

WANDSWORTH

Soundness Self-Assessment Checklist

Local Plan Publication (Regulation 19) Version
April 2022



PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **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 areas 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 [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

KEY QUESTIONS		Assessment
Growth Strategy		
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The Plan contains seven ‘place-based’ and two overarching Area Strategies, covering each of the borough’s town centres and regeneration areas, which are the key spatial areas of change and/or strategic focus. These provide a framework for how new development should be designed and planned for in order to meet the Plan’s Vision and Objectives, steering growth through a coherent placemaking approach. The Strategies include Site Allocations for key sites and are expected to provide 18,342 homes over the Local Plan period. Outside of these areas, the small sites windfall accounts for 20% of the housing capacity.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	The Area Strategies represent the key areas of growth and regeneration in the borough, where opportunities exist to increase capacity and density, to enhance the quality of the place, and to bring benefits to local communities. The Area Strategies focus on the most accessible and well-connected places, making effective use of existing public transport infrastructure and planned enhancements. An assessment of the local context and character, as well as availability of sites, has informed the growth capacity of each Area Strategy – and thus the distribution of development. This is set out in Policy SDS1 (Spatial Development Strategy 2023-2028).
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>The Local Plan sets out detailed planning guidance for seven Area Strategies: Wandsworth Town (including the Wandle Delta sub-area); Nine Elms; Clapham Junction and York Road / Winstanley Regeneration Area; Putney; Tooting; the Roehampton and Alton Estate Regeneration Area; and Balham. The areas selected reflect their strategic importance and the Strategies set out how each area will accommodate change, rather than necessarily promoting growth. The Local Plan does not anticipate growth to occur equally across these locations and the total capacity of the areas (as informed by the Housing and Economic Land Availability Assessment, January 2022) is identified in Policy SDS1. The main growth areas are Nine Elms, Wandsworth Town (including the Wandle Delta sub-area), Clapham Junction, and the contribution made from boroughwide small sites.</p> <p>The Local Plan is not reliant on any single site allocation, nor on the provision of specific infrastructure required to support the delivery of the growth it plans for.</p>

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The spatial strategy for delivering growth is clearly articulated. The policy foregrounds a town centre first approach (2.66) and contains Area Strategies (2.67), which are both linked to realising the stated vision and objectives. Site Allocations are further identified as key sites to deliver the spatial strategy (2.68). Area Strategies and Site Allocations are set out in detail in chapter 4 and considered cumulatively in Policy SDS1. Policies relating to topics provide further guidance for how sustainable development is to be delivered in Wandsworth. Both topic-based policies and the Area Strategies are assessed against reasonable alternatives as part of the Sustainability Appraisal (January 2022) , which considers how they will achieve sustainable development.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The amount of development that has been identified within the Local Plan is set out for growth areas (in Part B of SDS1), however not for individual site allocations. Capacities have been identified through a design-led approach, which is clearly explained within the Urban Design Study (December 2021) . Information relating to individual sites has been identified as part of the Housing and Economic Land Availability Assessment (January 2022) process, and is used to inform borough-wide capacity, however this has not been published.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: If helpful, capacities for individual site allocations could be made available to the Planning Inspector.				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		The Local Plan uses the London Plan target, in accordance with that document. The Local Housing Needs Assessment (December 2020) considered figures from the standard method. The capability of the Local Plan to meet the identified need (London Plan targets) has been assessed as part of the HELAA (January 2022) . Based on this work, sufficient capacity exists to meet (and exceed) the housing requirement, which is itself a minimum, with an appropriate and justified buffer. It is not considered that the extent of the positive cumulative projected completions justifies a higher than planned for growth level due to the need to account for fluctuations in the market over the plan period, particularly within the first 5 years.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: A commitment is made to review the Local Plan against any revised London Plan targets in paragraph 2.105.				
		Reviewer Comments:				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This is set out within the Site Allocations Methodology Paper (January 2022) . This document sets out how the sites were identified, including with regard to their potential to address the Sustainability Appraisal scoped sustainability objectives. The Sustainability Appraisal for the Draft Local Plan (Regulation 19) (January 2022) appraises the site allocations (collectively by Area Strategy area) against a framework for the delivery of sustainable development.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council designated the Tooting Bec and Broadway Neighbourhood Area and Forum on 4 April 2017. To date, no neighbourhood plan has been progressed by the Forum, and whilst the neighbourhood area designation remains, the Forum's designation has now expired given this was made more than 5 years ago, and no application for renewal has been received.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: To provide an indicative figure in line with paragraph 67 if requested by a designated neighbourhood forum (existing or potential), in line with the NPPF advice.				
Reviewer Comments:						
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
7.	<p>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</p>	<p>Reason for score: Site allocations do not prescribe a quantum of development, however it is clarified that this should be established through a design-led approach for each site as required by the Local Plan’s topic-based policies (paragraph 3.13), and the allocations include specific design requirements. Development considerations (and the allocation itself) set out the appropriate mix of uses and any supporting infrastructure required. The borough’s Housing and Economic Land Availability Assessment (January 2022) identifies an indicative quantum for each site to inform borough-wide capacity, however in line with the above this has not been included within the Local Plan.</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right: Should it be necessary, very high level indicative quantums, as informed by the HELAA, could be identified within the Local Plan. These should not serve as maximums, however, and would still be subject to more detailed site-specific design-led assessment as part of a planning application.</p> <p>Reviewer Comments:</p>				
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this ‘need’ target?</p>	<p>Policy SDS1 Spatial Development Strategy 2023-2038 sets out the housing requirement for the local authority as a whole – of 20,311 new homes. This is derived from the London Plan target of 1,950 new homes per year up until 2028/2029, including on small sites; and then is derived from the 2017 SHLAA and a rolled over small sites target of 414 new homes per a year for the remaining years of the Local Plan period. It is expected that the London Plan will be revised prior to 2028/2029 and an associated revision of the Local Plan will account for the revised London Plan target. The housing requirement is set in accordance with the London Plan.</p> <p>For economic/employment land, the identified need is derived from the Employment Land and Premises Study (October 2020). This sets out a need for an additional 22,500 sqm of office floorspace in the non-CAZ areas of the borough, and for up to 8.6 ha of land required for industrial and related purposes, based on an identified additional floorspace need of 35,700 sqm for core industrial uses and up to 2.1 ha of land for waste. These targets are set out within the relevant chapters.</p>				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: It is considered that the Local Plan can deliver these targets. For housing, capacity is established within Policy SDS1, which sets out the totals by for each of the Area Strategy areas (repeated within these sections). These demonstrate that the targets are deliverable, with capacities for individual site allocations informed by the design-led approach which the Local Plan advocates, and set out within the borough’s Housing and Economic Land Availability Assessment (January 2022) .				
		For economic/employment uses, site allocations set out requirements for increases in industrial floorspace which is supported by robust protection elsewhere. These indicatively demonstrate enough capacity to meet demand. For office floorspace, potential capacity – including as part of allocated sites – exceeds demand (although policies do not require it to be delivered as such). Further information on capacities is set out within the Housing and Economic Land Availability Assessment (January 2022) .				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan does not require specific (larger-scale) infrastructure to deliver the planned growth; however the borough’s Infrastructure Development Plan (January 2022) outlines the pipeline infrastructure that will assist in doing so. Infrastructure requirements for Nine Elms are set out within the Nine Elms Battersea Development Infrastructure Requirements Refresh Study 2019/2020 (November 2021).				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
10.	<p>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This information is set out within the borough's Infrastructure Delivery Plan (January 2022) .				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
Process and Outcomes (see also Toolkit Parts 2 and 3)						
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	These matters are set out in detail in the Duty to Cooperate Statement (January 2022) , further update forthcoming in support of submission, and the forthcoming Statements of Common Ground with Wandsworth's neighbouring authorities and other bodies. The latest versions will be included as part of the documents submitted to the Planning Inspectorate.				
11.	<p>Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: These matters are set out in detail in the Duty to Cooperate Statement (January 2022) , further update forthcoming in support of submission, and the Statements of Common Ground with Wandsworth's neighbouring authorities and other bodies.				
Implications of taking no further action:						

