flexible business (Class B1) use, 106 residential units (Class C3) use and 213sqm retail use (Class A1/A3). Associated public realm works including on-site playspace, enlargement of the station square and alterations to the Ferrier Street ground floor retail frontage of 332 Old York Road'

The application was given resolution to grant in November 2019 subject to completion of a S106 agreement which is currently being finalised. This is acknowledged in the Publication version of the Local Plan and our client welcomes this.

Proposed Area for Review

A number of key changes are sought to the Draft Local Plan which affect the Ferrier Street Industrial Estate site. These changes are summarised below:

- Site Allocation WT8 and Policy PM2;
- Appendix 2 of the Draft Proposed Local Plan
- Policy LP4 Tall and Mid-Rise Buildings

Each of these matters are addressed in more detail in the following sections.

Representation on the Draft Local Plan Document

Site Allocation WT8 and Policy PM2

The draft Wandsworth Local Plan has been reviewed with specific reference to the Ferrier Street Industrial Estate site, which our client owns and is currently planning to build out in accordance with the approved planning permission 2018/5669 once the S106 is agreed.

Our client acknowledges that their site falls within the proposed Area Strategy for Wandsworth Town which will be managed through the introduction of proposed Policy PM2 (Wandsworth Town Place Based Policy). Policy PM2(B) highlights six 'key clusters' which include Ferrier Street (Cluster E). Each cluster brings together a logical geographical grouping of sites. The policy requires emerging proposals to demonstrate how they realise the various area-wide and site-specific priorities and principles within this Area Strategy, with a particular focus on public realm, connectivity and environmental elements of the proposals which must be balanced with new homes and workspace. Our client welcomes the allocation of their site within these key clusters.



Map 4.6 Ferrier Street Cluster

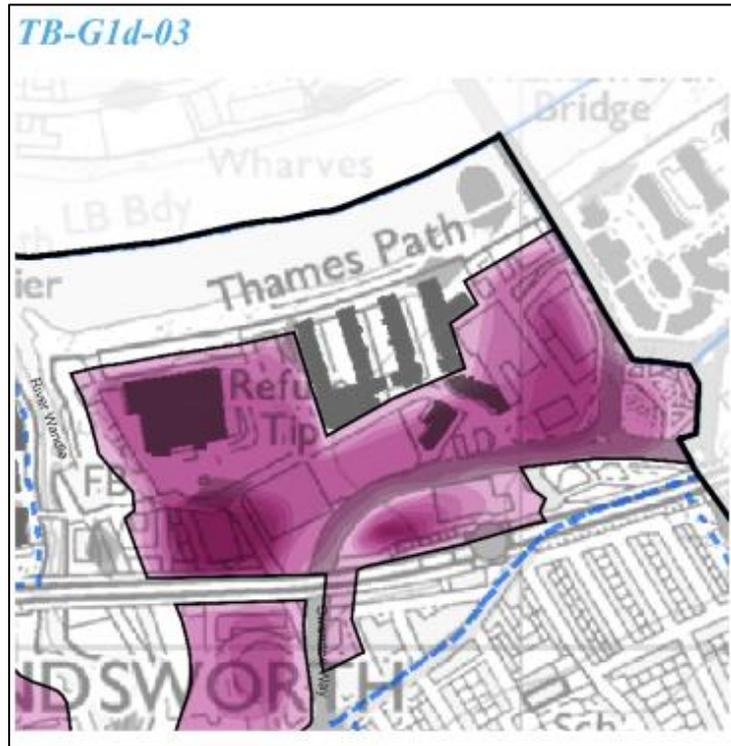
The Industrial estate itself is also an allocated site (WT8) within the Wandsworth Town Growth Location. Page 72-74 of the document outlines the expectations and aspirations for the site in further detail. It is clear that allocation is reflective of our client's approved scheme for the majority of elements, including land use, open space, access, built form and connectivity. This welcomed by our client. However it is noted that 'Context' section acknowledges the following:

'A taller element would be appropriate in the north-western corner of the site adjacent to the railway line.'

Further to this, the 'Building Heights' section states that:

'In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-G1d-03. The maximum appropriate height range for the zone is 7 to 15 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).'

The tall building map (TB-G1d-03) in Appendix 2 referenced above has been shown below.



The property which is located in the north-west corner of the allocation is outside of our client's ownership, however our client would like further clarification as to whether this 'north-west corner' would also include their own properties (Unit 4) at immediately east of the corner building. The proposals map indicates that roughly half of the unit is within this designation.

The current proposals for our client's approved scheme in this location are 6 storeys which would qualify as a 'mid-range building' under draft Policy LP4, however it is considered that this could be increased by virtue of the building being situated away from the conservation area and residential streets, therefore making it very unlikely to detrimentally impact residents or local heritage assets through the addition of more height in this location.

Further to the representations made on the Regulation 18 version of the plan, it is very disappointing that the eastern corner of the site allocation has not been explicitly recognised as a location for a taller element, despite a 10 storey building being approved next to the station within our client's planning application (2018/5669). The height of the building was fully justified by the Townscape and Visual Impact Assessment (TVIA) and associated Tall Buildings Assessment, which the Council's officers and committee members ratified in their recommendations.

The committee report associated with the planning application confirmed that the impact of a building of 10 storeys in this location on the corner of Ferrier Street and Old York Road would create less than substantial harm on the Old York Road Conservation Area and other heritage assets including the Alma.

