

PD10633/JE/ED

Email: 

28 February 2022

Planning Policy
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

Sent via email to planningpolicy@wandsworth.gov.uk

Dear Sir / Madam,

**'PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19) CONSULTATION
REPRESENTATIONS IN RESPECT OF THE WINSTANLEY AND YORK ROAD REGENERATION PROJECT**

These representations are submitted by Montagu Evans on behalf of the Winstanley and York Road Regeneration LLP ("the JV") in respect of the Winstanley and York Road Regeneration Project ("the Estate Regeneration Project"), a joint venture ("the JV") between Taylor Wimpey and the London Borough of Wandsworth.

The representations are submitted on behalf of the JV as they wish to maintain their position as a key stakeholder in the comprehensive regeneration of the Winstanley / York Road Regeneration Area.

BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS

The Winstanley and York Road Regeneration project dates back to 2012. The Council's key strategic aim was to produce a comprehensive masterplan to tackle the range of issues that are contributing to levels of deprivation and lack of opportunities on the Winstanley and York Road Estates.

Planning permission (ref. 2017/6864) was granted for the first phase of the regeneration project at Land North of Grant Road on 1 August 2018. This permitted the construction of three buildings ranging from 6 to 20 storeys in height, comprising mixed use development including a total of 139 residential units (including 46 affordable units), a 5,175sqm school and chapel and 219 sqm of flexible commercial uses. These buildings are now completed.

On 29 January 2021, a further hybrid planning permission (ref. 2019/0024) was granted for the main phases of the regeneration project which permits up to 2,550 residential units with 35% of these being affordable units together with a new leisure and community centre as well as new park at the centre of the scheme. The approved masterplan will, at a rudimentary level, replace poor quality out-of-date housing stock with new modern energy efficient housing which meets and exceeds typical housing standards. The first of the approved blocks (Block 5) under this permission is to be constructed over coming months with completion targeted for the end of 2023.

The JV has worked collaboratively with LBW and other key stakeholders from the beginning of the project to build on the aspirational master planning process carried out by the Council to secure a consent which will deliver major improvements to the physical environment, along with new leisure and communities, and much needed affordable housing. The JV is

keen to continue engaging with the Council to facilitate the successful delivery of the masterplan project and create an attractive new neighbourhood for existing and new residents.

We have reviewed the relevant sections of the Regulation 19 draft Local Plan and set out our position on the sections below.

EMERGING POLICY PM4 (CLAPHAM JUNCTION AND YORK ROAD / WINSTANLEY REGENERATION AREA)

Part B of Policy PM4 (Clapham Junction and York Road / Winstanley Regeneration Area) relates to inclusive growth and outlines that development within Clapham Junction and York Road/Winstanley Regeneration Area has capacity to provide 2,995 homes by 2032/2033, over the first 10 years of the Plan period. We are of the view that these figures should be stated as “providing a minimum of 2,995 homes...”, which the Council should seek to exceed in order to ensure that housing growth is accommodated in areas with the greatest public transport connectivity and capacity in the Borough, and to reflect the significant number of new homes which will be delivered as part of the regeneration project and the wider Clapham Junction and York Road/Winstanley Regeneration Area.

EMERGING SITE ALLOCATION CJ5 (WINSTANLEY / YORK ROAD REGENERATION AREA, SW11)

The area which is the subject of the Estate Regeneration Project is allocated within the ‘Publication’ Draft Local Plan under emerging site allocation CJ5 (Winstanley / York Road Regeneration Area, SW11). Our client supports the allocation for mixed-use development comprising mixed tenure housing, a leisure centre and cultural, commercial and health uses along with convenience shopping, a library, community facilities and open space.

Paragraph 6.71 of emerging site allocation CJ5 relates to building heights and states that:

“In accordance with the tall building maps in Appendix 2, the site is located in tall building zone TB-B1-01. The maximum appropriate height range for the zone is 7 to 20 storeys, and the 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 approved masterplan (ref. 2019/0024) consented substantially taller buildings of up to 32 storeys in height, and it follows that buildings in excess of 20 storeys have been considered appropriate on this site. It may be more appropriate for the height policy to give clearer recognition that the heights are based on the Urban Design Study which does not take account of the full range of considerations relevant to determining the acceptability of the height of tall buildings. In addition, the role of tall buildings in contributing towards the supply of new homes in the Borough and the delivery of significant physical, social and economic benefits associated with the wider regeneration of the estates should be recognised further in the site allocation.