		Assessment				
	KEY QUESTIONS	<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Should unexpected issues arise, these can be addressed through further Statement of Common Ground as part of the examination process.</p>				
		<p>Reviewer Comments:</p>				
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>The Local Plan does not derive the housing requirement by using the standard method for housing targets; instead using the London Plan targets (see Policy H1, which provides justification for this approach).</p> <p>The Local Plan protects certain sub-uses within Use Class E, which may be considered contrary to national policy. This is supported by robust evidence which demonstrates need (e.g. requiring the protection of industrial uses in existing industrial areas), and – at any rate – is justified by paragraphs within the NPPF which require LPAs to meet this need; see paragraphs 82 (economic land) and 86 (town centre uses).</p>				
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Many of these issues have been resolved through Duty to Cooperate engagement with relevant bodies, however one issue of non-conformity has been raised during the Regulation 19 consultation and is likely to be raised during the examination. This is the approach set out in Policy LP 34 Managing Land for Industry and Distribution, which permits co-location of office and industrial within the area designated as the Battersea Design and Technology Quarter, located within the Queenstown Road, Battersea SIL. This is contrary to London Plan Policies E5 and E7. The GLA have stated that they require this area to be de-designated as SIL in order to permit co-location of industrial and non-industrial uses, however the LPA consider this to be a local approach. Both bodies have agreed to work further on this to resolve through a SOCG as part of the examination process.</p>				

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The GLA have also asked that Wandsworth are 'more proactive' on addressing the identified waste capacity gap; however this will not be identified as an issue of non-conformity. The Council has produced further evidence in the form of an addendum to the waste evidence to show how options have been exhausted and, as such, that the position regarding the how the waste capacity gap is met is justified.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Continued engagement with the GLA around the issue of the BDTQ, including through involving them in the study currently being delivered by PRD on behalf of the Economic Development Office.</p>				
		<p>Reviewer Comments:</p>				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan has been prepared in accordance with the Council's other strategies. This is clearly set out within the section 'Links with Council Vision and other Key Strategies' (paragraphs 2.29 to 2.55). There are no made neighbourhood plans within the borough.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
		<p>Reviewer Comments:</p>				
14.	<p>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: This is set out within the borough's Pre-Publication Draft Local Plan Consultation Statement (January 2022), including a detailed appendix with officer responses to each of the representations made (Appendix 5), and the Issues Document Consultation Statement (November 2020). The consultation has been delivered in line with the Council's Statement of Community Involvement (February 2019). A consultation reports in support of the</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>consultation undertaken on the Publication (Regulation 19) Local Plan will be submitted to the Planning Inspectorate as part of the submission of the Local Plan.</p>				
		<p>Implications of taking no further action: It is noted that a number of representations were erroneously not originally included within the Consultation Report, including representations from Thames Water.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: An addendum has been added to incorporate the missing responses to Transport for London Commercial Development, and ongoing cooperation with Thames Water will resolve queries raised in their representation via the Council’s intention to respond to the Regulation 19 representations.</p>				
		Reviewer Comments:				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Yes, the Sustainability Appraisal for the Draft Local Plan (Regulation 18) (November 2020) and the Sustainability Appraisal for the Draft Local Plan (Regulation 19) (January 2022) sets out a clear framework for the assessment of the Local Plan and the delivery of sustainable development. It assesses the objectives of the Local Plan, the policies, and the site allocations (the latter considered collectively within each Area Strategy area).</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Yes, the Sustainability Appraisal assesses both the policies and proposals set forward elsewhere in the Local Plan, for example in the Area Strategies (see parts 4 and 5).</p>				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Sustainability Appraisal states in the Non-Technical Summary that the “development and appraisal of the Plan is an iterative process, with the policies being refined to take account of appraisal and consultation”. A column in the Sustainability Appraisal ‘Mitigation’ sets out further changes that could improve the policies in relation to the sustainability objectives.				
		The Sustainability Appraisal also assesses the policies and reasonable alternatives (including a ‘status quo’ approach), ensuring that the most sustainable option has been chosen.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: An Equality Impact and Needs Assessment was produced to accompany the Regulation 18 and 19 versions of the Local Plan (November 2020 and January 2022, respectively). These set out negative aspects of the policies and appropriate mitigation measures, which are included as actions (section 4). These are marked as complete where the Plan has been amended in response.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
		-2	-1	0	+1	+2
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A Habitats Regulation Assessment was produced to accompany the Regulation 18 and 19 version of the Local Plan (November 2020 and January 2022, respectively). This assessed the Local Plan policies, both for their impact alone and in combination with other plans / projects (e.g. neighbouring authorities' Local Plans / screening assessments of these documents), whilst also taking account of other documents (e.g. the London Plan HRA). The screening assessment does not identify any likely significant effects or impacts on the integrity of any European Site.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The screening assessment does not identify any likely significant effects or impacts on the integrity of any European Site, and mitigation is therefore not identified (see Table 2).				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
21.	<p>Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Paragraph 10 of the HRA (January 2022) states that it was undertaken “during the preparation of the Local Plan – Publication version, so that the assessment could influence the development of policies and their effects”. The assessment did not identify any significant adverse effects, and changes to the Local Plan were therefore not required.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
		<p>Reviewer Comments:</p>				
<p>Housing Strategy</p>						
22.	<p>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [<i>for instance, because another local authority has agreed to plan for your unmet need</i>], can you explain and robustly justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: It is considered that the Local Plan can deliver these targets. For housing, capacity is established within Policy SDS1, which sets out the totals by for each of the Area Strategy areas (repeated within these sections). This information is derived from the Housing and Economic Land Availability Assessment (January 2022), and demonstrates that the targets are deliverable. The capacities are informed by information taken from planning application or through a design-led approach (see the Urban Design Study, December 2021), which the Local Plan advocates through its policies.</p>				
		<p>Implications of taking no further action for local plan soundness and/or effectiveness:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
<p>Reviewer Comments:</p>						
G	<p>Is there any unmet need in neighbouring areas that you have been formally asked to</p>	<p>During earlier Duty to Cooperate discussions (January 2021), the London Borough of Merton formally requested whether Wandsworth could provide help in meeting their housing requirement (reiterating a request initially made in December 2019). Wandsworth was unable to help at either time. In subsequent discussions (November 2021),</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	accommodate? If yes, then list the amount by each local authority area.	Merton have clarified that they are now no longer seeking help from Wandsworth to meet their housing target (owing to the adoption of a stepped approach in consultation with the GLA).				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Housing Trajectory demonstrates a 5-Year supply and the expected rate of housing delivery. The housing trajectory is set out within the Council's 2020/21 Authority Monitoring Report . The housing trajectory accounts for the design-led capacity work that has been undertaken and which informed the Council's HELAA. Policy SDS1 and its supporting text sets out how housing is to be delivered and implemented.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Housing Trajectory and HELAA demonstrate both (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption and (ii) that beyond this 5-year period sites are				