The building was also assessed against part d. of policy IS3 and DMS4 of the current local plan and the officer concluded:

'the proposed development would result in the redevelopment of the site in accordance with the requirements of the site allocation bringing forward a substantial employment offer with

managed workspace, a high level of affordable housing and a number of public realm improvements which are considered substantial public benefits in accordance with the requirements of the relevant tall building policies, IS3 and DMS4'

Our client would like to ensure that the acceptability of this taller element on the eastern corner of the site is acceptable in principle. This has been firmly established through the planning application process and signed off by planning, design and conservation officers, as well as members of the planning committee so the inclusion of this principle is not considered to be controversial.

Appendix 2 of the Draft Proposed Local Plan

The Regulation 18 version of Site Allocation WT8 recognised that the site has been acknowledged as an area which has 'opportunities for tall buildings' within the Urban Design Study (2020) and Appendix 2 of the emerging Local Plan (Reg18). However, the Regulation 19 version of the plan only recognises the north west corner as being suitable for Tall Buildings. The tall building designation (TB-G1d-03) appears to cover half of Unit 4 which is within our clients ownership but no 'mid-rise' designation is given at all for the properties within the designation.

As set out in the emerging policy wording of LP4, it is suggested that any site outside of this designation would be an inappropriate location for a tall or mid-rise buildings. As the site currently has planning permission for tall and mid-rise buildings (ranging from 3-10 storeys), it is inherently an appropriate location for height which has been tested through the planning application process. The approved development makes a clear justification for height within the existing local context, which the London Borough of Wandsworth has approved as an appropriate site response. Whilst the sensitivities of the surrounding area are acknowledged, the principle for height has already been established on the site, therefore the policy should recognise height in this location as part of the future local context height.



Approved 10 storey element in planning ref. 2018/5669

We therefore implore the Council to recognise the site as having opportunities for tall building within a local context. Appendix 2 should ensure that the 10 storey element to the east of the WT8 is

located within the TB-G1d-03 tall buildings designation and that a mid-rise designation is afforded to the remainder of buildings within the Ferrier Street Industrial Estate.

Policy LP4 Tall and Mid-Rise Buildings

Site Allocation WT8 states that all proposals for tall buildings will be assessed under emerging local plan policy LP4; this is also reiterated in Part 5 of Policy PM2.

The policy defines a 'tall building' as:

'Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings'

The policy defines a 'mid-rise building' as:

'Buildings which do not fall within the definition of a tall building as set out in Part A, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings'

The proposed tall building policy and Appendix 2 identify areas within the Borough where tall and mid-rise buildings are considered acceptable but places a blanket restriction allocation for the rest of the Borough.

This blanket allocation does not consider the nature or appearance of certain areas within the Borough that already have tall buildings. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zone.

The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B. Part D states that buildings should not exceed the appropriate height range identified for each of the tall building zones.

The tall building map has been based on an Urban Design Study (2021) which is a high-level assessment to identify suitable locations for tall buildings in the borough. Part C of the policy restricts any tall buildings outside of these zones, even where they demonstrate they meet the tall building criteria set out in Part B. Part D also restricts tall buildings to the 'appropriate height range' identified for each tall building zone, even if the site demonstrates they meet the criteria set by Part B.

It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of Part B of the same policy. This approach does not accord with the new London Plan.

We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).

The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.

The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.

Summary and Recommendations

In conclusion, our client welcomes their site being included within the Ferrier Street Key Custer and the list of allocated sites. The majority of development aims within the allocations broadly align with our planning permission which is welcomed, however much greater consideration needs to be given to the site's ability to provide additional tall and mid-rise buildings in appropriate locations within the site's boundary, including acknowledgement of the 10 storey building and the associated mid-rise buildings which were approved at committee in November 2019 – these appear to have been overlooked in this instance.

We make the following recommendations:

- Recognise the Ferrier Street Industrial Estate as being an appropriate location for Tall and Mid-rise buildings through allocation within TB-G1d-03 and a new mid-rise allocation;
- Incorporate flexibility within policy LP4 to allow for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the clarifications following its implementation;
- Recognise the significant financial constraints the redevelopment of this former industrial site will incur, which will result in significant densities for the site allocation area to come forward and deliver the public benefits.

We would welcome the opportunity to meet with the Wandsworth Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. Any future Local Plan should recognise the scale of development, and the mix of uses already established through the extant planning permission for the site.

We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully,



For and on behalf of
Rolfe Judd Planning Limited

c.c TR Property Investment Trust Plc (TRPIT)



Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title	c/o agent	Mr
First name		Chris
Last name		Brown
Job title (where relevant)		Senior Planner
Organisation (where relevant)	TR Property Investment Trust Plc	Rolfe Judd Planning
Address		Old Church Court Claylands Road Oval London
Postcode		SW8 1NZ
Telephone		██████████
E-mail address		████████████████████

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.wandsworth.gov.uk/privacy

Part C: Your Response

4. Do you consider the Local Plan is:

4.1 Legally compliant	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.2 Sound	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.

If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.

5. Do you think the Local Plan is unsound because it is not:

(Please tick all that apply)

5.1 Positively prepared	<input type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input type="checkbox"/>
5.4 Consistent with national policy	<input type="checkbox"/>

6. 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.

Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.

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.

We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D). The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate. The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C. We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.

Please refer to accompanying statement for further details

Please continue on a separate sheet / expand the box if necessary.

7. 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 at 5 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.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.

Please continue on a separate sheet / expand the box if necessary.

8. 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)

Yes, I wish to participate in hearing session(s)

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.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

Chris Brown

For electronic responses a typed signature is acceptable.

Date:

28/02/2022



Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is 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.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.