Paragraph 6.65 of emerging site allocation CJ5 states: **“Relevant Management Plans** – Any proposals will be required to comply with the guidance set out in the approved York Road / Winstanley Regeneration Area Masterplan and the Lombard Road / York Road Riverside Focal Point Supplementary Planning Guidance (2015).” It is unclear, however, what documents make up the ‘guidance’ within the approved York Road / Winstanley Regeneration Area Masterplan that proposals are required to comply with and our client would like this to be clarified.

EMERGING SITE ALLOCATION CJ3 (LAND ON THE CORNER OF GRANT ROAD AND FALCON ROAD, SW11)

The initial master planning exercise for the regeneration of the Winstanley / York Road Estates also included an area known as Bramlands, which is located directly to the north of Clapham Junction station and is allocated within the 'Publication' Draft Local Plan under site allocation CJ3 (Land on the Corner of Grant Road and Falcon Road, SW11).

This site has the potential to facilitate and support the objectives of the Estate Regeneration Project due to its proximity and relationship to the site. However, it also has the potential to contribute to the Plan's growth objectives through the delivery of a dense development which takes advantage of its highly sustainable location next to an existing transport hub, in line with the national policy which requires planning policies and decisions to optimise development potential. In this regard, our client considers that the emerging site allocation should be clear that the development of this site should be design and townscape led, in accordance with the London Plan's approach to optimise capacity for site allocations, and considered in the context of the wider Estate Regeneration Project. Our client supports the inclusion of part of the site within the Urban Heart Masterplan boundary and looks forward to working with the Council and Partners to help unlock its capacity for growth and contribution to the wider Estate Regeneration Project.

The emerging site allocation recognises the potential for development or meanwhile uses in the short-medium term as part of the phased development of the site following confirmation of the likely delivery period for Crossrail 2. Our client welcomes the recognition of opportunities for development of the site in the short-term to contribute towards housing need to achieve the growth objectives of the Plan, and we would welcome a flexible approach in bringing forward development in order to avoid sterilisation of the site as a result of the ongoing uncertainty surrounding the delivery of Crossrail 2.

We also note that *Map 6.1 Spatial Area Map: Clapham Junction and Winstanley / York Road Regeneration Area – Inset Map* at page 146 of the Plan refers to the site as 'No.4' instead of 'No.3' and request that this is amended for consistency with Map 6.2.

EMERGING POLICY LP4: TALL BUILDINGS AND THE COUNCIL'S URBAN DESIGN STUDY

Supporting Paragraph 14.28 of the 'Publication' Draft Local Plan recognises that some developments will have different floor heights, particularly at the ground floor. To ensure that this is reflected throughout the Plan, we suggest that supporting paragraph 14.34 is amended as follows:

"14.34. The heights expressed in all parts of this Policy assume an average storey height of three metres. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. Applications for tall buildings will be required to express the height of buildings in ~~storeys and~~ metres."

SUMMARY

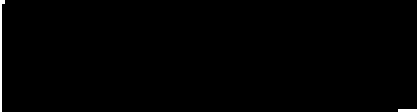
The representations are submitted on behalf of the JV in respect of the Winstanley and York Road Regeneration Project.

The JV have requested that we make representations on the 'Publication' Draft Local Plan as they wish to maintain their position as a key stakeholder in the comprehensive redevelopment of the Winstanley / York Road Regeneration Area.

On behalf of the JV, we welcome the recognition within the 'Publication' Draft Local Plan of the opportunities to accommodate growth and support renewal and regeneration within the York Road/Winstanley Regeneration Area. The JV is keen to continue working collaboratively with the Council to help facilitate this growth and ensure the successful delivery of the masterplan project to create an attractive new neighbourhood for both existing and new residents.

We welcome the opportunity to discuss the content of these representations further with the London Borough of Wandsworth and are keen to be involved in the forthcoming examination process. In the meantime, should you wish to discuss any of the above please do not hesitate to contact either Jeremy Evershed (jeremy.evershed@montaguevans.co.uk / 07818 012 549) or Emily Disken (emily.disken@montagu-evans.co.uk / 07818 012 424) in the first instance.

Yours sincerely,



MONTAGU EVANS LLP