		Assessment																								
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>																								
	<p>relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</p>	<p>developable. Projected completions are forecast to be in excess of a 5% buffer in accordance with NPPG Paragraph: 022 Reference ID: 68-022-20190722.</p>																								
		<p>Implications of taking no further action:</p>																								
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>																								
		<p>Reviewer Comments:</p>																								
<p>26.</p>	<p>Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?</p>	-2	-1	0	+1	+2																				
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement																				
		<p>Reason for score: Yes, ‘headroom’ is provided to ensure the full requirement will be met during the Local Plan period, as follows:</p>																								
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Phase</th> <th style="text-align: left;">Years</th> <th style="text-align: left;">Target</th> <th style="text-align: left;">Definition of target</th> <th style="text-align: left;">Capacity (derived from HELAA)</th> </tr> </thead> <tbody> <tr> <td>Y1 to Y5</td> <td>2023/24 – 2027/28</td> <td>9,750</td> <td>annualised to 1,950 (where 1,950 is the adopted London Plan target)</td> <td>14,307</td> </tr> <tr> <td>Y6 to Y10</td> <td>2028/29 – 2032/33</td> <td>5,778</td> <td>1 year 1,950 and 4 years 957 per year.</td> <td>6,895</td> </tr> <tr> <td>Y11 to Y15</td> <td>2033/34 – 2037/38</td> <td>4,785 (20,313)</td> <td>annualised to 957 per year.</td> <td>3,180 (24,382)</td> </tr> </tbody> </table>					Phase	Years	Target	Definition of target	Capacity (derived from HELAA)	Y1 to Y5	2023/24 – 2027/28	9,750	annualised to 1,950 (where 1,950 is the adopted London Plan target)	14,307	Y6 to Y10	2028/29 – 2032/33	5,778	1 year 1,950 and 4 years 957 per year.	6,895	Y11 to Y15	2033/34 – 2037/38	4,785 (20,313)	annualised to 957 per year.	3,180 (24,382)
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<p>Mitigation / Action required (if necessary) to move scale to right:</p>																										
<p>Reviewer Comments:</p>																										
<p>27.</p>	<p>Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?</p>	-2	-1	0	+1	+2																				
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		<p>Reason for score: The Local Plan assumes a windfall delivery of 414 dwellings per year (London Plan, Table 4.2), which forms part of the borough’s housing requirement. Paragraph 4.2.3 of the London Plan states that: “The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework 2019”. This annualised windfall delivery has been incorporated within the borough’s Housing and Economic Land Availability Assessment (January 2022), adjusted to remove any small site applications that have been identified through the planning pipeline.</p>																								
		<p>Implications of taking no further action:</p>																								

KEY QUESTIONS		Assessment				
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		Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policy LP24 Housing Mix sets out the requirement for the dwelling size / tenure mix that should be created by development proposals, including with respect to market and affordable housing. This has been informed by the Local Housing Needs Assessment (December 2020) and subsequent First Homes update (December 2021) .				
		Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments:				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The housing requirements of different groups are taken into account, including through policies LP31 Specialist Housing for Vulnerable People and LP 32 Traveller Accommodation. The former covers sheltered housing, residential care homes, nursing homes, dual-registered care homes, extra-care homes, and requires that applicants for specialist and supported housing can robustly demonstrate that the accommodation meets an identified need, having regard to the evidence set out in the Council’s most up-to-date Local Housing Needs Assessment (October 2020) . The latter policy is informed by the borough’s Gypsy and Traveller Accommodation Needs Assessment (April 2019, updated January 2022) (with a further April 2022 update to be sent to the Planning Inspectorate as part of the Local Plan submission). Policy LP28 Purpose Built Student Accommodation also sets out the framework for purpose-built student accommodation, recognising that an insufficient provision for university students could place additional pressure on the lower end of the private rented sector.				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<p>30.</p> <p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>		<p>Reason for score: Policy LP23 Affordable Housing seeks to maximise the delivery of affordable housing from new development across the borough to meet the identified need in the Council’s Local Housing Need Assessment. There is a significant shortage of affordable housing, and an urgent need to boost supply to meet the need of a diverse population. This means a greater variety of affordable housing products and well-designed homes of the right size, tenure and a price that people can afford. Government policy requires a proportion of First Homes, and the London Plan requires that affordable housing provision is focused on genuinely affordable tenures including low cost rented products and intermediate products. The Council will seek to prioritise these tenures, but recognises that genuinely affordable homes can cover a broad spectrum of affordable housing types, as defined in the NPPF. There are no geographical variations within the policy.</p> <p>The Local Housing Need Assessment identifies a total net need of 3,575 dwellings per annum, and breaks down to 2,327 affordable rented dwellings and 1,248 affordable home ownership units per annum between 2019 and 2037. This overall need exceeds the borough’s housing target set out in the London Plan. Such circumstances are recognised by the national policy, which requires the Council to set affordable housing targets that are realistic. The tenure split set out in the policy reflects national and regional guidance, and has been tested as part of the Whole Plan Viability Assessment (January 2022), and found to be broadly realistic within the scope of the policies set out, with viability improving as time progresses.</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
31.	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Policy LP32 Traveller Accommodation sets out the approach for Travellers. This is consistent with the Government’s policies for meeting the housing needs of Travellers as set out in ‘Planning Policy for Traveller Sites’ (2015) and Policy H14 of the London Plan. It is informed by the Gypsy and Traveller Accommodation Needs Assessment (2019, updated January 2022) (with a further April 2022 update to be sent to the Planning Inspectorate as part of the Local Plan submission), which indicates that there is currently no evidenced requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough.</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
32.	<p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: As informed by the Gypsy and Traveller Accommodation Needs Assessment (2019, updated January 2022) (with a further April 2022 update to be sent to the Planning Inspectorate as part of the Local Plan submission), there is currently no evidenced requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough.</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
H	<p>List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery</p>	<p>The Council has a long-established Traveller site at Trewint Street which accommodates 11 residential pitches, one of which is vacant. As above, based on the Gypsy and Traveller Accommodation Needs Assessment (2019, updated January 2022) (with a further April 2022 update to be sent to the Planning Inspectorate as part of the Local Plan</p>				

KEY QUESTIONS		Assessment				
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		submission), there is currently no evidenced requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough.				
Justified approaches to plan policy and content						
33.	<p>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Various policies include thresholds which trigger certain policy requirements, however these are considered to be justified by proportionate evidence and appropriately explained within the supporting text. These policies include the following:</p> <ul style="list-style-type: none"> LP4 Tall and Mid-rise Buildings: Thresholds for what constitutes ‘tall’ and ‘mid-rise’ buildings are based on local evidence provided within the Urban Design Study (December 2021). This is clarified within the supporting text. LP7 Residential Development on Small Sites: Small sites are defined as those less than 0.25ha, in accordance with the London Plan. Thresholds for policy support for the redevelopment of existing residential properties are set by an original floorspace of 130sqm or where the proposal would provide an uplift in the number of family sized dwellings with direct access to a dedicated rear garden of at least 15sqm. The supporting text clarifies that this approach is aligned with the conversions policy as set out in Policy LP26 (Conversions) and justified by appropriate evidence. LP25 Protecting the Existing Housing Stock: Sets a threshold whereby the net loss of self-contained residential dwellings will be acceptable if the proposals involve no more than two non-family-sized dwellings in order to create a family-sized dwelling and the total floorspace of the new dwelling created will be less than or equal to 130sqm. This is related to Policy LP26 (Conversions), as below. LP26 Conversions: Conversion of any dwelling into flats is only appropriate for dwellings of 130sqm or less of floorspace (as originally constructed), and direct access to a garden of at least 15sqm is provided. It is explained within the supporting text that this is to ensure that the conversion of properties is not achieved at the expense of family-sized accommodation, of which there is an identified need. The threshold is set to align with the sizes set out in the Nationally Described Space Standards, and is in alignment with standards 				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>set for conversions within the policies of other London boroughs. The standard relates to buildings as originally constructed, which removes ambiguity around later extensions and additions.</p> <ul style="list-style-type: none"> • LP10 Responding to the Climate Crisis: BREEAM standards are required on non-residential buildings over 100sqm, in alignment with the definition of major development (The Town and Country Planning (Development Management Procedure) (England) Order 2010). All new major development is required to achieve zero carbon standards, with a minimum on-site reduction in carbon emissions of 35%. This is consistent with the London Plan. All non-major residential development provided in new building should achieve a minimum on-site reduction in carbon emissions of 35%. The Council declared a Climate Change Emergency in 2019 and produced the 'Wandsworth Environment and Sustainability Statement 2019-2030' which sets out the ambition to be a carbon neutral council by 2030 and a zero emission council by 2050. These Local Plan targets will help reduce greenhouse gas emissions and work towards being zero emissions. • LP28 Purpose-Built Student Accommodation: This policy adopts a threshold approach following that set out in London Plan Policy H15. • LP38 Affordable and Open Workspace: The policy requirements are differed on the threshold of 1,000sqm of economic floorspace. This is consistent with the adopted policy approach, which has been successful in securing affordable and/or managed workspace against the borough's identified need, which is set out in the Employment Land and Premises Study (October 2020). • LP43 Out of Centre Development: Taking forward the approach within the adopted Local Plan, development proposals that result in an extension to existing retail and leisure developments of more than 200sqm that are in an 'out-of-centre' location will not be permitted. Retail and leisure uses over 400sqm (gross), including as a result of an extension, require an impact assessment. This is a locally-set threshold which is consistent with the Sunday trading threshold (280sqm net), and is informed by the borough's Retail Needs Assessment (June 2020). This is clearly explained in the supporting text. • LP44 Local Shops and Services: Uses providing essential goods and services are permitted in locations that are not within 400m of an existing centre of an Important Local Parade. This distance is set on the basis of 'reasonable walking distance' and is explained within the text of the policy. • LP46 Visitor Accommodation: The policy requires that proposals for new visitor accommodation will be managed appropriately as short-term accommodation, with stays not exceeding 90 consecutive days. The 90 day requirement is set out in the Deregulation Act 2015. • LP51 Parking, Servicing and Car Free Development: Parking standards, including car free development, and electric vehicle charging capacity are set in accordance with the thresholds identified within the London Plan.

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>A number of policies also distinguish requirements based on whether the application is for a minor or major development, including:</p> <ul style="list-style-type: none"> • LP10 Responding to the Climate Crisis • LP12 Water and Flooding • LP17 Social and Community Infrastructure Development • LP19 Play Space, with the requirements set out in accordance with the London Plan. • LP20 New Open Space • LP23 Affordable Housing, with the requirements set out in accordance with the London Plan. • LP24 Housing Mix • LP39 Local Employment and Training Opportunities 				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
34.		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?		<p>Reason for score: The Local Plan sets out a strategic framework for the borough, however certain non-strategic matters are deferred to existing or future SPDs. Where SPDs already form part of the development plan, it is considered appropriate to refer to these rather than repeat information within the Local Plan (e.g. the Planning Obligations SPD) or where more detailed area-specific information is included (e.g. The Wandle Delta Masterplan SPD). These documents may need to be updated to reflect the new policies, however any guidance which is consistent with the Local Plan will remain applicable. The Local Plan refers to the publication of further guidance on:</p> <ul style="list-style-type: none"> • Residential alterations and extensions, noting the ‘strong local interest’ from the community with respect to this type of development. As such, the Council intends to prepare an SPD that will set out further guidance on the development principles set out within LP5 Residential Extensions and Alterations. The SPD will help to support the implementation of this policy. 				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> The preparation of design codes for key areas with capacity for growth. This is consistent with the new London Plan and the Good Quality Homes SPG. The SPD would provide locally specific detail to assist developers/applicants in submitting successful planning applications, however these would be consistent with the framework/requirements of the Local Plan policies on this topic. <p>The approach to the Battersea Design and Technology Quarter (including the relevant site allocations) makes reference to the Battersea Design and Technology Quarter Economic Appraisal and Design Framework (February 2020), however the Local Plan recognises the more limited weight afforded to the document (i.e. relative to an SPD), and potential applicants are asked only to 'have regard' to the document. The approach to land use and scale of development in this location is set out within the Local Plan itself.</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Hierarchies are consistent throughout the Local Plan and with both National Policy and other applicable development framework documents, such as the London Plan. Hierarchies are referenced within the following policies:</p> <ul style="list-style-type: none"> Policy LP4 Tall and Mid-rise Buildings sets out a spatial hierarchy, which is consistently used within the Local Plan (e.g. in site allocations). Policy LP10 Responding to the Climate Crisis refers to the energy and cooling hierarchies, which are consistent with and set out in the London Plan (Policy SI2 and SI4, respectively). This approach is clarified within the supporting text. Policy LP11 Energy Infrastructure refers to the design of development schemes in accordance with the heating hierarchy, as set out in London Plan Policy SI3.D and SI4.B. 				
35.	<p>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>					

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> • Policy LP12 Water and Flooding sets policy requirements on the basis of a hierarchy of flood zones as established by the Environmental Agency, and to the London Plan drainage hierarchy. This approach is clarified within the supporting text. • Policy LP13 Circular Economy, Recycling and Waste Management seeks to ensure that waste is managed in accordance with the waste hierarchy. This is clearly explained within the supporting text. • Policy LP33 Promoting and Protecting Offices sets out a hierarchy for the location of new office floorspace. This prioritises town and local centres above appropriate edge-of-centre sites allocated for office use, before finally within existing economic areas, and is therefore considered to be consistent with the NPPF. • Policy LP41 Wandsworth’s Centres and Parades sets out a hierarchy of centres, which is consistent with the NPPF. To note, this differs from the hierarchy established within the London Plan; however this issue has not been challenged by the GLA within duty to cooperate meetings nor representations made in consultations on the draft Local Plan. 				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Policies that limit certain uses do so on the basis of the Council’s evidence base and/or are consistent with other development plan documents (such as the London Plan) or national policy. The justification for limitations on certain uses is clearly set out within the supporting text. Policies that place limitations on uses include:</p> <ul style="list-style-type: none"> • LP15 Health and Wellbeing: Fast food takeaways are prohibited within 400 metres of the boundaries of a primary or secondary school, which is in accordance with London Plan Policy E9. • LP33 Promoting and Protecting Offices: Office uses are not permitted outside of identified locations unless these have been sequentially tested. This approach is consistent with the NPPF and is based on the evidence set out within the borough’s Employment Land and Premises Study (October 2020) and the Housing and Economic Land Availability Assessment (January 2022). The supporting text provides the rationale for this approach. 				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>					

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> • LP34 Managing Land for Industry and Distribution: Non-industrial uses are not permitted within the borough’s strategic reservoir of industrial land. This is consistent with the requirements of the NPPF (in particular paragraph 82) and in accordance with the identified need set out within the Employment Land and Premises Study. The supporting text provides the rationale for this approach. • LP36 Railway Arches: The uses of railway arches are limited depending on the location of the arch. This is justified by the identified need for certain uses, and the functional limitations of these spaces, as set out in the Employment Land and Premises Study and clarified within the supporting text. • LP40 Safeguarding Wharves: The borough’s five wharves are safeguarded in line with the Secretary of State’s Safeguarding Directions and the London Plan. • LP42 Development in Centres: Appropriate uses within the borough’s town centres and primary shopping areas are defined in accordance with the NPPF (paragraph 86). The Local Plan introduces greater flexibility with respect to acceptable uses in these locations than is possible within the adopted Local Plan in accordance with the evidence set out in the Retail Needs Assessment (June 2020). Conversely, town centres uses (including visitor accommodation) are not permitted in out of centre locations unless certain requirements (e.g. sequential testing) have been met, as per the NPPF. • LP52 Public Transport and Infrastructure: New minicab (private hire) offices are not permitted anywhere in the borough due to the digitisation of the private vehicle hire industry. This is set out within the supporting text. <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</p>				
<p align="center">37.</p>	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p>	<p align="center">-2</p> <p>No, we do not meet this requirement</p>	<p align="center">-1</p> <p>No, we may not fully meet this requirement</p>	<p align="center">0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p align="center">+1</p> <p>Yes, we are likely to meet this requirement</p>	<p align="center">+2</p> <p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: Where standards are set within the Local Plan, these are considered to be justified, based on the Council’s evidence base, and deliverable. The Local Plan as a whole promotes a design-led approach, as informed by the borough’s Urban Design Study (December 2021), and which is considered to be consistent in approach with the National Design Guide and the London Plan.</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	<p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	<p>Where policies set specific technical standards for proposed development, such as in LP37 Requirements for New Economic Development (for industrial uses), these are based on the experience of the borough (e.g. with respect to a well-functioning industrial unit). Policies are nonetheless flexible enough such that technical standards they can be departed from where adequately justified.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
		<p>Reviewer Comments:</p>				
<p>Deliverability</p>						
<p>38.</p>	<p>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan has been subject to a Whole Plan Viability Assessment (January 2022), which found that “Overall, it can be concluded that solely based on the exercise of viability testing and results ... the Reg 19 Local Plan is realistically deliverable. That is, policy requirements are considered to not unduly burden the delivery of development in Wandsworth borough, including the delivery of the site allocations, which would be required to meet the aims of the Local Plan” (paragraph 8.10). Similarly, the Nine Elms Battersea Development Infrastructure Requirements Refresh Study 2019/2020 (November 2021) found that “there will be sufficient funding available from development within the NEB to fund infrastructure” (paragraph 8.2.4).</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
<p>Reviewer Comments:</p>						
<p>39.</p>	<p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan has been subject to a Whole Plan Viability Assessment (January 2022), which found that “Overall, it can be concluded that solely based on the exercise of viability testing and results ... the Reg 19 Local Plan is realistically deliverable. That is, policy requirements are considered to not unduly burden the delivery of development in Wandsworth borough, including the delivery of the site allocations, which would be required to meet the aims of the Local Plan” (paragraph 8.10). Similarly, the Nine Elms Battersea Development Infrastructure Requirements Refresh Study 2019/2020 (November 2021) found that “there will be sufficient funding available from development within the NEB to fund infrastructure” (paragraph 8.2.4).</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
<p>Reviewer Comments:</p>						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
40.	Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	<p>Reason for score: The Publication (Regulation 19) Local Plan has been developed alongside and informed by the viability assessment of the Pre-Publication (Regulation 18) version. This is recorded in the Whole Plan Viability Assessment (January 2022), which notes that PPE [the consultants] “have conducted a high-level viability assessment review of the cumulative impact of the ‘Wandsworth Regulation 18 Pre-publication Draft Local Plan (Nov 2020)’ ... and its emerging policies. This has helped inform the local authority’s decisions about the risk and balance between the policy aspirations of achieving sustainable development and the realities of economic viability that would inform the Reg 19 Local Plan document to be submitted to the Secretary of State” (paragraph 1.2).</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: This is set out within the Monitoring Framework (January 2022). The data required is considered to be reasonably available.</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments:				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Mechanisms for review are clearly set out in LP61 Monitoring the Local Plan. This commits that the Council will complete a review of the Local Plan at least every 5 years, setting out the factors that will inform this review (including external factors, such as changes in plan-making activities by other local authorities, the Mayor of London, or for reasons of conformity with national planning policy). It also sets out mechanisms that would</p>				
Where triggers for plan review and/or update are identified are they justified and proportionate?						

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>commence an early review, including that the Authority Monitoring Reports demonstrate that annual housing delivery is less than 75% of the annualised requirement or the projected completion rate for 3 consecutive years; or that the Council cannot demonstrate a 5-year supply of deliverable housing land against the requirements established through the Local Plan. These are considered justified and proportionate.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right:</p>				
		<p>Reviewer Comments:</p>				
Plan effectiveness (and associated policy clarity)						
42.		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan clearly sets out that it covers the time period from 2022/23 to 2037/38, providing for a minimum of 15 years from the anticipated date of adoption (2023). The strategic policies of the Plan are set out in paragraph 1.11.</p> <p>Whilst Policy SDS1 is identified as a strategic policy, and therefore applies for the whole of the Local Plan period; it is noted that the Local Plan extends beyond that for which housing targets are set through the London Plan. The housing target for these years has been set in accordance with the London Plan (paragraph 4.1.11), however the Local Plan recognises that the London Plan is likely to be reviewed during the lifetime of the Local Plan, including the housing targets for Wandsworth. In such circumstances, the Local Plan commits to the Council undertaking a review of the Plan and to updating it if necessary, as set out in paragraph 2.105 and in accordance with Policy LP61 Monitoring the Local Plan.</p> <p>The evidence underlying the policies generally cover the entire Local Plan period, however the Employment Land and Premises Study (October 2020) covers a 15 year period from the date that the work was commissioned in 2019 – running until 2034. Paragraph 82 of the NPPF states that planning policies should (in part b) “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”. The Study, however, notes that “Predicting future economic trends and corresponding employment land requirements is not an exact science. The assessment needs to be based on a series of assumptions, including</p>				
<p>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?</p>						

KEY QUESTIONS		Assessment						
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>						
		<p>the future performance of individual business sectors, the proportion of employment in each sector that corresponds to each of the B-use classes, and the future employment densities and plot ratios for each of use class. Furthermore, the future economic performance of Wandsworth’s economy is subject to external factors which are difficult to predict” (paragraph 6.6). As such, longer-term forecasting becomes increasingly unreliable, and the Local Plan therefore commits to the need “to monitor the impacts of such [external] factors and to update the demand forecasting and the policy position if considered necessary” (paragraph 18.5).</p> <p>The Local Plan does not consider further ahead than a 15 year period from adoption.</p>						
		<p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right: There is a requirement for the Local Plan to be reviewed within 5 years of adoption (also set out within Policy LP61 Monitoring the Local Plan), affording the opportunity for the Local Plan evidence to be updated and the policies amended accordingly. Furthermore, there is a significant barrier (6 years) covered by the evidence in the event that the Local Plan is not updated in that 5 year timeframe. The NPPF, in paragraph 86, requires that planning policies “allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead”. For offices, which the Local Plan direct primarily to town centres, evidence covering the 10 year period required by the NPPF is therefore met, even if the 15 year Local Plan period is not. The Retail Needs Assessment, June 2020, which addresses retail, leisure and food and beverage uses, sets out need to 2040.</p>						
43.		Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?		Reviewer Comments:				
				-2	-1	0	+1	+2
				No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
				<p>Reason for score: Paragraph 1.10 clearly sets out that the Local Plan fully replaces and consolidates the policies and site allocations in the adopted Local Plan (Core Strategy, Development Management Policies Document, Site Specific Allocations Document, Employment and Industry Document) within a single new Local Plan Document.</p>				
				<p>Implications of taking no further action:</p>				
<p>Mitigation / Action required (if necessary) to move scale to right:</p>								

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
44.	<p>Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</p>	<p>Reason for score: The objectives of the Local Plan are clearly set out within Chapter 2, and are identified within 3 categories: environmental objectives, social objectives, and economic objectives. These are required to achieve the vision set out within the Local Plan (paragraph 2.56), and are, in turn, the basis for the Plan’s spatial strategy. A key part of the spatial strategy is articulated through the Area Strategies – which are noted as providing the “framework for how new development in different areas of the borough should be designed and planned for in order to meet the Vision and Objectives of the Local Plan” (paragraph 2.67), and which include the greatest cluster of Site Allocations. The placemaking approach is informed by an integrated framework based on the concepts of Placemaking, Inclusive Growth, and People First. These principles are embedded in policy in both SDS1 (Spatial Development Strategy 2023 – 2038) and PM1 (Area Strategy and Site Allocations Compliance), the latter of which notes that development proposals must address the Placemaking, Inclusive Growth and People First principles, and – moreover – that development which will prejudice the delivery of the Local Plan’s Visions and Objectives, or the objectives of the relevant Area Strategy will not be allowed. The Area Strategies are intended to supplement the implementation of the borough-wide policies, which is set out within paragraph 3.3.</p> <p>The Local Plan has been carefully checked by officers (both reviewing their own policies and those drafted by others) to promote a consistent approach and to ensure that policies can be easily used and understood. Supporting text explains how the Area Strategies and the Site Allocations (where relevant) should be used by prospective applicants (paragraphs 3.1 to 3.15)</p>				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, to ensure that the Local Plan policies can be easily understood and used in decision making.				
		Reviewer Comments:				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
45.	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The majority of policy areas designated within the Local Plan are clearly defined in the Local Plan, and their spatial extent is clearly set out on the Local Plan policies map. This document is produced only in draft for the purposes of the submission and examination, and a final version will be published alongside the adopted Local Plan. For the purposes of the examination, the LPA has also produced a Policies Map Changes Document (January 2022), which sets out all amendments to the adopted Policies Map as a result of the revised Local Plan. This is also supported by an interactive map which depicts the designations identified in the revised Local Plan in a format where these can be toggled on and off and areas zoomed in. The Tall Buildings maps include detailed ‘heat mapping’ which identifies suitability for higher or lower tall buildings. For technical and legibility reasons, this information is not included on the Local Plan policies map nor the online interactive map, which only the areas to which the relevant policy applies (LP4 Tall and Mid-rise Buildings). Detailed maps for each of the Tall Building zones are, however, included in Appendix 2 Tall Buildings and Mid-rise Building Maps) in the Local Plan.</p> <p>Two of the policy designations require further explanation for their use in decision making:</p> <ul style="list-style-type: none"> The boundaries of the Area Strategies are not drawn to follow road or site boundaries, and therefore will intersect buildings and sites. This is intentional and the role of the boundaries is clarified within paragraph 3.7: “Indicative areas are shown on the Policies Map for each Area Strategy, though these should be used to understand the general geographic focus of the strategy in each place, rather than define hard and fast boundaries. The changes that are expected to occur within the Area Strategy areas will impact upon their surrounding context, and the context should be considered in bringing changes forward. The Area Strategies provide the area of focus, however development outside of the areas would need to be cognisant of and have regard to them”. The London Plan identifies a potential CAZ Retail Cluster in Nine Elms at the Battersea Power Station. This is identified within the Local Plan, however an indicative boundary is used. Policies within the Local Plan do make reference to the boundary (e.g. Part B of LP 41 Wandsworth’s Centres, which states that this, alongside the town centres, should be the focus for large-scale shopping and leisure and other major trip-generating development, including offices; and LP43 Out of Centre Development, Part B.2 of which states that in locations outside of the emerging CAZ retail clusters at Battersea Power Station, small scale retail uses are appropriate where these perform a local function and support residential-led mixed-use development. Units totalling less than 400 sqm (gross) will not be subject to sequential testing). Despite 				

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>the indicative boundary, it clearly encircles the Battersea Power Station development, and the LPA are working closely with the developers to bring that site forward in a way that is consistent with the Local Plan and existing masterplanning within the area. As this is an ongoing process, it was difficult to identify a clear boundary at the time of drafting the Local Plan. This approach is considered to be consistent with the London Plan.</p> <p>The Local Plan includes a number of maps serving different functions, including:</p> <ul style="list-style-type: none"> • Providing context for the borough (e.g. Map 2.1 Public Transport Map). • Providing context for the Local Plan policies (e.g. Map 3.1 UDS Character Areas). • Cartographically representing the Local Plan spatial strategy (e.g. Map 2.2 Key Diagram). • Cartographically representing Local Plan Area Strategies (e.g. Map 4.1 Wandsworth Town) • Cartographically representing Site Allocations (e.g. Map 3.2 Site Allocations, Map 4.2 WT 1 Chelsea Cars and KwikFit, Armoury Way, SW18). • Cartographically representing Local Plan policy designations (e.g. Map 18.1 Economic Land, Maps in Appendix 2 Tall Building and Mid-rise Building Maps). <p>It is considered clear from the context of the maps how each is to be used. Where they depict a policy designation or the extent of an area strategy, the boundary is clearly shown against a base map. It is noted that the resolution of the images within the submitted Local Plan is not particularly high, due to the large file size of the document; however the LPA website makes it clear (including during the consultations on this document) that higher resolution images could be made available upon request.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: A defined boundary for the CAZ Retail Cluster could be agreed through a Statement of Common Ground with the Battersea Power Station Development Company.</p> <p>If considered necessary, additional text could be included within the Local Plan to clarify exactly the function of each map, in line with the above.</p>				
		<p>Reviewer Comments:</p>				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan policies have been carefully reviewed to make it clear the type of development that they will promote. Where development promotes a specific type of use, this is generally referred to within the policy itself (e.g. LP34 Managing Land for Industry and Distribution, Part A of which stipulates the types of uses that are considered to fall under the category of ‘industry and distribution’). Many terms relating to forms of development are also defined within Appendix 4 Glossary, such as ‘economic uses’ and ‘town centre uses’.				
		The Local Plan has been specifically reviewed to promote the use of positive wording, and policies are generally phrased to stipulate the type of development that will be supported. Only in exceptional circumstances, where it is considered necessary to achieve the objectives of the policy, does the Local Plan seek to include negative language (e.g. LP34 Managing Land for Industry and Distribution, Part B.4. states that “Development proposals for other [non-industrial] uses in these locations will not be supported”, which is considered necessary to ensure the long-term provision of industrial land in the majority of the borough’s strategic reservoir).				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, where opportunities exist for policies to be more positively expressed.				
		Reviewer Comments:				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said ‘all development’ this implies equal application irrespective of the	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policies have been drafted to clearly stipulate the types of uses, and (where appropriate) the scale and location of these uses. Policy LP35 Mixed Use Development on Economic Land, Part A, is a good example of a policy which sets out different criteria for mixed-use residential and economic development, subject to the location of the site. Similarly, the requirements of Policy LP10 Responding to the Climate Crisis make clear how policy requirements differ depending on the scale of the development (e.g. above 100 sqm of non-residential;				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
	<p>development scale/use/location and this may not be either justified or deliverable]</p>	<p>differentiation between major and non-major schemes). These principles have been applied throughout the Local Plan.</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, to clarify the application of policies where this is differentiated based on scale, use, or location, where this is not considered clear.</p> <p>Reviewer Comments:</p>
<p>I</p>	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>There are 74 policies in the Local Plan, consisting of 63 ‘general’ (topic-based) policies, 10 area-based policies, including a policy on development compliance with these, and one policy on the spatial development strategy.</p> <p>The Local Plan has been checked to remove, as much as possible, repetition of wording between multiple policies. There is significant cross reference within the Local Plan to other policies; however this is deliberate as it is considered to help to signpost prospective applicants to key related policies (notwithstanding the expectation that the Local Plan should be read in whole), and is also used to clarify the application of expectations without the need to repeat criteria. This is particularly the case for the Area Strategy policies (PMx). It is noted that Policy LP28 (Purpose-Built Student Accommodation) states the requirement for ground floor uses to pass the sequential test, which repeats that set out in LP 43 (Out of Centre Development). The LPA is happy to remove any cross-referencing that is considered unhelpful or unnecessary.</p> <p>The following policies include reference to other policies within the Local Plan: SDS1, PM2, PM3, PM4, PM5, PM6, PM7, PM8, PM9, PM10, LP2, LP4, LP6, LP7, LP10, LP15, LP27, LP28, LP29, LP33, LP34, LP35, LP36, LP37, LP38, LP42, LP43, LP49, LP51, LP52, LP58, and LP59.</p> <p>One policy within the Local Plan makes explicit reference to the NPPF, but does not repeat standards from that document: LP 43 (Out of Centre Development), which notes specific reference to the sequential test and impact assessment as set out in the NPPF.</p> <p>The Local Plan must be in ‘general conformity’ with the London Plan, and the two plans are therefore closely related. A large number of the policies in the Local Plan refer to the London Plan; however in the majority of instances this is to reference criteria or standards required by the London Plan which are not themselves repeated in the Local Plan.</p>

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>It is considered helpful to clarify that the Local Plan conforms (and expected compliance) with the London Plan requirements with respect to strategic policies such as affordable housing (LP 23). References to London Plan policies are also intended to signpost to relevant information – again intended to assist – however these could be removed if considered appropriate.</p> <p>The following policies reference policies from the London Plan: LP1, LP4, LP10, LP11, LP14, LP15, LP19, LP23, LP25, LP27, LP28, LP29, LP30, LP31, LP35, LP37, LP40, LP45, LP46, LP51, and LP57.</p> <p>Policy LP58 (River Corridors) refers to the Thames Estuary 2100 Plan and the Thames Estuary Partnership Estuary Edges design guidance (2019).</p> <p>Further formatting work could be done as part of the adopted version to ensure that references to other documents use a consistent approach, as well as to clarify occasional references to the London Plan which are not specific, such as in Policy LP27 (Housing Standards) and LP57 (Urban Greening Factor).</p>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: There is significant cross-reference in the Local Plan both to other policies within that document, as well as to policies within the London Plan; however generally these do not repeat wording or criteria and are considered either necessary to clarify the application of the policy or helpful for purposes of signposting.</p>				
		<p>Implications of taking no further action:</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to remove any cross-referencing that is considered to be unnecessary or repetitious.</p>				
<p>Reviewer Comments:</p>						
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Reference is made within the supporting text of Policy LP10 Responding to the Climate Crisis to the Building Regulations, however this is considered to be necessary as it sets out how the Local Plan policy seeks to exceed those standards and is thus used for a purpose of benchmarking (see paragraphs 15.16 and 15.17).				
		Policy LP56 (Tree Management and Landscaping) refers to British Standard 5837 (Trees in relation to design, demolition and construction), however it does not repeat aspects of this.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Throughout the Local Plan, references are made to the ‘appropriate height’ or ‘appropriate height range’ of buildings, however what this refers to is sufficiently clarified through Appendix 2 Tall Building and Mid-rise Building Maps, which is referred to in Policy LP4 Tall and Mid-rise Buildings.				
		A significant number of policies also refer to ‘where appropriate’, however generally the use of this phrase is contextualised such that the meaning should be clear to the user. It is noted that a number of the Area Strategies policies (PMx) make reference to ‘appropriate’ with respect to potentially subjective features, such as ‘poor quality signage’.				
		A more limited number of policies use the phrase ‘to the Council’s satisfaction’, however it is considered that either sufficient associated clarification is provided within the wording of the policies (or elsewhere in the Local Plan, for example with respect to the marketing of premises in Appendix 1 Marketing Evidence), or alternatively the activation of the requirement will only apply to a very limited number of circumstances, and is therefore unlikely to cause significant issues for the decision maker.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
		Implications of taking no further action:
		Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to remove any references to ambiguous wording from the Local Plan, if considered appropriate by the Planning Inspector.
		Reviewer Comments:

Date of assessment:	April 2022 (Final)
Assessed by:	Wandsworth Planning Policy Team
Overall Score:	78/100
Comments:	

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